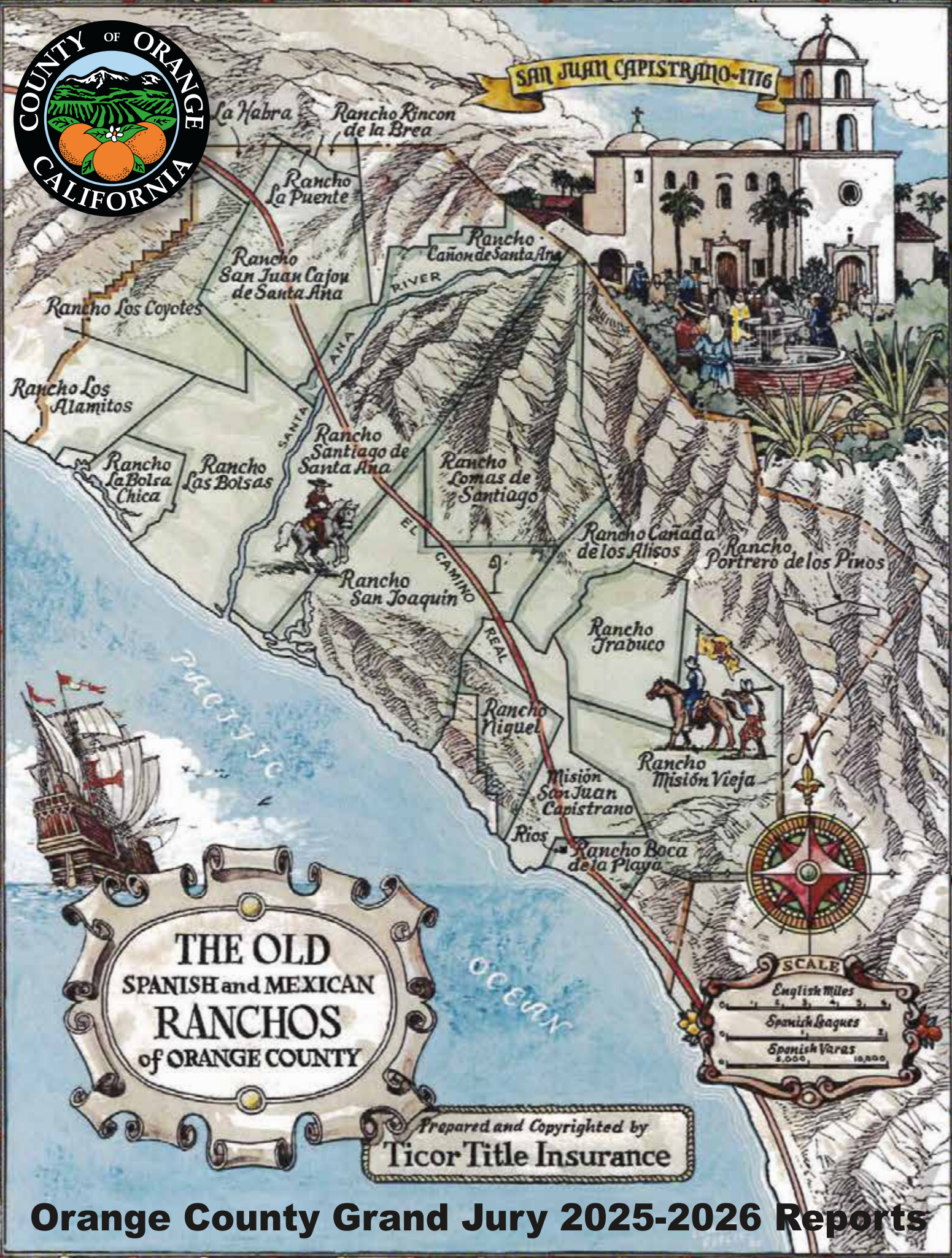




**THE OLD
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of ORANGE COUNTY**

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ACKNOWLEDGMENT

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ORANGE COUNTY GRAND JURY

700 CIVIC CENTER DRIVE WEST • SANTA ANA, CALIFORNIA 92701 • 714/834-3320
www.ocgrandjury.org • FAX 714/834-5555

June 30, 2026

The Honorable Sheila F. Hanson, Presiding Judge
Superior Court of California, County of Orange
700 Civic Center Drive West
Santa Ana, CA 92701

Dear Judge Hanson:

On behalf of the 2025–2026 Grand Jury, I am pleased to present our Final Report, which brings together seven investigative reports completed during this term. The Grand Jury prepared these reports with the goal of promoting meaningful, positive improvements across all areas of Orange County government. It has been my honor to serve alongside nineteen dedicated jurors whose commitment to quality, thoroughness, and hard work was evident every day and is reflected in the reports that follow.

Through a combined effort of investigative interviews, intensive research, site tours, document review, and data analysis supported by realistic, workable findings and recommendations the reports allowed each topic to be thoroughly examined. The 2025–2026 Grand Jury also adhered to a strict schedule, ensuring ample time for every report to receive a comprehensive and thoughtful review.

As part of the Grand Jury's criminal indictment responsibilities, the 2025-2026 Grand Jury also held fifteen criminal indictments and four investigative hearings comprising approximately twenty-five percent of our time. We also received and reviewed fifty-five complaint letters, a few of which led to this year's reports.

In accordance with California Penal Code section 919(b), members of the 2025–2026 Grand Jury are required to “inquire into the conditions and management of the public prisons within the county.” Fulfilling this mandate, the Grand Jury visited five detention centers and found no concerns regarding the conditions or management of these facilities in Orange County. In addition, members of the Grand Jury attended two sessions with Coroner Case Reviews.

Due to ongoing construction and improvements at the Orange County Santa Ana Courthouse, the Grand Jury relocated to a new facility on December 1, 2025. The new location provides expanded and improved space for the Grand Jury office, conference rooms, and lunchroom. Our indictment and investigative hearings continued to be held in our former office space in the County Courthouse until early June, after which future cases will be conducted in available courtrooms or in the Grand Jury Office.

We are grateful for your support throughout the year, and I want to especially thank Honorable Terri Flynn-Peister, Assistant Presiding Judge, Superior Court of California, County of Orange, for her continued guidance and support through the relocation and human resource challenges this year.

In addition, we must thank the following people without whose help the Grand Jury's work could not have been accomplished.

- Honorable Larry Yellin, Supervising Judge
- Matt Bradbury, Deputy District Attorney
- Kostas Kalaitzidis, Court Public Information Officer
- Donald Barnes, Sheriff-Coroner
- Amber Hogate, Court Reporter

A special thank you goes to Jeff Stock, Grand Jury County Counsel. Jeff was consistently available for consultation and in-person meetings whenever legal questions arose or guidance was needed to support the development of accurate, high-quality reports. He also provided thorough review and approval of our proposals and investigative reports.

The Grand Jury could not have accomplished its work this year without the unwavering support of Joyce Mwangi, Grand Jury Coordinator, and Liza Valenzuela, Jury Services Coordinator. Joyce's extensive experience and deep knowledge of proper procedures and processes consistently guided us toward success. Both were accommodating and proactive in helping us navigate challenges and avoid pitfalls throughout the year. They served as our vital link to the Court, the District Attorney, County Counsel, and the many cities and agencies with which we interacted.

Finally, the Grand Jury thanks the members of the Grand Jury Recruitment and Selection Committee who interview and selected us for this opportunity to serve the people of Orange County over the past year. It has been an honor and pleasure.

Respectfully submitted,

A handwritten signature in blue ink that reads "Judy D Howard". The signature is written in a cursive, flowing style.

Judy D Howard, Foreperson
2025-2026 Orange County Grand Jury

JH:jm



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June 30, 2026

The Honorable Sheila F. Hanson, Presiding Judge
Superior Court of California, County of Orange
700 Civic Center Drive West
Santa Ana, CA 92701

Dear Judge Hanson:

It is my pleasure to present to you the 2025-2026 Grand Jury's summary of actions regarding California Penal Code section 919(b), which requires the Grand Jury to "inquire into the conditions and management of the public prisons within the county". The following outlines the Grand Jury's approach and effort in fulfilling this mandate:

The detention facilities visited and inspected included:

- Theo Lacy Facility
- Orange County Central Jail Complex (with Intake Release Center)
- Juvenile Hall
- James A. Musick Facility
- Santa Ana Jail

The basic criteria researched during these visits were:

- Incidents involving harm to or death of inmates
- Incidents of ineffective jail or prison management by staff – sworn and unsworn
- Effectiveness of department preparations and planning to deal with effects of new laws on County jails, e.g. AB 109
- Drug use
- Custodial health issues
- Financial issues
- Efficiency of operations
- Recidivism

The Honorable Sheila F. Hanson
June 30, 2026
Page 2 of 2

The 2025-2026 Grand Jury has found no concerns with the conditions and management of the detention centers within the county. The 2025-2026 Grand Jury has fulfilled its mandate pursuant to Penal Code 919(b) and will file this letter and any pertinent documents deemed relevant to this matter with the 2025-2026 Grand Jury Official Records.

Sincerely,

A handwritten signature in blue ink that reads "Judy Howard". The signature is fluid and cursive, with the first name "Judy" and last name "Howard" clearly distinguishable.

Judy Howard, Foreperson
2025-2026 Orange County Grand Jury

JH:jm

Members of the 2025-2026 Grand Jury



Members of the 2025-2026 Grand Jury

Officers

Judy Howard, Foreperson

Tom Burnham, Foreperson Pro Tem

Kathleen Conwell-Doyle, Secretary and Evidence Recorder

Loren Webb, Sergeant at Arms

Marc Reardon, Assistant Sergeant at Arms

Auxiliary Positions

Malette Magruder, Technology Support

Mark Mullis, Historian

Kris Beard, Parliamentarian

Gail Dennis, Social Director

Members at Large

Diana Mendez

Jayne Mekis

Kendall Wamel

Larissa Leybovich

Ben Bautista

Karyn Andre

David Mount

Brian Foist

Amanda Grey

Harshad Badani

Orange County Grand Jury 2025-2026 Reports in Order of Issuance

2025–2026 Grand Jury, Pursuant to Penal Code Section 933(a), completed seven civil investigations addressing topics including county and city government, drinking water quality, transportation, fire mitigation, and county agencies. In accordance with Penal Code Section 919(b), the Grand Jury also inspected and evaluated the condition and management of Orange County jails.

The Grand Jury approached its work with a commitment to producing thorough, well-researched reports supported by verified facts and interviews. Each report includes practical findings and recommendations intended to achieve meaningful improvements.

Below is a summary of each report. The 2025-2026 Grand Jury takes pride in its accomplishments.

- ***A Breach of Public Trust In Orange County:***

- ***Buried in the Fine Print: How the Board of Supervisors Orchestrated Their Salary Hike***

- The Orange County Grand Jury found the Board of Supervisors approved a 25% salary increase in 2025 through a non-transparent process, embedded in the broader budget. It recommends rescinding the raise or requiring independent review and stronger public oversight to improve accountability and restore public trust.

1

- ***Connecting Orange County to LAX:***

- ***Evaluating Transportation Options***

- A study was conducted to assess current travel options between Orange County and Los Angeles International Airport (LAX). This report identified five viable Orange County candidate sites for direct-to-LAX transportation services that could reduce trip times to LAX by 30 minutes or more, reduce traffic congestion and vehicle emissions, and potentially reduce overall transportation costs to LAX.

2

- ***Wildfires Hit Home:***

- Wildfires have become a fact of life in California. The Grand Jury investigated the impacts of wildfires on Orange County residents. The report concludes that California's wildfire and insurance crisis demands coordinated action from County and local governments, fire authorities, communities, and homeowners to reduce risks of wildfire.

3

Orange County Grand Jury 2025-2026

Reports in Order of Issuance

Continued

4

- ***California Housing Mandates:***

- ***The Unintended Reshaping of Orange County Neighborhoods***

- An investigation on the impact of California's State Housing Mandates in Orange County and how effectively these policies translate into real-world outcomes. The report finds that implementation has the potential to lead to financial strain, administrative burdens, and little measurable growth in housing production.

5

- ***PFS and Public Awareness:***

- ***A Closer Look at Orange County Drinking Water***

- An analysis of PFAS level detected by Orange County drinking water agencies was conducted. This analysis included agencies' responses to regulatory requirements, progress of treatment facility planning and installation, and implementation of public education programs.

6

- ***Growing Political Appointees and Discretionary Spending Within the OC Board of Supervisors:***

- The Orange County Grand Jury found that Board staffing, budgets, and discretionary spending have outpaced inflation and population trends, despite fewer residents being served. It warns expanded political staffing may duplicate functions and weaken coordination, recommending reforms such as zero-based budgeting and reduced discretionary spending to strengthen accountability and fiscal discipline.

7

- ***Unbalanced Authority:***

- ***Oversight and Accountability in Orange County Government***

- A review found that legal limits keep Orange County Supervisors from holding elected officials accountable, even after confirmed misconduct. It urges structural reforms and stronger oversight to address mismanagement or authoritative abuse.



A Breach of Public Trust in Orange County

**Buried in the Fine Print: How the Board of
Supervisors Orchestrated Their Salary Hike**



Orange County Grand Jury 2025-2026

TABLE OF CONTENTS

SUMMARY4

BACKGROUND5

REASON FOR STUDY.....8

METHOD OF STUDY9

INVESTIGATION AND ANALYSIS 10

FINDINGS 20

RECOMMENDATIONS..... 20

REQUIRED RESPONSES..... 21

GLOSSARY AND ACRONYMS 22

BIBLIOGRAPHY..... 23

APPENDIX A 25

APPENDIX B 26

APPENDIX C 27

APPENDIX D 28

SUMMARY

In June 2025, the Orange County Board of Supervisors quietly approved a 25% salary increase for themselves—just days after disgraced Supervisor Andrew Do was sentenced for bribery. This raise elevated their compensation above that of the Governor of California. Notably, the agenda item authorizing their salary increase was not clearly identified, effectively obscuring it from public scrutiny.

The timing was especially troubling as the County has been facing hiring freezes and budget constraints. This decision was not only tone-deaf—it reflected a deeper disconnect from the Supervisors' duty to serve the public with transparency and fiscal responsibility.

Following a corruption scandal, elected bodies typically respond with transparency, humility, and a renewed commitment to ethical governance. They engage the public, restore fiscal integrity, and demonstrate that they understand the gravity of their responsibilities.

Regrettably, in this instance,
the Orange County Board of Supervisors chose a different path.

Elected officials are entrusted to serve, not to enrich themselves. When this happens, the foundation of representative democracy is undermined.

The Orange County Grand Jury (Grand Jury), in its oversight role (see California Penal Codes 925 & 927¹), must call out the Board's covert approach in approving their salary increase — unlike other elected officials' salaries which are typically done as a separate line item on the agenda. The Board of Supervisors added their salary increase into the \$10.8 billion 2025-2026 Orange County Annual Budget adoption process. This resulted in a minimal description in the agenda and minimal opportunity for citizen input. Therefore, the Grand Jury investigated: why did they want to conceal their salary increase, was it warranted at this time and who initiated it?

The Orange County Board of Supervisors not only failed the citizens of Orange County by limiting financial controls that led to Andrew Do's corruption, but also by signaling that accountability and public trust are secondary to personal gain. This report is to highlight the failure of the Board of Supervisors in relation to their recent salary increase vote and to provide recommendations to regain citizen support

The people of Orange County deserve better, and
the people must demand it!

¹ [California Penal Code section 925 \(2025\)](#) & [California Penal Code section 927 \(2025\)](#)

Despite repeated efforts, the Grand Jury was unable to determine who orchestrated the Board of Supervisors' 2025 salary increase, who directed the obfuscation of the agenda item to conceal the raise, or whether any violations of the Brown Act occurred in the process. This failure stemmed from a pattern of misdirection and incomplete responses from the County executive management team. This impeded the Grand Jury's ability to uncover the truth. Confronted with the choice between continuing to pursue meetings that were repeatedly postponed, the invocation of attorney-client privilege, and a lack of cooperation from executive and support staff, who were unable or unwilling to recall key events or issuing a timely report while the matter remained both relevant and potentially reversible, the Grand Jury opted for the latter. Our findings and recommendations aim to bring transparency to the matter and prompt corrective action before public trust is further eroded.

BACKGROUND

The Grand Jury initiated an investigation to ascertain who drove the timing of the Orange County Board of Supervisors' (Board's) salary increase, and why it was buried on the Board meeting agenda as a part of the much broader adoption of the 2025-2026 Orange County Budget - especially considering the County of Orange recently implemented a hiring freeze due to budget shortfalls. The County of Orange also confronts approximately \$400 million in reported liability stemming from the Airport Fire². In addition, all nine labor unions with their various bargaining units are initiating contract negotiations for the renewal of labor contracts which set to expire in June 2026. The unions are posturing for a similar 25% salary increase for themselves (see **Error! Reference source not found.**). It appears the above noted major issues were ignored when the Orange County Board of Supervisors approved their own 25% salary increase. Looking forward, the salary increases, and other economic issues may cause a heavy burden on the financial stability of the County of Orange.

In June of 2025, the Orange County Board of Supervisor's agendaized through the budget adoption process, requiring two separate readings, a salary increase ordinance that would change the formula of how the Board of Supervisors were compensated. Since 2005, pursuant to county ordinance, the Board of Supervisors have been compensated at the rate of 80% of the compensation of the Superior Court Judges salaries, and have been increase annually, consistent with the Superior Court Judges' annual salary increase.

² [It's Not Just The Airport Fire: County Legal Payouts Total \\$258 Million Over Four Years](#)

The below figure is the ordinance explaining the Compensation of the Orange County Board of Supervisors - County of Orange Ordinance Section 1-2-7, Please draw your attention to subsection (d) for the 80% reference.

(a) Effective February 10, 2001, each member of the Board of Supervisors shall be compensated for his or her services as such member by salary at the rate of one hundred eight thousand dollars (\$108,000.00) per annum. No member of the Board of Supervisors shall receive any compensation, in addition to that provided for by this section, for services rendered as a member of the Board.

(b) Effective July 1, 2002, and on the same date each succeeding calendar year, the salary for each member of the Board of Supervisors shall be increased by twelve (12) percent.

(c) Effective July 1, 2005, the rate of pay for each member of the Board of Supervisors shall be set as a biweekly rate of pay based on subsection (d) below. The biweekly rate shall be consistent with the regular payroll cycles of the County's payroll operations and shall be paid at the same times and in the same manner as for County employees generally.

(d) Notwithstanding the provisions of subsection (b) above, the salary for a member of the Board of Supervisors shall be set at 80% of the regular annual salary of a judge of the Superior Court of the State of California.

(e) If any provision of this section, or the application thereof to any person in any circumstance, is held invalid, the remainder of the section, or the application of such provision to other persons and to other circumstance, shall not be affected thereby. The Board of Supervisors expressly declares its intention that subsection (b) of this section shall be fully operative and effective except as limited by subsection (d), and that if subsection (d) should be declared invalid, there should be no limitation upon the effectiveness or operability of subsection (b). The Board of Supervisors would have enacted subsection (b) without regard to subsection (d). Subsection (b) shall be deemed severable from subsection (d). If subsection (d), or any provision thereof is held invalid, then subsection (b) shall be deemed, notwithstanding such invalidity, to be fully effective and operable during the period of invalidity of subsection (d) preceding the determination of invalidity as well as thereafter.

(f) Each member of the Board shall also be provided with either the use of a County provided automobile or an automobile allowance, such health and welfare benefits and life insurance benefits and retirement as provided County Executive Management-Group I employees, and a contribution of six (6) percent of salary to a County offered deferred compensation plan.

(g) This compensation shall not be in lieu of any compensation for any service in any other capacity or on any other board or commission.

(Ord. No. 3540, § 2, 8-27-85; Ord. No. 3679, § 2, 1-12-88; Ord. No. 3722, § 1, 7-14-88; Ord. No. 3761, § 1, 7-26-89; Ord. No. 98-9, § 1, 6-30-98; Ord. No. 99-1, § 1, 1-12-99; Ord. No. 99-18, § 1, 8-17-99; Ord. No. 00-7, § 1, 6-27-00; Ord. No. 00-13, § 2, 12-12-00; Ord. No. 05-010, § 1, 5-24-05)

Notwithstanding the provisions of subsection (b) above, the salary for a member of the Board of Supervisors shall be set at 80% of the regular annual salary of a judge of the Superior Court of the State of California

The salary ordinance was amended and adopted on June 24th, 2025, to adjust their compensation to equal the Superior Court Judges' salaries. Because of the Board's vote, the Supervisors' salaries are now going to equal the Superior Court Judges' salaries.

On June 24th, 2025, per the public record, the salary increase was briefly discussed due to the objection of Vice Chair Supervisor Katrina Foley, who was the only member of the Board of Supervisors voting "no". Supervisor Don Wagner made a short public comment supporting for the Board's salary increase. There was neither public discussion nor executive staff comments at that meeting regarding the Board's salary increase.

On June 24th, Vice Chair Supervisor Katrina Foley released the following statement:

*“With statewide budget constraints and funding uncertainties at the federal level, I voted against pay raises for myself and my colleagues. We have a responsibility to be fiscally responsible, prioritizing the needs of those we serve and the employees who deliver necessary programs,” said Vice Chair Foley. “County funds should be used to compensate our staff, and cover costs incurred due to recent setbacks by disgraced former supervisor Do, or potential cuts to essential services. In these turbulent times, our focus should be on supporting our workforce and communities across Orange County, not on giving ourselves unnecessary raises.”*³

The Board of Supervisors’ salary increases sparked a wave of critical editorials and articles in local newspapers and online media, raising concerns about the timing, manner, and size of the salary increase⁴. Many questioned the Board of Supervisors’ judgement, especially with the ongoing financial challenges facing Orange County. The Board of Supervisors approached the salary increase with a lack of transparency and opportunity for public input. Further, the Grand Jury received multiple letters from the public which supported the initiation of this investigation.

In a striking disregard for timing and public accountability, the Orange County Board of Supervisors approved a salary increase for its members shortly after a former Orange County Supervisor was sentenced on federal bribery charges. On June 9th, 2025, Andrew Do was sentenced to five years in prison after pleading guilty to conspiring to funnel millions of dollars in COVID-19 relief funds to a nonprofit organization employing his daughter, in exchange for more than \$550,000 in bribes⁵. While the salary increase was positioned as a routine adjustment, its proximity to his conviction raised public concerns about oversight, ethics, and the perception of self-enrichment among county leadership.

One day after Do was sentenced, June 10th, at the Board of Supervisors’ meeting, the first public reading of the proposed salary ordinance change was made. No Supervisor commented on the Board’s salary increase.

³ [OC Vice Chair Katrina Foley Releases Statement Following Board of Supervisors Meeting Where the Board Voted to Approve the 2025-26 Budget, Didi Hirsch Contract, Traffic Reduction, and John Wayne Airport | Fifth District Supervisor Katrina Foley?](#)

⁴ [OC Board of Supervisors approves new county budget, pay raises for several top officials – Orange County Register](#)
[After approving their own wage hikes, two OC supervisors commit to donating the salary increase – Orange County Register](#)
[OC Supervisors Set to Quietly Give Themselves a 25% Raise](#)

⁵ [Ex-OC supervisor Andrew Do sentenced to 5 years in prison over corruption scheme | LAist](#)
[Central District of California | Former Orange County Supervisor Sentenced to 5 Years in Prison for Bribery Scheme Involving More Than \\$10 Million in COVID Funds | United States Department of Justice](#)
[How did a 22-year-old law student afford a \\$1 million home at the center of civil fraud allegations? | LAist](#)

The second required reading occurred on June 24th, 2025. At this meeting, Vice Chair Supervisor Katrina Foley commented that she would vote “no” on item 31, requiring the item to be pulled for discussion. Again, there was neither public comment nor a clarification by the Chairman of the Orange County Board of Supervisors regarding Item 31. Moving to approve the Board’s salary increase within the \$10.8 billion budget, Supervisor Don Wagner made a brief comment summarized below about the rationale on why the Board’s salary increase was warranted,

“Thank you, Mr. Chairman, and we have gone through the budget somewhat extensively last time, so I will move all of the items that are in front of us. And, in particular, it does seem we have seen some press; we heard some comments here about Item 31, which is the salaries for members of the Board of Supervisors. And I just want to make sure we put it in context.

Today, we’ve seen an effort throughout this agenda to essentially right-size the executive pays throughout the County—our CEO, our Sheriff, our elected department heads. We have previously dealt with the District Attorney. And as to the Board, this is something that hasn’t been done in the last 20 years. And so, we are the 6th largest county in the United States, the 3rd largest in California. We are being raised only to be equal to the judges in the Orange County Superior Court. Their salaries are not set by the judges, are not set by the Board of Supervisors; it is set at the state level. So, there is no gaming the system by us.

And it is also fair—I think everybody on the Board recognizes—the work this Board does is broader, and we have more roles and responsibilities than even do those Superior Court judges, with respect to all of them who do, in fact, work quite hard. But at the end of the day, this is all an item whose time has come. The entire budget is sound. We are throwing challenges at Ms. Aguirre just today on funding certain items, but at the end of the day, I am sure she will rise to the challenge. And I move approval of the entire budget.”

(Orange County Board of Supervisors Meeting in the afternoon of June 24, 2025, and meeting time at 2:38:05 to 2:39:45) ⁶

REASON FOR STUDY

If elected officials vote to increase their own personal compensation, they are the direct beneficiaries of their own votes. Therefore, the appearance of self-dealing (conflict of interest) should be anticipated. The Orange County Board of Supervisors approach to their recent 25% salary increase has led to much public criticism, and formal citizen’s complaints have been filed with the Grand Jury. These factors collectively compelled the Grand Jury to initiate an investigation.

Compensation for elected officials should be approached with the upmost transparency and supported by commensurate data. The Orange County Board of Supervisors’

⁶ [Board Meeting Afternoon](#)

approach to introducing the agenda item on the June 10th and June 24th Boards's meetings has undermined the Board's credibility and the public trust. In addition, no comparative analysis of local county supervisors' compensation was publicly provided.

The Grand Jury is explicitly *prohibited* from investigating county policy decisions. Consequently, the Grand Jury does not question the Board of Supervisors' policy decision to increase their salaries. Instead, the focus of this inquiry was on the approach, methodology, and inadequate public disclosure surrounding the decision to implement the salary increase.

This investigation aims to uncover the timing of the salary increase and identify who ultimately made the decision to include it—and obscure it—in the board agenda

METHOD OF STUDY

The Orange County Grand Jury's objective is to provide an accurate record of the recent salary increase that the Board of Supervisors voted for themselves.

The Grand Jury investigation relied on confidential interviews, public documents, letters of complaint to the Orange County Grand Jury, and news accounts about the salary increase. The facts, findings, and recommendations in this report are corroborated, validated, and verified through multiple sources.

The Orange County Grand Jury:

- ❖ Conducted confidential interviews with numerous Orange County executives and senior level staff directly involved in meeting agenda planning pertinent to the Orange County Supervisors' salary increase
- ❖ Reviewed published articles related to the subject.
- ❖ Requested, received and reviewed documents relevant to the investigation.
- ❖ Reviewed appropriate meeting videos and read Board of Supervisors' published Agendas and Meeting Minutes.
- ❖ Reviewed the historical Board of Supervisors compensation ordinances, competitive salary data from the California Transparency website, relevant websites and publicly available documents.
- ❖ Evaluated public complaint letters.

- ❖ Attended the Orange County Supervisors' bi-weekly meeting on August 12th and watched online, which was the first public meeting following the June 24th vote to monitor public comments.

INVESTIGATION AND ANALYSIS

The 1998-1999 Orange County Grand Jury investigated the then recent Supervisors' salary increase. A finding in the report stated that the current system does not give taxpayers a realistic opportunity to voice their opinions about salary policy (**Error! Reference source not found.**). Twenty-five years later, the same finding can be made once again.

The County of Orange has an extensive process by which annual budgets and business priorities are determined including competitive compensation surveys for salary changes. Community input is sought, and policies made to assure public services are maintained to the highest standards and government services continue uninterrupted.

The process employed by the County is highlighted below

BUDGET PLANNING & DEVELOPMENT PROCESS

The County's budget development process begins in January when the CBFO issues budget policies and detailed instructions for County departments including a calendar establishing completion dates for key budget development events. A request of public input is made in February and incorporated into the budget process with the departments and CBFO.

The CBFO, in coordination with the County Auditor-Controller's Office, establishes the level of non-departmental, Countywide revenues projected to be available to the County. County departments prepare budget requests and submit them in early March to the CBFO. The County Executive Officer (CEO), Chief Financial Officer (CFO) and CBFO staff meet with departments to discuss the requests. After extensive review and collaboration, including recommendations provided by the CEO and CFO, the budget is then compiled, balanced and undergoes a final review by the CBFO, CFO and CEO before the Recommended Budget is published.

In May, the CBFO plans and conducts briefing sessions for the Board staff members and the CEO and CFO conduct individual briefings with Board members. During the Public Hearings in early June, the CEO presents the budget, and the Board casts straw votes and provides direction. Subsequently, prior to the end of June, the Board adopts the budget on a simple majority vote. The adopted budget becomes the spending plan and spending limit for County departments.

The Recommended Budget serves as the County's baseline budget and excludes requests from departments for additional resources, known as augmentations, to either maintain or expand current levels of service; these requests are included under separate cover in the budget augmentation requests document. The annual budget reflects Board-approved augmentations.

The budget calendar can be found on pages 22-23 of this document. Additional budget information and glossary can be found in the budget books on the [County's website](#).

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7

Following this extensive process, public documents are published which highlight the County priorities and funding. These include:

- *Citizen Guide to Fiscal Year (FY) 2025 - 2026 Budget*. This did not include any references to Board of Supervisors' salary increase.⁷
- *FY 2025 – 2026 Recommended Budget from Public Workshop of May 29, 2025*. This did not include any reference to Board of Supervisors' salary increase.⁸

Neither of the above documents indicate a consideration of salary increases for the Board of Supervisors or an increase to the Board of Supervisor's departmental budgets. The rationale given for not listing the Board of Supervisors' salary increase in any of the working documents by Orange County executive management team members was that a consideration of the salary increase occurred late in the planning process, and that the amount in question had a minimal budget impact.

At the June 24th, 2025, meeting, Supervisor Janet Nguyen proposed a one-time budget increase of approximately \$143,000 to each Supervisor's departmental budget. This adjustment effectively offset the financial impact of the recently approved 25% salary hike, ensuring that the raises did not reduce available funds within their individual office budgets. In addition to covering the cost of the salary increase, the expanded budgets provided each Supervisor with additional discretionary funds—raising further concerns about fiscal priorities and transparency during a period of countywide budget constraints.

In Fiscal Year (FY) 2025-2026, The Board of Supervisors' personal office budget total was increased to \$10.5 million, which is divided equally among each Board member to handle office expenses, salaries and community outreach.

Each Supervisor is authorized up to twelve staff members, up to a potential sixty staff members in total, in support of their official duties and engagement with community outreach in their respective districts.

- FY 2024-25 Office Budget of each Supervisor was \$1,958,971.
- FY 2025–26 Office Budget of each Supervisor was increased to \$2,101,971 (meeting on June 24th, 2025).

The figure below is the Orange County Supervisor's "Total Compensation Package" that was approved on June 24th, 2025.

⁷ [Citizen's Guide to FY 2025-26 Budget-FINAL.pdf](#)

⁸ [Public Budget Workshop - Recommended Budget FY 2025-26](#)

A Breach of Public Trust in Orange County

Current Board of Supervisor Base Pay	\$244,000 (effective October 3 rd , 2025)
Additional cost of Benefits Package	\$53,680
Annual Car Allowance	\$7,200
TOTAL COMPENSATION	\$304,880

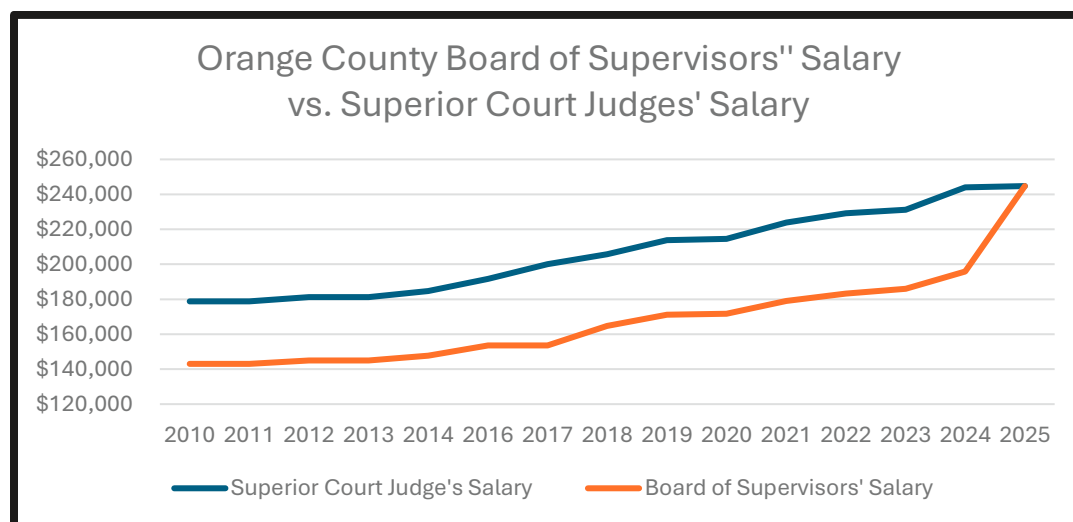
Benefits Package includes – health plan options, retirement plan contribution to a defined benefit plan, family leave plan, paid time off, employee assistance program, wellness program, disability insurance, and free parking.

Their base salary above does not include payments from appointments to other governmental boards and commissions.

For comparison purposes, the current Governor of California base pay is \$242,295. The Board of Supervisors' salary increase places their salaries higher than the Governor of California. For additional reference purpose, a US Senator and a member of the US House of Representative base pay is \$174,000.

The Board of Supervisors' action on June 24th, 2025, changed the historical formula of how the Board of Supervisor's compensation was determined. In 2005, the Board of Supervisors adopted an ordinance binding their compensation to 80% of the regular annual salary of California Superior Court Judges. Thus, as Judges' salaries increased annually so did the Board of Supervisors' salary increase. For over 24 years, the Board of Supervisors' salaries was a settled matter.

The below figure demonstrates the salary increase of the Orange County Board of Supervisors and the Superior Court Judges from 2010 to the present.



The Orange County Grand Jury sought to determine what prompted the recommendation for a salary increase at this particular time. The rationale or reasons provided by the Orange County executive team were basically, (1) a new Board

member joined the Board in November of 2024, and raised the subject of the Orange County Board of Supervisors' compensation, and whether it was competitive; (2) the amount of the salary increase was immaterial to the overall budget (a rounding error in the \$10.8 billion budget).

Litigation is currently underway in the State of California that could lead to even more compensation and even retroactive pay for the Board of Supervisors. This litigation is based upon the premise that the Superior Court Judges' salaries have been under-calculated in recent years. Their salaries are based upon the average State of California employees' cost of living increases, which the litigants claim, was not computed correctly. If the judges' litigation is successful, the 100% formula will automatically increase the Board of Supervisors' salaries beyond the current projected salary of \$244,000, and plus any additional back pay awarded. Information on the litigation may have been available to the Board of Supervisors because a current Supervisor's spouse is a Superior Court Judge. This fact may have possibly influenced the timing of the Board of Supervisors' salary increase vote.

"California judges make a good living. They earn at least \$240,000 and can count on a raise just about every year, a requirement that's written into state law.

So why do they feel shortchanged by the state?

A coalition of them argues the state has been stiffing them for years by mishandling the formula it uses to calculate their wage increases. In a new lawsuit, one such judge is demanding that the state redo the math going back almost a decade to include information that likely would have resulted in bigger raises.

"There's a reason why our latest pay increases have been so puny and falling far short of the rate of inflation. The state didn't tinker with the statutory formula, but it seems to have played with the inputs," said a statement announcing the lawsuit by a group called the Alliance of California Judges.

A lot of money is on the line. An appeals court justice filed a similar lawsuit a decade ago, and the state had to cough up \$40 million after losing the case.

The formula at the heart of the lawsuit sounds simple. State law requires that judges receive annual raises based on the "average percentage salary increase" given to other California state employees. This year, judges received a 2.6% wage increase, down from 3.2% in the previous year."

Author Adam Ashton is a deputy editor supervising CalMatters

Some Orange County executive management team members clearly indicated they were aware of the Judges' litigation, and some were not. Another concern to the Grand Jury is the fact that the executive management team voiced reservations regarding the salary increase to the Grand Jury but did not voice these same reservations to the Board of Supervisors. The executive management team could not explain the reason that they did not attempt to influence the Board of Supervisors on this matter.

If a culture exists within the County of Orange in which the executive management team feel unable to offer their best professional judgment, then the system of checks and balances essential to good governance is at serious risk.

As part of the Orange County Grand Jury investigation, the Grand Jury queried as to whether staff were asked to provide any competitive compensation salary data to the Orange County Board of Supervisors prior to their deliberations. Staff indicated that there was no formal request by the Board to initiate a salary study. However, the Orange County Finance Department was asked to provide data on San Diego County Supervisors' salaries —rather than requesting this information from the Orange County Human Resources Department, which, according to policy, is responsible for advising on county compensation practices. Per the County of Orange Personnel and Salary Resolution (PSR), the Chief Human Resource Officer is authorized to conduct compensation studies to maintain competitive pay practices for all county jobs. During our investigation, we found that the Orange County Human Resource Department was not requested to perform a study for the Board of Supervisors. The Grand Jury was unable to determine why the Finance Office was tasked with completing a limited salary study while the Human Resources Department was excluded from the process.

The Grand Jury decided as part of their investigation to conduct a salary analysis for the Board of Supervisors' position. The comparisons of other Southern California Board of Supervisors' salaries were completed. The challenge with this type of analysis is that it is a snapshot in time with different counties having different responsibilities and challenges. Also, these types of salary comparisons can lead to spiral increases. As one jurisdiction increases, so do all the others over time as the benchmark data increases.

For comparison purposes, it was found that the Orange County Board of Supervisors are now the second highest salary paid in Southern California. This does not take into consideration the potential increase of the Superior Court Judges' salaries due to current litigation, if it is successful.

Board of Supervisor Base Pay in Southern California Counties:

Los Angeles	\$301,725
Orange	\$244,000
San Bernardino	\$236,265
San Diego	\$233,698
Riverside	\$214,410
Imperial County	\$194,325
Ventura	\$172,115
Santa Barbara	\$119,480

In 2024 the average Board of Supervisor pay in California was \$131,367 with a typical range of \$84,869 - \$173,290.

As part of its due diligence, below are all other Orange County elected officials' base salaries.

County Auditor and Controller	\$236,960
County Clerk Recorder	\$236,960
County Treasurer – Tax Collector	\$236,960
County Assessor	\$236,960
District Attorney	\$373,945
Sheriff Coroner	\$354,640

While the Board of Supervisors followed appropriate legal procedures to amend the ordinance governing their salary increases, the increase was not specifically called out in the June 10th, 2025, meeting agenda. It required a reading of the ordinance change in a first public hearing on June 10th, 2025, and a second reading and adoption at the meeting on June 24th, 2025. The published agenda and the readings during the meeting made it difficult for the public to fully understand the Board of Supervisors' actions. In essence, the Board orchestrated a substantial salary increase for themselves in a manner that left most observers unaware of what had truly occurred.

Here is an excerpt of the Board of Supervisors Agenda for June 10th, 2025. The exact verbiage of the Supervisors' salary increase is buried in the last 4 lines of the Agenda Item 3.

<u>GENERAL ADMINISTRATION</u>	
3.	County Executive Office - <u>Hold Public Hearing</u> to consider adoption of FY 2025-26 Recommended Budget - All Districts
	A. Opening Remarks
	B. Executive Summary
	C. Public Comments
	D. Board Comments
	E. Program I Public Protection
	F. Program II Community Services
	G. Program III Infrastructure & Environmental Resources
	H. Program IV General Government
	I. Program V Capital Improvements
	J. Program VI Debt Services
	K. Program VII Insurance, Reserves & Miscellaneous
	L. Executive Recap
	M. Closing Remarks
	(All or part of which may be considered on 6/11/25) Set final budget adoption for June 24, 2025, 9:30 a.m.; consider first reading of "An Ordinance of the County of Orange, California, Amending Section 1-2-7 of the Codified Ordinance of the County of Orange Establishing the Salary of the Members of the Board of Supervisors"; and set second reading and adoption for 6/24/25, 9:30 a.m.

The below is the Agenda Staff Report of the June 10th, 2025, Agenda Item 3 that shows the salary increase is going to be 100% of the Superior Court Judges' salaries.

AGENDA STAFF REPORT		Agenda Item
		ASR Control 25-000350
MEETING DATE:	06/10/25	
LEGAL ENTITY TAKING ACTION:	Board of Supervisors	
BOARD OF SUPERVISORS DISTRICT(S):	All Districts	
SUBMITTING AGENCY/DEPARTMENT:	County Executive Office (Approved)	
DEPARTMENT CONTACT PERSON(S):	Liza Le (714) 834-4104 Oana Cosma (714) 834-7410	
SUBJECT: FY 2025-26 Public Budget Hearings and Salary Ordinance for Board of Supervisors		
CEO CONCUR Concur	COUNTY COUNSEL REVIEW No Legal Objection	CLERK OF THE BOARD Public Hearing 3 Votes Board Majority
Budgeted: N/A	Current Year Cost: See Financial Impact Section	Annual Cost: See Financial Impact Section
Staffing Impact: See Staffing Impact Section	# of Positions:	Sole Source: N/A
Current Fiscal Year Revenue: N/A	County Audit in last 3 years: No	
Funding Source: N/A		
Levine Act Review Completed: N/A		
Prior Board Action:	1/28/2025 #29, 5/25/2005 #42, 12/12/2000 #23	
RECOMMENDED ACTION(S):		
1. Open the Fiscal Year 2025-26 Public Budget Hearings (Government Code Section 29080). 2. Consider the Recommended Fiscal Year 2025-26 Budget and County Executive Office recommendations on Budget Augmentation Requests. 3. Upon receipt of all changes/modifications to the Fiscal Year 2025-26 Recommended Budget by the Board of Supervisors, close the Fiscal Year 2025-26 Public Budget Hearings and set June 24, 2025, 9:30 a.m. for final budget adoption. 4. Read the title of ordinance. 5. Order further reading of the ordinance be waived. 6. Consider the matter. 7. Direct ordinance be placed on agenda of the next regularly scheduled Board meeting for adoption. 8. At the next regularly scheduled meeting, consider the matter, and adopt the ordinance.		
SUMMARY:		
The County Executive Office requests that the Board of Supervisors conduct the Fiscal Year 2025-26 Public Budget Hearings in accordance with California Government Code 29080 (b) whereby, "On the date stated in the notice, not fewer than 10 days after the recommended budget documents are available, and at a time and place also stated in the notice, the board will conduct a public hearing on the recommended budget." An Ordinance of the County of Orange, California, amending Section 1-2-7 of the Codified Ordinances of the County of Orange, to calculate the salary of members of the Board of Supervisors at a rate equal to 100% of Superior Court Judges and maintain that correlation as judge's salaries are adjusted.		

The following is the Agenda Notice of the June 24th agenda item 76 that approves the Board of Supervisors' salary going to 100% of the Superior Court Judges' salary (last 2 lines of the agenda item).

76. Adopt FY 2025-26 Final Budget Resolution; approve various Internal Service Fund billing rates; approve FY 2025-26 employee and employer retirement contribution rates; direct Human Resource Services to amend the Master Position Control; amend Board Offices Budget Policy and direct County Executive Office to re-evaluate peer counties' budgets every fiscal year, effective FY 2025-26; establish District Attorney Special Appropriations and Vehicle Theft Task Force Special Funds; establish Sheriff Special Appropriations Fund and Regional Narcotics Suppression Program; adopt resolutions authorizing temporary transfers of funds; direct Auditor-Controller to make related payments and reimbursements; approve FY 2025-26 County Master Events Calendar and approve FY 2025-26 Charitable Organization Activities Plan and make related findings per Government Code Section 26227; adopt resolution approving Sponsorship Marketing Plan and making related findings; adopt resolution approving United Way of Orange County to conduct FY 2025-26 charitable campaign and making related findings; receive and file FY 2025-26 annual list of County Ad Hoc Committees; adopt resolution establishing County Business Travel and Meeting policy, superseding Resolution 24-083; approve revised classification specifications and title descriptions and set related pay grade, effective 6/27/25; approve and adopt Side Letter Agreements with Teamsters, Local 952 and Orange County Employees Association; and adopt revisions to Personnel & Salary Resolution, effective 6/27/25 - All Districts

As previously stated, the Board's agenda item for June 24th, 2025, was published without clearly conveying the Board's intention. During the Board's meeting, Vice Chair Supervisor Foley asked for the salary increase item to be pulled for discussion so she could vote "no". Supervisor Wagner made a brief remark that the Board of Supervisors' salary increase was justified. No other board members spoke. In addition, there was no public comment - perhaps the public was not aware of what the agenda item meant in increasing the compensation of the Board of Supervisors.

The below is an excerpt of the June 24th, 2025, Board of Supervisors Meeting Minutes which is a voting record on Item 76 taken during the meeting.

76. Adopt FY 2025-26 Final Budget Resolution; approve various Internal Service Fund billing rates; approve FY 2025-26 employee and employer retirement contribution rates; direct Human Resource Services to amend the Master Position Control; amend Board Offices Budget Policy and direct County Executive Office to re-evaluate peer counties' budgets every fiscal year, effective FY 2025-26; establish District Attorney Special Appropriations and Vehicle Theft Task Force Special Funds; establish Sheriff Special Appropriations Fund and Regional Narcotics Suppression Program; adopt resolutions authorizing temporary transfers of funds; direct Auditor-Controller to make related payments and reimbursements; approve FY 2025-26 County Master Events Calendar and approve FY 2025-26 Charitable Organization Activities Plan and make related findings per Government Code Section 26227; adopt resolution approving Sponsorship Marketing Plan and making related findings; adopt resolution approving United Way of Orange County to conduct FY 2025-26 charitable campaign and making related findings; receive and file FY 2025-26 annual list of County Ad Hoc Committees; adopt resolution establishing County Business Travel and Meeting policy, superseding Resolution 24-083; approve revised classification specifications and title descriptions and set related pay grade, effective 6/27/25; approve and adopt Side Letter Agreements with Teamsters, Local 952 and Orange County Employees Association; adopt revisions to Personnel & Salary Resolution, effective 6/27/25; and consider second reading and adoption of "An Ordinance of the County of Orange, California, Amending Section 1-2-7 of the Codified Ordinances of the County of Orange Establishing the Salary of the Members of the Board of Supervisors" - All Districts

34125 **APPROVED AS RECOMMENDED WITH VICE CHAIR FOLEY VOTING NO ON RECOMMENDED ACTION NO. 31 (SECOND READING AND ADOPTION OF ORDINANCE ESTABLISHING SALARY OF MEMBERS OF THE BOARD OF SUPERVISORS)**

RESO: 25-075 - 25-079
ORD: 25-012

Please see Appendix C or the latest updated Orange County Ordinance Section 1-2-7 which details the new salary methodology for the Board of Supervisors.

Following the actions of the June 10th and 24th Board of Supervisors meetings, the media reported on the salary vote and numerous editorials were written. After public outcry, Supervisor Sarmiento and Chairman Chaffee stated that they would donate their salary increase to charity.

An important question now is why the matter has not been revisited since one supervisor voted “no” and two supervisors publicly stated they would donate their raises. It appears that most of the Orange County Board of Supervisors have reconsidered their decisions that the salary increase was appropriate.

The Board of Supervisors’ decision to approve their own salary increase, and the process by which it was implemented, has sparked significant concerns regarding transparency and public accountability. Given the politically sensitive nature of such a move, it is unlikely that the item would have been placed on the agenda without prior confidence they would be securing at least three affirmative votes. This raises the possibility that informal communications—potentially non-verbal or conveyed through staff briefings—may have signaled consensus among most of the Supervisors, in potential violation of the Brown Act. This Act prohibits the Supervisors or their intermediaries from engaging in a series of communications outside a public meeting that leads to coordination or agreement on matters within their jurisdiction. Although the Grand Jury did a very deliberative and thorough investigation, it found executive management team members were not forthcoming in answering our key questions:

- Why did they disguise the salary increase in the agenda?
- Why was a salary increase warranted at this time?
- Who initiated the salary increase?

Despite repeated efforts, the Grand Jury was unable to determine who orchestrated the Board of Supervisors’ salary increase in June 2025, who directed the obfuscation of the agenda item to conceal the raise, or whether any violations of the Brown Act occurred in the process. This stemmed from misdirection and incomplete responses from County executive management team members, which impeded the Grand Jury’s ability to uncover the truth. Confronted with the choice between continuing to pursue meetings that were repeatedly postponed, the invocation of attorney-client privilege, and a lack of cooperation from executive and support staff, who were unable or unwilling to recall key events or issuing a timely report while the matter remained both relevant and potentially reversible, the Grand Jury opted for the latter. The Grand Jury’s findings and

recommendations aim to bring transparency to the matter and prompt corrective actions before public trust is further eroded.

If the salary increase had been introduced as a standalone item and subjected to a more vigorous and transparent debate, the measure might still have passed, but with far less public backlash. A clear and open discussion would have demonstrated respect for the electorate and helped restore trust in the Orange County Board of Supervisors' decision-making process. Instead, the timing and manner of this approval—coming just ahead of sensitive county labor negotiations—has only deepened public skepticism. The perception that controversial decisions are being made out of view, not only erodes trust but also risks undermining the legitimacy of future negotiations and governance.

Per legal professionals in service to the County of Orange – they were not asked for input on the salary increase by the Board of Supervisors. They have stated to the Grand Jury, the Board of Supervisors' salary increase was ill-timed and may have been better considered in the County 2025 – 2026 Budget Cycle.

In Simon Sinek's book, "Leaders Eat Last" he wrote,

"The true price of leadership is the willingness to place the needs of others above your own. Great leaders truly care about those they are privileged to lead and understand that the true cost of the leadership privilege comes at the expense of self-interest."

FINDINGS

In accordance with California Penal Code §933 and §933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency affected the Findings presented in this section. Responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation “A Breach of Public Trust in Orange County” the 2025-2026 Orange County Grand Jury has arrived at five findings, as follows:

- F1** On June 24th, 2025, the Orange County Board of Supervisors (“Board”) approved an ordinance authorizing salary increases for themselves with minimal public notice, limited discussion, and no meaningful opportunity for community input without explicitly listing the item as “salary increase” on the meeting agenda.
- F2** The County of Orange lacks a formal established, independent review process for evaluating or recommending changes to the Board of Supervisors’ compensation.
- F3** Although one Supervisor voted “no” and two others pledged to donate their salary increases to charity in response to public outcry, the Board has not reversed or reconsidered the decision to increase their salaries.
- F4** The ongoing lack of transparency and apparent self-enrichment among Board members have deeply disappointed many Orange County residents and county employees.
- F5** The Grand Jury’s investigation was impeded by repeated meeting postponements, the invocation of attorney-client privilege, and a lack of cooperation from executive and support staff, who were unable or unwilling to recall key events. As a result, the Grand Jury was prevented from obtaining answers to critical questions.

RECOMMENDATIONS

In accordance with California Penal Code Sections 933 and 933.05 the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) Responses from each agency affected the Findings presented in this section. Responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury makes the following recommendations:

- R1** By March 31, 2026, the Board of Supervisors should implement one of the following accountability measures:
- Request an Independent Compensation Review in accordance with California Penal Code §927, immediately petitioning the Orange County Grand Jury to conduct an impartial review of Board compensation. This would provide a credible, third-party assessment and help restore public confidence.
 - Schedule a Voter Oversight Referendum consistent with Proposition 12 (California, 1970), California Constitution Article XI, Section 1(b), and Orange County Charter Section 201 for public review and approval. [F3]

OR

- R2** By March 31, 2026, the Board should rescind the ordinance No. 25-012 or parts thereof, which authorized the most recent salary increase, or take other appropriate steps to rescind the salary increase with the intent to restore institutional trust and demonstrate a genuine commitment to transparency and accountability. [F3]
- R3** By March 31, 2026, the Board should establish a new County ordinance that clearly defines the procedures for proposing, reviewing, and approving future salary adjustments for Board members. This framework should include public hearings and documentation requirements to ensure accountability. [F1, F2]
- R4** By March 31, 2026, the Board should align its salary deliberations with the County's annual budget process, including a public review period. This timeline allows for early and sustained community engagement, ensuring that compensation decisions are made in full view of the public. [F4]
- R5** By March 31, 2025, The Board should require by ordinance that any future salary adjustments for Board members be accompanied by a clear and accessible public notice which outlines the referendum process and provides a minimum 90-day window for public challenge, in accordance Orange County Charter Section 20. [F1, F2]

REQUIRED RESPONSES

California Penal Code (§933; 933.05) regarding **required** and **requested** responses.

Orange County Board of Supervisors

90-day Response Required

Findings:

F1, F2, F3, F4, F5

Recommendations:

R1, R2, R3, R4, R5

GLOSSARY AND ACRONYMS

Elected Officials	Elected officials are individuals who hold public office as a result of being chosen by voters in an election. They are entrusted with the responsibility to represent the interests of their constituents and to make decisions on public policy, laws, and governance. Examples include mayors, city council members, governors, legislators, and members of boards such as county supervisors or school boards.
Grand Jury	A grand jury is a legal body empowered to conduct official proceedings to investigate potential criminal conduct and determine whether criminal charges should be brought.
Indictment	An indictment is a formal written accusation that a person has committed a crime. It is issued by a grand jury after reviewing evidence presented by a prosecutor and determining that there is probable cause to believe the individual committed the offense.
Obfuscation	The act of making something unclear, confusing, or difficult to understand, often deliberately. It can involve using vague language, complex jargon, or indirect communication to hide the true meaning, intent, or facts.
OC	Orange County

BIBLIOGRAPHY

This report includes pertinent reference materials, such as letters, Board of Supervisors resolutions, and excerpts from laws and regulations (especially applicable California Codes).

After approving their own wage hike, two OC supervisors commit to donating the salary increase – [After approving their own wage hikes, two OC supervisors commit to donating the salary increase – Orange County Register](#)

“Budget Planning and Development Process” [Citizen's Guide to FY 2025-26 Budget-FINAL.pdf](#)

California County Supervisors Salaries [All salaries | Transparent California](#)

California judges say they're underpaid, and their new lawsuit could cost taxpayers millions. [California judge sues state and demands it recalculate raises - CalMatters](#)

Citizen's Guide to FY 2025-26 Budget Final – [Citizen's Guide to FY 2025-26 Budget-FINAL.pdf](#)

Central District of California – [Central District of California | Former Orange County Supervisor Sentenced to 5 Years in Prison for Bribery Scheme Involving More Than \\$10 Million in COVID Funds | United States Department of Justice](#)

Ex-OC supervisor Andrew Do Sentenced to 5 years in prison over corruption scheme – [Ex-OC supervisor Andrew Do sentenced to 5 years in prison over corruption scheme | LAist](#)

How did a 22-year-old law student afford a \$1 million home at the center of civil fraud allegations? – [How did a 22-year-old law student afford a \\$1 million home at the center of civil fraud allegations? | LAist](#)

It Not Just The Airport Fire: County Legal Payouts Total \$258 Million Over Four Years [It's Not Just The Airport Fire: County Legal Payouts Total \\$258 Million Over Four Years](#)

OC Board of Supervisors approves new county new county budget, pay raise for several top officials – [OC Board of Supervisors approves new county budget, pay raises for several top officials – Orange County Register](#)

Orange County Board of Supervisors meetings Live & Archived Audio [Board of Supervisors Meeting Agendas | Orange County Board of Supervisors](#)

Orange County Official Website Orange County | <https://www.ocgrandjury.org/>

OC Supervisors Set to Quietly Give Themselves a 25% Raise [OC Supervisors Set to Quietly Give Themselves a 25% Raise](#)

OC Vice Chair Katrina Foley Release Statement – [OC Vice Chair Katrina Foley Releases Statement Following Board of Supervisors Meeting Where the Board Voted to Approve the 2025-26 Budget, Didi Hirsch Contract, Traffic Reduction, and John Wayne Airport | Fifth District Supervisor Katrina Foley](#)

REGULAR MEETING OF THE Orange County BOARD OF SUPERVISORS agenda for June 6, 2025 [cams.ocgov.com/Web_Publisher/agenda06_10_2025.htm](#)

REGULAR MEETING OF THE Orange County BOARD OF SUPERVISORS minutes for June 6, 2025,
[https://ocgov.granicus.com/DocumentViewer.php?file=ocgov_f075ed74a5d885dab9e5d5603c52039e.pdf&view=](#)

REGULAR MEETING OF THE Orange County BOARD OF SUPERVISORS Agenda for June 24, 2025. [cams.ocgov.com/Web_Publisher/agenda06_24_2025.htm](#)

REGULAR MEETING OF THE Orange County BOARD OF SUPERVISORS Meeting Minutes for June 24, 2025, [DocumentViewer.php](#)

“Sec. 1-2-7. - Compensation for Board of Supervisors from June 2005”. [ARTICLE 1. - BOARD OF SUPERVISORS | Code of Ordinances | Orange County, CA | Municode Library](#)

APPENDIX A



MEMBER BENEFITS

REPRESENTATION

VECEC INSURANCE

NEWS & EVENTS

MY HEALTH & SAFETY

ABOUT OCEA

COUNTY NEGOTIATIONS

★ IN THIS SECTION

CALENDAR

OCEA NEWS

OCEA MEDIA BRIEF

LOGIN / REGISTER





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WWW.OCEA.ORG > NEWS & EVENTS > OCEA NEWS > GUESS WHO'S GETTING A 25% RAISE!

GUESS WHO'S GETTING A 25% RAISE!

Dear OCEA member,

Last week, the Orange County Board of Supervisors voted 4-1 to give themselves a 25% raise, with Supervisor Katrina Foley providing the only dissenting vote. The County CEO and County Counsel also received significant raises. "Orange County Supervisors Now Make More Than California's Governor," the Voice of OC [reported](#).

This decision is insulting, especially as the County tells its workers "to reduce costs, we need hard freezes and spending restrictions," and to "prepare for uncertain times." Front-line staff serve the most vulnerable with fewer resources (like eliminating desktop printers), while top officials reward themselves instead of prioritizing community needs.

The "County family" message rings hollow when executives put themselves first. OCEA members work around the clock for the public, yet the Board meets only twice a month. Rewarding such limited service with a 25% pay increase, on top of car allowances and huge staff budgets—while claiming budget woes—is pure hypocrisy.

In his book, "Leaders Eat Last," leadership guru Simon Sinek wrote that "leadership means giving to others first." When leaders take for themselves, they lose trust. We urge the Board to reconsider their raise and meet with front-line workers to understand how the current budget impacts services and morale. County employees are told to cut spending and hiring while maintaining the same level of services and standards. The Board must see how out of touch they are with those serving the community.

We'll send this message to the Board of Supervisors and County CEO so they know how their actions effect staff. We need leaders who truly "eat last."

In Frustration and Solidarity,

Team OCEA

Publication Date: June 30, 2025

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OCEA Calendar

g for a member leader position in OCEA? Apply now!



APPENDIX B

The 1999 Orange County Grand Jury Report regarding Board of Supervisors' SALARY METHODOLOGY

"SUMMARY

*During the current fiscal year, the Board has presented two ordinances for increase in Board salaries without notifying the public that these increases were **subject to referendum**.*

*Prior to the passage of State of California Proposition 12 in 1970, the State Legislature set the salary of the Board of Supervisors. The ballot language of Proposition 12 amended Article XI, §1, subdivision (b) of the California Constitution. Proposition 12 reads as follows: "COMPENSATION OF COUNTY SUPERVISORS. Legislative Constitutional Amendment. Provides that county governing body, rather than Legislature, shall prescribe compensation of its members by an ordinance that is **subject to referendum**." (Emphasis added.)*

Proposition 12 was approved by the voters. Orange County methodology for meeting the requirements of Proposition 12 are to present an ordinance providing for an increase in salary for the Board of Supervisors on the Agenda for the meeting of the Board. The ordinance is held for at least 5 days for a required second reading. During 1998–99, the first ordinance increased salaries to be received, and the second ordinance recommended deferred salary benefit. The first reading of the second increase, deferred salary, occurred on December 15, 1998, as Item 79. The second reading when the ordinance was "APPROVED AS RECOMMENDED" occurred on January 12, 1999.

The Grand Jury questions the current methodology for increasing Board of Supervisors' salaries.

FINDING:

Under California Penal Code Sections 933 and 933.05, responses are required to all findings. The 1998–99 Orange County Grand Jury has arrived at one major finding.

*The **Board of Supervisors** is required to respond to the finding.*

- 1. The system in current use does not give taxpayers a realistic opportunity to voice their opinions about salary policy. Voters do not receive Board of Supervisors Meeting Agenda. Even if the average citizen became aware of the ordinance proposing a salary increase for supervisors, appearance before the Board to voice objection*
- 2. provides no timely or affordable method to ensure that the ordinance would then be decided by referendum. Therefore, the present method of granting salary increases nullifies the intent of Proposition 12, which is to give voters veto power over proposed salary increases for members of the Board of Supervisors.*

RECOMMENDATION:

*In accordance with California Penal Code Sections 933 and 933.05, each recommendation must be responded to by the government entity to which it is addressed. These responses are submitted to the Presiding Judge of the Superior Court. **The Board of Supervisors** is required to respond to the recommendation. Based on the finding, the 1998–99 Orange County Grand Jury recommends that:*

- 1. The Orange County Board of Supervisors should place the matter of all future Board salary increases on the ballot of the next regularly scheduled Orange County election after adoption of the ordinance by the Board."*

APPENDIX C

Updated Ordinance of Orange County Amended Section 1-2-7, page1 of 2

Attachment R

ORDINANCE NO. _____

AN ORDINANCE OF THE COUNTY OF ORANGE, CALIFORNIA,
AMENDING SECTION 1-2-7 OF THE CODIFIED ORDINANCES OF
THE COUNTY OF ORANGE ESTABLISHING THE SALARY OF THE
MEMBERS OF THE BOARD OF SUPERVISORS

The Board of Supervisors of the County of Orange ordains as follows:

SECTION 1. Section 1-2-7 of the Codified Ordinances of the County of Orange is hereby amended to read as follows:

Sec. 1-2-7. Compensation for Board of Supervisors.

(a) Effective February 10, 2001 each member of the Board of Supervisors shall be compensated for his or her services as such member by salary at the rate of one hundred eight thousand dollars (\$108,000.00) per annum. No member of the Board of Supervisors shall receive any compensation, in addition to that provided for by this section, for services rendered as a member of the Board.

(b) Effective July 1, 2002, and on the same date each succeeding calendar year, the salary for each member of the Board of Supervisors shall be increased by twelve (12) percent.

(c) Effective October 3, 2025, the rate of pay for each member of the Board of Supervisors shall be set as a biweekly rate of pay based on subsection (d) below. The biweekly rate shall be consistent with the regular payroll cycles of the County's payroll operations and shall be paid at the same times and in the same manner as for County employees generally.

(d) Notwithstanding the provisions of subsection (b) above, the salary for a member of the Board of Supervisors shall be set at an annual base salary rate equal to the regular annual salary prescribed by State law and as adjusted by State law for judges of the Superior Court of the State of California.

(e) If any provision of this section, or the application thereof to any person in any circumstance, is held invalid, the remainder of the section, or the application of such provision to other persons and to other circumstance, shall not be affected thereby. The Board of Supervisors expressly declares its intention that subsection (b) of this section shall be fully operative and effective except as limited by subsection (d), and that if subsection (d) should be declared invalid, there should be no limitation upon the effectiveness or operability of subsection (b). The Board of Supervisors would have enacted subsection (b) without regard to subsection (d). Subsection (b) shall be deemed severable from subsection (d). If subsection (d), or any provision thereof is held invalid, then subsection (b) shall be deemed, notwithstanding such invalidity, to be fully effective and operable during the period of invalidity of subsection (d) preceding the determination of invalidity as well as thereafter.

(f) Each member of the Board shall also be provided with either the use of a County provided automobile or an automobile allowance, such health and welfare benefits and life

Ordinance No. _____

Page 1 of 2

Attachment R

insurance benefits and retirement as provided County Executive Management-Group I employees, and a contribution of six (6) percent of salary to a County offered deferred compensation plan.

(g) This compensation shall not be in lieu of any compensation for any service in any other capacity or on any other board or commission.

SECTION 2. This ordinance shall take effect sixty (60) days after adoption.

Ordinance No. ____

Page 2 of 2

APPENDIX D



2022 PSR - Updated
9.11.2025.pdf



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Connecting Orange County to LAX



Orange County Grand Jury 2025-2026

TABLE OF CONTENTS

SUMMARY	5
BACKGROUND	6
REASON FOR STUDY	14
METHOD OF STUDY	15
INVESTIGATION AND ANALYSIS.....	15
FINDINGS.....	26
RECOMMENDATIONS.....	27
COMMENDATIONS	29
REQUIRED RESPONSES	30
Glossary and Acronyms.....	33
Bibliography	34
Appendix A	40
Appendix B	42
Appendix C.....	44
Appendix D.....	45

TABLES

Table 1 Airport Transportation Options to/from Irvine and LAX.....	19
Table 2 Public Transportation Routes from Irvine* to LAX.....	20
Table 3 LAX Traffic Comparison for September 2025	40
Table 4 LAX Ground Transportation Monthly Report for September 2025	41
Table 5 Weekday FlyAway®-to-Metrolink/Amtrak Route with Average Travel Time of Two Hours and 15 Minutes and Average Wait Time of 38 Minutes.....	45
Table 6 Weekday FlyAway®-to-Metrolink/Amtrak Route with FlyAway® Bus Arriving Five Minutes Early Reduces Average Travel Time by 23 Minutes	46
Table 7 Weekend FlyAway®-to-Metrolink/Amtrak Route with Average Travel Time of Two Hours and 15 Minutes and Average Wait Time of 38 Minutes.....	47

Table 8	Weekend FlyAway®-to-Metrolink/Amtrak Route with FlyAway® Bus Arriving Five Minutes Early Reduces Average Travel Time by 21 Minutes	48
Table 9	Weekday LA Metro C Line-to-Metrolink/Amtrak Route with Average Travel Time of Two and a Half Hours and Average Wait Time of 54 Minutes	49
Table 10	Weekend LA Metro C Line-to-Metrolink/Amtrak Route with Last Departure from LAX at 3:40 PM and Average Travel Time in Excess of Three Hours	50
Table 11	Weekday Metrolink/Amtrak-to-FlyAway® Route with Average Travel Time of One Hour and a 48 Minutes and Average Wait Time of only Seven Minutes ..	51
Table 12	Weekend Metrolink/Amtrak-to-FlyAway® Route with Average Travel Time of One Hour and a 52 Minutes and Average Wait Time of only Ten Minutes ..	52
Table 13	Weekday Metrolink/Amtrak-to-LA Metro C Line Route with Average Travel Time of One Hour and 47 Minutes but only One Train during Mid-Day	53
Table 14	Weekend Metrolink/Amtrak-to-LA Metro C Line Route with Earliest Arrival to LAX at 11:45 AM and Average Travel Time of Two Hours and Eight Minutes.	53
Table 15	Comparison of Transit Routes from Irvine to LAX.....	54
Table 16	Comparison of Transit Routes from LAX to Irvine.....	54

FIGURES

Figure 1	LA Metro Rail and Busway Network	10
Figure 2	Metrolink Regional Rail System Map	11
Figure 3	LOSSAN Corridor Map.....	12
Figure 4	LAX Annual Passenger Traffic – Historical Data and Forecast.....	16
Figure 5	Automated People Mover Map from LAX Central Terminals to Rental Car Facility	17
Figure 6	LAX Vehicle Access Policy Post-Automated People Mover	18
Figure 7	Metrolink Systemwide Ridership	42
Figure 8	Peak/Off-Peak Ridership Analysis.....	43

SUMMARY

The Orange County Grand Jury (Grand Jury) conducted a study to assess current travel options between Orange County and Los Angeles International Airport (LAX). The study evaluated available services, travel times, costs, and service gaps through interviews, document reviews, field research, and evaluation of public complaints. The Grand Jury determined that although a reasonably affordable and reliable public transportation option to LAX already exists, significant opportunities remain to improve travel efficiency for Orange County residents. The Grand Jury identified five Orange County locations for potential direct-to-LAX transportation services that could reduce trip times to LAX by 30 minutes or more, reduce traffic congestion and vehicle emissions, and potentially reduce transportation costs to LAX.

A substantial share of Orange County travelers continues to rely on LAX despite the proximity of John Wayne Airport (SNA). While SNA serves roughly 11.8 million passengers annually, an estimated 9.9 million Orange County travelers choose LAX each year for generally lower fares, more international destinations, and greater availability of nonstop domestic routes. Orange County travelers use both SNA and LAX, but use of public transportation to both SNA and LAX is extremely low. Most passengers still depend on private vehicles and ride hailing services, which worsen roadway congestion and increase emissions.

The Grand Jury analyzed ten different transportation options, ranging from personal vehicles and ride-hailing services to combinations of Metrolink, Amtrak, LA Metro rail, and shuttle buses. Costs and travel times varied widely: the least expensive options, such as Metrolink combined with LA Metro light rail, generally involved the longest travel times, while premium private car services offered the fastest and most convenient—but highest cost—experience. Each option presented distinct advantages and disadvantages. Among the public transit options evaluated, the Metrolink or Amtrak connection to the FlyAway® bus proved the most reliable, with typical travel times under two hours.

Although federal regulations prohibit the Orange County Transportation Authority (OCTA) from operating a direct bus route to a single destination, OCTA plays a critical role in shaping regional transit. As the operator of transit centers and a member agency of Metrolink, OCTA has substantial influence over potential improvements to LAX - bound transportation for Orange County residents.

The FlyAway® bus service, operated by Los Angeles World Airports (LAWA), already provides direct, frequent, and efficient service from Union Station and Van Nuys to LAX.

Large-scale LAX improvement projects, including the Automated People Mover (APM), Intermodal Transportation Facilities, and roadway upgrades, are expected to further enhance airport access, ease congestion, and reduce emissions.

The Grand Jury identified five viable Orange County candidate sites for future FlyAway® or similar direct-to-LAX transportation services:

- Anaheim Regional Transportation Intermodal Center (ARTIC)
- Irvine Transportation Center
- Fullerton Park & Ride and Orangethorpe Transit Village Conceptual Study
- The Village at Buena Park Mall (transit-oriented development)
- Bolsa Pacific at Westminster (transit-oriented development at the former Westminster Mall)

Establishing service from these locations could reduce trip times to LAX by 30 minutes or more, reduce traffic congestion and vehicle emissions, and potentially reduce overall transportation costs to LAX.

BACKGROUND

Orange County Residents Use SNA and LAX

John Wayne Airport offers limited international service and fewer direct domestic routes compared to other major southern California airports. For many airline destinations, LAX remains the primary gateway to domestic and international travel for Orange County residents. Historically, travel from Orange County to Los Angeles for work or to reach LAX for travel has relied heavily on personal vehicles that cause traffic congestion and increase vehicle emissions, and public transportation options remain limited. Since 2014, traveler behavior and transportation patterns in Orange County have shifted as indicated by the following summary statistics:¹

- Orange County is the sixth most populous county in the United States with 3.175 million inhabitants, and its population has fluctuated by less than 44,000 people over the past 10 years.
- Households without cars increased from <2% in 2014 to 5% in 2023.
- Solo car commuters decreased from 79% to 69% from 2014 to 2023.
- John Wayne Airport reported that a survey found that 55% of travelers fly for pleasure/leisure, 31% for business, and 14% for personal/other reasons.

¹ Orange County Transportation Authority, *2024 OCTA Transit Vision: Appendix A – State of OC Transit*, May 2025, https://www.octa.net/pdf/OCTV_AppendixA.pdf.

- SNA welcomed eleven million annual passengers in 2024.
- SNA operates under a legal cap of 11.8 million annual passengers through 2025, set by a 1985 noise abatement settlement. The cap increases to 12.5 million from 2026 through 2030.²
- Orange County is origin/destination for 13% of LAX passengers or 9.9 million travelers in 2024.
- Anaheim (zip code 92802) is the top Orange County origin/destination for LAX passengers, many staying in hotels near Disneyland.
- LAX ground transportation statistics for September 2025 show only 0.2% of vehicle traffic to LAX were FlyAway® buses.

Each day, an average of 90,000 vehicles enter or exit LAX, including those used for passenger drop-offs and pickups, rental cars, taxis, rideshares, and airport staff transportation.³ LAX ground transportation statistics are available on the Los Angeles World Airports website. From January 2025 to September 2025, LAX has recorded passenger traffic totaling 55,451,401 passengers, which is an average daily visitation rate of 203,119 passengers.⁴ Monthly statistics for LAX air traffic and ground transportation in September 2025 are provided in Appendix A [Error! Reference source not found.](#)⁵

- Personal private vehicles and transportation network companies (TNCs) comprised approximately 85 percent of LAX's pickups and drop-offs. TNCs are businesses that provide on-demand ride services through digital platforms.
- Approximately one percent of LAX passengers use public transit.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) plays a key role in regional transportation planning. SCAG serves as the Metropolitan Planning Organization (MPO) for six counties, including Orange and Los Angeles. Its core planning document in transportation planning is the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides a 20-year multimodal vision updated every four years. SCAG's Aviation Program focuses on:

² Still Protecting Our Newport (SPON), *John Wayne Airport*, Accessed November 1, 2025, <https://spon-newportbeach.org/John-Wayne-Airport.html>.

³ Los Angeles World Airports, *Monthly Ground Transportation Traffic Statistics*, Accessed November 1, 2025, <https://www.lawa.org/lawa-investor-relations/statistics-for-lax/ground-transportation-traffic-statistics>.

⁴ Los Angeles World Airports, *Volume of Air Traffic*, Accessed November 1, 2025, <https://www.lawa.org/lawa-investor-relations/statistics-for-lax/volume-of-air-traffic>.

⁵ See Appendix A, Tables 3 and 4.

- Airport ground access planning
- Collaboration with LAX, the Federal Aviation Administration (FAA), and Caltrans Division of Aeronautics
- Data collection and forecasting for airport-related travel demand

SCAG works with key transit authorities and agencies like the OCTA, Los Angeles County Metropolitan Transportation Authority (LA Metro), and others across its six-county region to improve regional connectivity. SCAG's Corridor Planning Program identifies and enhances key transportation corridors, including those that could link Orange County transit centers to LAX. Projects from OCTA must be included in SCAG's RTP/SCS to qualify for state and federal funding. This includes potential FlyAway®-style services that would not be precluded from consideration pursuant to the federal charter prohibition, Metrolink enhancements, or express bus pilots. Many of SCAG's reports provide historical context, including SCAG President's Report (2025),⁶ SCAG Connect SoCal Final Report (2024),⁷ SCAG Aviation & Ground Access Technical Report (2024),⁸ SCAG Demographics & Growth Forecast Technical Report (2024),⁹ 2024 OC Transit Vision Full Report (2025)¹⁰ and Appendix A (2025).¹¹ SCAG has recently launched the SoCal Airport Access and Mobility Study,¹² a regional airport passenger and employee survey to better understand how people travel to and from southern California's airports. The study will analyze ground access patterns, preferences, and challenges for the purpose of informing planning for congestion relief, safety, and multimodal connectivity. The SoCal Airport Access and Mobility Study is scheduled to conclude by June 2027.

⁶ Southern California Association of Governments, *2024–25 President's Report*, May 2025, https://scag.ca.gov/sites/default/files/2025-05/24-0022-2025GA-PresidentsReport_Final.pdf.

⁷ Southern California Association of Governments, *Connect SoCal 2024: A Plan for Navigating to a Brighter Future*, Adopted April 4, 2024, <https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf>.

⁸ Southern California Association of Governments, *Connect SoCal 2024: Aviation & Airport Ground Access Technical Report*, Adopted April 4, 2024, <https://scag.ca.gov/sites/default/files/2024-05/23-2987-tr-aviation-airport-ground-access-final-040424.pdf>.

⁹ Southern California Association of Governments, *Connect SoCal 2024: Demographics & Growth Forecast Technical Report*, Adopted April 4, 2024, <https://scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf>.

¹⁰ Orange County Transportation Authority, *2024 OC Transit Vision*, May 2025, https://www.octa.net/pdf/OCTV_FullReport.pdf.

¹¹ Orange County Transportation Authority, *2024 OC Transit Vision: Appendix A – State of OC Transit*, May 2025, https://www.octa.net/pdf/OCTV_AppendixA.pdf.

¹² Southern California Association of Governments, *Aviation, SoCal Airport Access and Mobility Study*, Accessed November 20, 2025, <https://scag.ca.gov/aviation-program>.

Orange County Transportation Authority

OCTA, established by county referendum in 1972, evolved from Santa Ana Transit, and began with five bus routes. Over time, OCTA consolidated smaller transit agencies across the County.

As Orange County's transportation planning commission, OCTA funds and implements transit and capital projects to support a balanced, sustainable transportation system. It oversees services and programs that impact the daily lives of 3.2 million residents across thirty-four cities, as well as commuters and visitors.

OCTA manages bus and rail transit, rideshare programs, environmental initiatives, active transportation, express lanes, and freeway improvements. Its mission is to deliver transportation solutions that enhance quality of life and keep Orange County moving.¹³

OCTA works with SCAG to ensure that Orange County's transportation priorities align with the larger regional plan. OCTA focuses on operating transit services, managing highways, and oversight of Metrolink. OCTA prioritizes local transportation projects and submits them to SCAG for inclusion in the overall regional plan. Memorandums of Understanding (MOUs) exist between the two agencies to define their respective roles and responsibilities and ensure coordination.

LA Metro

The Los Angeles Metro Rail system began operations on July 14, 1990, with the opening of the Blue Line which connected downtown Los Angeles to Long Beach. Since that time, LA Metro has steadily expanded the network into a comprehensive rail system that includes six lines serving over one hundred stations across Los Angeles County. LA Metro planners and engineers have strategically extended service into key regions, including the San Fernando Valley, the Westside, and the South Bay, with the objective of alleviating traffic congestion and promoting a sustainable alternative to automobile travel. The system's network of light rail and busway routes, illustrated in Figure 1, reflects LA Metro's commitment to enhancing regional mobility.

¹³ Orange County Transportation Authority, *Connecting Orange County*, Accessed January 18, 2026, <https://www.octa.net/about/about-octa/overview>.



Source: metro.net

Figure 1 LA Metro Rail and Busway Network

Metrolink

Metrolink, launched in 1992, is the third-largest commuter rail network in the U.S., serving 67 stations across six counties. Operated by the Southern California Regional Rail Authority, a joint powers authority with leadership from Los Angeles, Orange, San Bernardino, Riverside and Ventura counties, Metrolink primarily connects regional commuters to downtown Los Angeles.¹⁴



Source: Metrolink

Figure 2 Metrolink Regional Rail System Map

Metrolink reported that recent ridership growth has been driven by off-peak travel, with over 140,000 boardings on the OC Line in April 2025 (see Appendix B). Since January 2025, off-peak ridership is increased 46% year-over-year, as shown in Appendix C. Metrolink is expanding its appeal to leisure travelers attending events, like a baseball game, or visiting attractions like Disneyland without the hassle of traffic and parking.¹⁵

¹⁴ Liz Ohanesian, "Day Trip on a Budget Throughout Southern California with Metrolink," *Orange County Register*, September 9, 2025. <https://www.ocregister.com/2025/09/09/day-trip-on-a-budget-throughout-southern-california-with-metrolink/>.

¹⁵ Liz Ohanesian, "Day Trip on a Budget," *Orange County Register*

Pacific Surfliner

Amtrak's Pacific Surfliner train runs along the 351-mile Los Angeles – San Diego – San Luis Obispo (LOSSAN) rail corridor, as shown in Figure 3. In Fiscal Year 2024-25 2.03 million passengers traveled the Pacific Surfliner. The LOSSAN Rail Corridor Agency, a joint powers authority composed of rail owners, operators, and planning agencies along the corridor, oversees service coordination and planning. Since July 2015, the agency has managed the Pacific Surfliner service under an interagency transfer agreement with the State of California. OCTA serves as the managing agency for the LOSSAN Agency.



Source: octa.net

Figure 3 LOSSAN Corridor Map

FlyAway® Bus

FlyAway® is an airport shuttle service providing non-stop connections to and from LAX and bus terminals near Van Nuys Airport and Los Angeles Union Station. Managed by LAWA and operated by Bus.com (9139249 Canada Inc.), a contracted bus provider, FlyAway® supports LAWA's initiative to reduce traffic congestion and emissions through high-occupancy transit. In 2024, LAWA reported over 1.9 million FlyAway® passengers with 1.1 million from Van Nuys and 0.8 million from Union Station.

Individuals traveling from Orange County to LAX must first either take Metrolink or Amtrak to Union Station, or drive there by car, where they transfer to a FlyAway® bus providing direct service to the airport. Unlike local transit services like OCTA, which operate fixed-route buses with multiple stops, FlyAway® buses provide nonstop service to LAX. LAWA operates FlyAway® under FAA guidelines, which restrict service to airport passengers and employees. Approximately 10% of FlyAway® riders are LAX workers. This restriction to airport passengers and employees ensures compliance with FAA regulations and maintains service efficiency.

FlyAway® routes cover twenty-two miles from Van Nuys and fourteen miles from Union Station to LAX. Despite the difference in distance, both routes offer similar travel times, typically 30 to 60 minutes, and maintain a bus frequency of every 30 minutes. The \$12.75 fare closely aligns with the breakeven point for operating costs, in contrast to OCTA's farebox recovery rate of between 10% and 20% of operating expenses.

Between 2009 and 2012, FlyAway® operated a direct route from the Irvine Transportation Center to LAX, covering approximately fifty miles. Service commenced on November 16, 2009, providing for a 60-minute or more journey between LAX and the Irvine Transportation Center. Despite its convenience, the service faced several challenges, including a limited schedule of just six trips per day, a relatively high fare of \$25, and low ridership. During Fiscal Years 2011–2012, the route averaged only forty-eight passengers per day and generated an annual operating loss of \$382,337, equating to roughly \$21.89 per passenger. These factors contributed to the route's discontinuation. Following the Chapter 11 bankruptcy filing of Coach America, the operator of the service, FlyAway® officially terminated the route on August 31, 2012.

Transit to John Wayne Airport and Other Airports

John Wayne Airport has approximately 32,000 visitors per day¹⁶ and 174 airport employees arriving each day.¹⁷ Most travelers at John Wayne Airport rely on personal vehicles and TNCs for their journeys. Those travelers heading to the Disneyland Resort area also use commercial shuttles and the Anaheim Transportation Network's (ATN) Everyone Ventures Everywhere (EVE) bus service to complete their trip. OCTA does not operate a direct transit link connecting John Wayne Airport to Metrolink. OC Bus 76, the only fixed-route service serving the airport, caters to airport staff and employees of nearby businesses. Between August 15 and September 15, 2025, OC Bus 76 averaged

¹⁶ John Wayne Airport, "John Wayne Airport Posts September 2025 Statistics," News Releases, Accessed November 1, 2025, <https://www.ocair.com/news/2025/10/22/statistics-september-2025/>.

¹⁷ John Wayne Airport, "Statistics," News & Info, Accessed November 1, 2025, <https://www.ocair.com/about/news-info/statistics/>.

just twenty daily riders, underscoring the difficulty of generating transit demand for airport-related trips.

The iShuttle 400A previously connected the Tustin Metrolink Station, John Wayne Airport, and the Irvine Business Complex (IBC). Operated jointly by the City of Irvine and OCTA, the shuttle aimed to reduce congestion and improve access to employment centers. It ran on weekdays during peak hours from October 13, 2019, until its cancellation on June 28, 2025, due to low ridership.

OCTA continues to assess its transit network through regular system studies, including OC Bus 360 (2016–2020), Making Better Connections (2022), and the OC Transit Vision (2024). An important focus of the 2024 OC Transit Vision is to identify potential high-capacity and rapid transit corridors. The OC Transit Vision report identified a potential long-term opportunity to explore an airport connection along the Bristol/State College corridor.

LAWA officials cited Boston and Minneapolis as having similar express bus and light rail services from metropolitan areas to major international airport terminals. These metropolitan areas are somewhat comparable to the multi-county metropolitan region served by LAX. In Boston, the Logan Express bus service operates from five locations in the Boston area to Logan International Airport with daily ridership of 6,850 passengers, system wide. Covering 23-miles, the Framingham, MA to Boston Logan route costs \$9 per trip, operates every 30 minutes, and completes the journey in 35 to 45 minutes. The Minneapolis Metro Blue Line, a light rail service, connects Minneapolis International Airport to downtown Minneapolis and other locations like the Mall of America. The route is nine miles from the airport to downtown. The Blue Line light rail operates every 12 minutes from Minneapolis International Airport with a fare of \$2 to downtown. In 2025 Blue Line daily ridership averaged 15,300 passengers.

REASON FOR STUDY

The overall purpose of this study was to evaluate current and future in-progress travel options between Orange County and LAX. John Wayne Airport accommodates approximately 11.8 million passengers annually, while an estimated 9.9 million Orange County residents travel through LAX. The grand jury report will serve several purposes including informing Orange County residents of available service options and associated time requirements as well as costs of the distinct options. In addition, the report will highlight service gaps and inefficiencies. Route and/or schedule enhancements or expansion opportunities will also be addressed. Finally, by promoting the use of public transportation, reduction of traffic congestion and vehicle emissions

will be realized. The goal of this report will be to identify specific public transportation options and identify and prioritize implementation of those options by evaluation of time requirements, costs, and schedule options.

METHOD OF STUDY

The Orange County Grand Jury investigated the transportation challenges that Orange County residents face when traveling to LAX to provide a clear and accurate assessment. The Grand Jury based its study on a comprehensive review of multiple sources, including interviews, public records, complaint letters submitted to the Grand Jury, and relevant news articles. Multiple independent sources corroborated and validated all facts, findings, and recommendations presented in the report.

- Interviewed several Orange County executives and senior staff directly involved in managing transportation systems connecting Orange County to LAX.
- Reviewed and analyzed key documents related to the investigation, including:
 - Metrolink operational overviews
 - Records from OCTA, Metrolink, LA World Airports, LA Metro, and the Norwalk Transportation System
- Examined news articles and publications relevant to the topic.
- Investigated the transportation concerns outlined in public complaint letters submitted to the Grand Jury.
- Conducted extensive internet research.
- Performed field investigations in which Grand Jury members rode Metrolink, Norwalk Transportation System Bus 4, and four LA Metro lines, and engaged with security personnel and staff at FlyAway® Bus, Union Station, Norwalk, and LAX Metro stations to directly observe and assess transportation conditions.

INVESTIGATION AND ANALYSIS

LAX Passenger Growth and Forecast

In 2024, LAX welcomed over 76.58 million travelers.¹⁸ Although LAX dropped to the 5th busiest airport in the United States, partly due to ongoing construction and relatively high landing fees,¹⁹ LAWA consultants conservatively project a compound annual

¹⁸ Los Angeles World Airports, *10-Year Summary*, Accessed November 1, 2025, <https://www.lawa.org/lawa-investor-relations/statistics-for-lax/10-year-summary/passengers>.

¹⁹ Howard Fine, "LAX Slips to 5th Busiest in the Nation," *Los Angeles Business Journal*, February 10, 2025, <https://labusinessjournal.com/featured/lax-slips-to-5th-busiest-in-the-nation/>.

growth rate (CAGR) of 2.7% in passenger traffic through Fiscal Year 2034.²⁰ At this pace, LAX could serve over 100 million travelers annually by 2034, representing a 30% increase from current levels and an additional 23.4 million travelers per year.

Figure 4 illustrates historical data for LAX passenger traffic between 2015 and 2024 and forecast estimates beyond 2024.

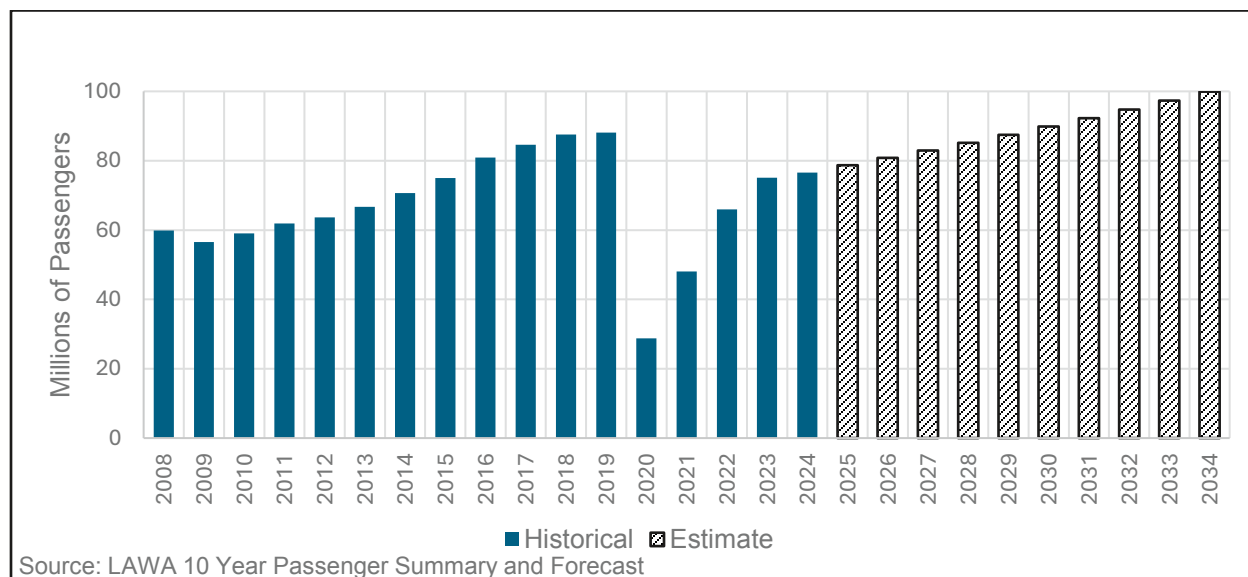


Figure 4 LAX Annual Passenger Traffic – Historical Data and Forecast

LAX Capital Improvement Projects

To accommodate this growth, LAWA has completed or is nearing completion of several capital improvement projects as part of its Landside Access Modernization Program (LAMP) and Airfield & Terminal Modernization Project (ATMP).

- Automated People Mover (APM):** A 2.25-mile elevated train connecting terminals, parking areas, the Consolidated Rent-A-Car (ConRAC) facility, and LAX/Metro Transit Center. It is expected to transport up to eighty-five million passengers annually.²¹ APM is aimed at (1) reducing vehicle congestion near LAX, (2) providing efficient ground transportation, and (3) improving airport accessibility.

²⁰ Los Angeles World Airports, "LAX Capital Program Plan of Finance and Key Metrics," *LAWA Legislative Update*, March 13, 2025, <https://www.lawa.org/sites/lawa/files/2025-03/3.%20Management%20Report%20C%20-%20Capital%20Finance%20Plan.pdf>.

²¹ M. Kubwa, "\$2 Billion LAX's People Mover Completion Set for Late 2025," *Construction Review*, April 5, 2024, <https://constructionreviewonline.com/construction-news/usa/2-billion-laxs-people-mover-completion-set-for-late-2025/>.

- **ConRAC Facility:** A 6.3-million-square-foot facility housing over 18,000 rental vehicles. Its integration with APM will eliminate over 3,200 daily rental car shuttle trips from the LAX Central Terminal Area (CTA).²²
- **Intermodal Transportation Facilities (ITF):** Two facilities (ITF East and ITF West) offering parking, ground transportation services, and meet-and-greet areas.
- **ATMP Roadway Improvements Project:** Reconfigured roadways, including 4.4 miles of new infrastructure, are being constructed to reduce congestion on Sepulveda Boulevard and create dedicated airport access routes. Construction near Sepulveda Boulevard, 96th Street, and Century Avenue will continue through 2030.

Completion of LAMP and ATMP projects will significantly alleviate traffic congestion and reduce long lines that plague LAX's current CTA. An aerial view in Figure 5 illustrates the scale of the APM.

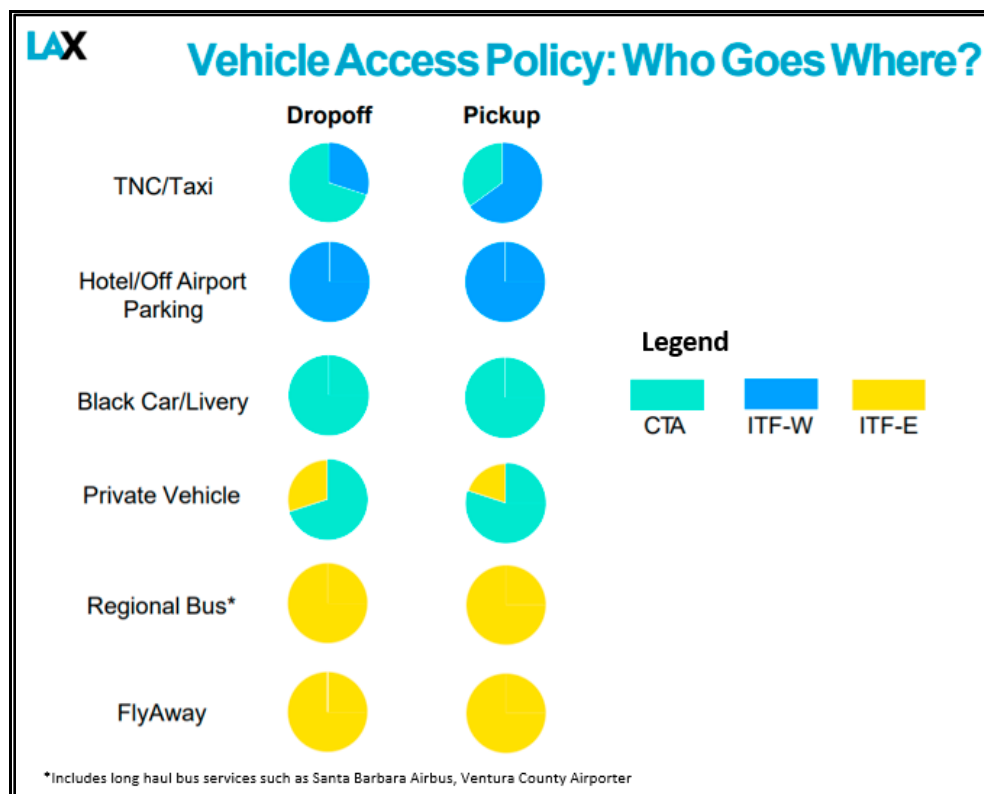


Source: Gateway Los Angeles Airport Business District Official Website

Figure 5 Automated People Mover Map from LAX Central Terminals to Rental Car Facility

²² Los Angeles World Airports, "Consolidated Rent-A-Car Facility," *Connecting LAX*, Accessed November 1, 2025, <https://www.lawa.org/connectinglax/consolidated-rent-a-car-facility>.

Figure 6 details vehicle access policy and categories of how shuttle and commercial bus pick-ups and drop-offs will occur at the Intermodal Transportation Facilities.



Source: LAWA Board of Airport Commissioners Management Report, August 3, 2023

Figure 6 LAX Vehicle Access Policy Post-Automated People Mover

LAWA officials consider the Union Station and Van Nuys routes ideal for FlyAway® service. Union Station offers convenient access to parking and multiple transit modes, enhancing connectivity for airport-bound travelers. With ongoing improvements under LAMP and ATMP, LAWA anticipates expanding service while reducing operational costs.

Transportation Options Between Orange County and LAX

The Grand Jury identified multiple transportation options between Orange County and LAX. Table 1 summarizes these options, including cost, travel time, and number of transfers. Estimated costs and travel time in Table 1 are based on a weekday one-way trip from Irvine, CA to LAX at 10:00 AM. Personal vehicle cost assumes a 50-mile distance between Irvine, CA and LAX, twenty-five miles per gallon, and \$4.50 per gallon.

Table 1 Airport Transportation Options to/from Irvine and LAX

Option	Cost Estimate	Travel Time	Transfers	Pros	Cons
Get Dropped Off	\$18	1:00	0	Simple, low cost, no parking hassle	Requires family/friend's time and availability
Drive Yourself	\$9 + \$30/day for economy parking	1:00	0	Full control over timing; easy access to car; predictable cost with reservation	Parking fees can be high; risk of car damage; traffic stress
Drive Yourself → LA Metro C Line (Norwalk Station) → APM	\$7.15 + \$3/day for parking	1:15	2	Full control over timing; predictable cost; low parking fees at Norwalk Station	Risk of car damage; traffic stress; addition planning for long-term parking
Transport Network Companies (Uber, Lyft, Opoli) → APM	\$80–\$150	1:00	0-1	Door-to-door convenience; no parking needed; customizable vehicle options	Surge pricing; availability varies; unpredictable costs
Metrolink → FlyAway® → APM	\$23.75	1:44	2	Affordable; Amtrak ticket adds \$8;	Longer travel time; limited schedule; variable fees for long-term parking
Metrolink → LA Metro → APM	\$12.75	1:43	3–4	Cheapest option; Amtrak ticket adds \$8; eco-friendly	Multiple transfers; long travel time; limited-service hours; variable fees for long-term parking
One-Way Car Rental → APM	\$60	1:00	1	Flexible for visitors; option for SNA flights redirected to LAX; no return trip needed	Cost includes gas, rental, and drop-off fees; logistics of pickup/drop-off
Taxi → APM	\$95–\$200	1:00	1	Reliable; direct service	Expensive; metered fare can vary with traffic
Black Car/Executive Car	\$160–\$330	1:00	0	Luxury experience; flight tracking; stress-free	Expensive
Shuttle Bus → APM	\$80-150	1:10	1	Cost-effective for groups; door-to-door; flight tracking	Longer travel time due to multiple stops; less privacy

Note: During peak commute times, travel time estimates for car and bus options could be an additional 30 minutes or more.

Public Transportation Options

Highlights of selected public transportation options from Orange County to LAX available after the opening of the APM are given in Table 2 with routes departing from the Irvine Metrolink Station to LAX and other public transit modes as noted. Currently, FlyAway® buses drop passengers off directly at the LAX Central Terminal Area (CTA), while LA Metro riders arriving at ITF East transfer to a LAX Shuttle bus to reach the CTA.

Table 2 Public Transportation Routes from Irvine* to LAX

Route	Travel Time	Transfers	Transfer Locations
Metrolink/Amtrak → FlyAway® Bus → APM	~1.9 hours	2	1. Union Station 2. ITF East
Metrolink → Norwalk Transit → Metro C Line → APM	~1.9 hours	3	1. Norwalk/Santa Fe Springs Station 2. Norwalk Station 3. ITF East
Metrolink/Amtrak → Metro Bus J Line → Metro C Line → APM	~2.2 hours	3	1. Union Station 2. Harbor Freeway Station 3. ITF East
Metrolink/Amtrak → Metro A → E → K Lines → APM	~2.1 hours	4	1. Union Station 2. Little Tokyo Station 3. Expo/Crenshaw Station 4. ITF East
OC Bus 83 → Metro Bus 460 → Metro C Line → APM	~3.2 hours From Laguna Hills Transportation Center	3	1. Disneyland East Shuttle Station 2. Norwalk Station 3. ITF East
OC Bus 70 → OC Bus 543 or 43 → Metro Bus 460 → Metro C Line → APM	~3.3 hours From Tustin Metrolink Station	4	1. Edinger Avenue & Harbor Blvd. 2. Disneyland East Shuttle Station 3. Norwalk Station 4. ITF East
OC Bus 529 → Metro Bus 460 → Metro C Line → APM	~2.4 hours From Goldenwest Transportation Center	3	1. Fullerton Park & Ride 2. Norwalk Station 3. ITF East

*Note: Starting locations other than Irvine Metrolink Station are identified.

Safety

The Grand Jury received letters from the public expressing concern about safety on public transportation. While LA Metro carries nearly one million passengers daily, the Los Angeles County Sheriff's Department, Transit Services Bureau recorded 537 crimes for the year on LA Metro buses and trains as of October 9, 2025, with battery, theft, aggravated assault, and robbery among the most frequent offenses.²³ In 2024, OCTA reported bus ridership at 34.8 million boardings and 314 Group A offenses, which are serious crimes such as assault, theft, and drug violations, reflecting a 15% decrease from 2023.

LA Metro continues to enhance its customer experience, with a February 2025 rider survey indicating that 87% of passengers are satisfied or very satisfied with the service. In the same survey, 53% of respondents reported noticeable improvements in the transit

²³ Los Angeles County Sheriff's Department, *Transit Services Bureau Weekly Report*, October 14, 2025, <https://lasd.org/transit-services-bureau-weekly-report-68/>.

system over the past year, primarily citing better service quality and increased safety.²⁴ Meanwhile, customer feedback consistently rates Metrolink, Amtrak, and FlyAway® services as reliable and safe.

LA Metro responded to safety concerns by implementing a layered security strategy that includes uniformed law enforcement officers, Metro Transit Security Officers, and Metro Ambassadors throughout the system. The agency upgraded station infrastructure with brighter lighting, expanded surveillance coverage, and taller fare gates to deter fare evasion and unauthorized access. LA Metro partners with county, city, and regional agencies to implement a care-based approach that delivers support and resources to individuals experiencing homelessness and those with untreated mental illness. After crime increased following the suspension of the Tap-to-Exit program, LA Metro reinstated the initiative and expanded weapons detection technology at key stations.²⁵ These measures reflect LA Metro's commitment to maintaining a secure and accessible transit environment.

Travelers who use the LA Metro C Line to reach LAX benefit from recent infrastructure upgrades and a continuous security presence at the LAX/Metro Transit Center. This facility connects the C and K Lines to the airport via a free shuttle service and, beginning in mid-2026, will offer direct access through the APM. Enhanced lighting, surveillance systems, and Americans with Disabilities Act (ADA) accessible facilities contribute to a safer experience for airport-bound passengers, especially during daytime and peak travel hours (6:00 AM–9:00 AM and 3:00 PM–7:00 PM).

Cost Analysis

Public transportation total fares from Orange County to LAX range from \$9.50 to \$35.75 depending on origin and route. Fare programs offer discounts for students, seniors, and disabled persons. For example, Metrolink Monthly Pass holders can ride the FlyAway® bus at no additional cost. Published regular fares that are shown below are from official websites as of September 12, 2025.

- **FlyAway®:** \$12.75 (Union Station to LAX)
- **Metrolink:** \$7.75–\$13.50 (between Buena Park and San Clemente to Union Station)

²⁴ LA Metro, *LAX Metro Transit Center Opening Drives Dramatic Increase in Ridership on K Line*, Accessed November 2, 2025, <https://www.metro.net/about/lax-metro-transit-center-opening-drives-dramatic-increase-in-ridership-on-k-line/#:~:text=Overall%20System%20Ridership%20and%20Experience,reasons%20cited%20for%20the%20improvement.>

²⁵ Travis Schlepp, "What Happened After LA Metro Paused Its Tap-to-Exit Program," *KTLA*, September 15, 2025, <https://ktla.com/news/travel/what-happened-after-la-metro-paused-its-tap-to-exit-program/>.

- **Amtrak:** \$14–\$23 (between Buena Park and San Clemente to Union Station)
- **OC Bus:** \$2 per boarding or \$5/day
- **LA Metro:** \$1.75 per trip with free transfers for two hours, \$5 fare cap/day
- **Norwalk Transit:** \$1.25 per boarding (Norwalk Metrolink to Norwalk C Line Station)

Parking fees vary at Metrolink/Amtrak stations across Orange County. Most stations provide free daily parking for up to 72 hours. Some stations located in high-demand urban areas require paid parking permits. At ARTIC, vehicles must be registered for overnight or Lot C parking at least 24 hours prior to parking. An overnight parking authorization form can be found on the Visit Anaheim website. Current parking guidelines and fees can be found on the Metrolink “Parking at Stations” website. FlyAway® bus patrons can use parking lots at Union Station and Vay Nuys, which have daily parking fees of \$8/day and \$6/day with a 30-day limit, respectively. Parking is \$3/day and permitted overnight for seventy-two consecutive hours at the LA Metro C Line Norwalk Station. For longer stays, an Extended Permit Authorization Form must be submitted in advance to metroparking@joesautoparks.com. Parking at the Norwalk Station parking lot is free on weekends and holidays.

LA Metro commuters use a pre-paid TAP fare card for transportation fares and OC Bus commuters began using a pre-paid WAVE card in October 2025.

Schedule and Reliability

The Grand Jury examined published schedules (Appendix C) and route maps. Transit app, Apple Maps, and Google Maps confirmed real-time routes and travel times.

- **FlyAway®:** Runs every 30 minutes; 30-to-60-minute travel time varies day-to-day
- **LA Metro Rail:** Lines A, C, E, and K typically run every ~10 minutes; travel time depends on route
- **APM:** Runs every two minutes at peak usage; ~10-minute end-to-end travel time²⁶
- **Metrolink/Amtrak:** Hourly weekday coverage; limited weekend Metrolink service
- **Norwalk Transit Buses 4 & 7:** ~30-minute weekday frequency; ~50-minute weekend frequency; Travel time is between 15 and 25 minutes, depending upon day, time of day, and direction of route

²⁶ Los Angeles World Airports, “Automated People Mover (APM) Train System,” *The Development Group*, Accessed November 1, 2025, <https://www.lawa.org/transforminglax/projects/automated-people-mover-train-system>.

Based on published schedules, the Grand Jury found that the FlyAway® bus service from Union Station to LAX typically takes approximately 34 minutes under normal traffic conditions and is 10 to 20 minutes faster than LA Metro's light rail alternatives. However, during peak commuting times—such as 8:00 AM and 5:30 PM—the FlyAway® bus can take 60 minutes or more. Starting in early 2026, FlyAway® passengers will transfer at ITF East and use the Automated People Mover, rather than being dropped off or picked up at LAX's Central Terminal Area. According to LAWA officials, this change will improve the customer experience, improve bus queues, and reduce trip times.

FlyAway® buses operate every 30 minutes, while LA Metro light rail trains on the A, C, E, and K Lines typically run every 10 minutes. If a passenger misses a FlyAway® bus and opts for LA Metro instead, they may arrive at LAX's Central Terminal Area at the same time or up to 10 minutes earlier than the next FlyAway® bus.

The Grand Jury found that the Metrolink and Amtrak Pacific Surfliner schedules separately have gaps at the time of this report. However, together they provided hourly weekday service to and from Union Station. On weekdays, train service from Irvine, CA runs from 5:12 AM to 10:49 PM, with thirteen northbound Metrolink trips and twelve northbound Amtrak trips. A similar number of southbound trips depart Union Station daily. Amtrak Pacific Surfliner maintains the same schedule on weekends, while Metrolink reduces service to four northbound and four southbound trips each day. Starting in early 2026, Amtrak will increase Pacific Surfliner service to thirteen daily trips.

Norwalk Transit System (NTS) Buses 4 and 7 connect the Metrolink Norwalk/Santa Fe Springs Station to the LA Metro C Line Norwalk Station, located 3.1 miles apart. Although weekend service is less frequent, both weekday and weekend schedules for Buses 4 and 7 align with the first and last Metrolink trains at Norwalk/Santa Fe Springs Station.

The Grand Jury learned that travelers can connect from the LA Metro C Line at its Norwalk Station to LA Metro Bus 460 to reach Disneyland. A trip from LAX to Disneyland takes approximately two hours. Passengers may transfer from Bus 460 to Orange County buses at Knott's Berry Farm, Fullerton Park & Ride, or Disneyland. This route offers a lower-cost alternative to Metrolink/Amtrak, though it requires more travel time.

The investigation identified the fastest public transit route from Irvine to LAX as the Metrolink or Amtrak connection to the FlyAway® bus at Union Station (see Appendix D). This route averages one hour and 48 minutes on weekdays, with the quickest connection taking one hour and 41 minutes in the afternoon. The return trip from LAX to

Irvine averages two hours and 15 minutes. Travel times for the FlyAway® bus can vary due to traffic congestion. The Grand Jury found that if FlyAway® buses arrived five minutes earlier at Union Station, travelers could catch the next Metrolink or Amtrak train departing at 10 and 40 minutes past the hour, reducing average travel time by 23 minutes.

An alternate route to LAX via Metrolink requires a transfer at the Norwalk/Santa Fe Springs Station to NTS Bus 4 or 7, followed by a connection to the Metro C Line. On weekdays, this trip averages approximately one hour and 47 minutes. On weekends, travel time exceeds two hours and eight minutes due to limited Metrolink service and the absence of Amtrak stops at the Norwalk/Santa Fe Springs Station. The return trip from LAX to Irvine via this route averages 2 hours and 30 minutes on weekdays and over 3 hours on weekends, primarily due to extended wait times for Metrolink trains. Weekend travelers face additional constraints, with the earliest possible arrival at LAX after 11:45 AM and final departure from LAX using this route at 3:40 PM.

Transit-Supportive Developments

There are transit-supportive and transit-oriented developments in Orange County that are approximately 25-miles from LAX and near a freeway include Fullerton Park and Ride, Buena Park Mall, and former Westminster Mall.

The Fullerton Park & Ride facility is the focus of a major planning initiative called the Orangethorpe Transit Village Conceptual Study, led by the Orange County Transportation Authority (OCTA) in partnership with the City of Fullerton. The study is exploring the potential for transit-supportive mixed-use development at the 9-acre Fullerton Park & Ride site, which is currently underutilized.

The Buena Park Downtown Mall is undergoing a major transit-oriented design transformation centered around the redevelopment of the former Sears property. Approved by the Buena Park City Council in June 2023, the Village at Buena Park is a \$650 million mixed-use project led by Merlone Geier Partners. It will replace the old Sears building and adjacent parking lot with 1,302 apartments and townhomes, public space with walking paths, electric vehicle (EV) charging stations, bike racks, and 3,000 parking spaces.

The City of Westminster has approved the Westminster Mall Specific Plan (WMSP), which outlines a plan for converting the mall into a mixed-use development with 1,167 housing units, retail, hospitality, and public spaces with walking paths. Shopoff Realty Investments is leading this 26-acre redevelopment project, called Bolsa Pacific at Westminster. The project's design and goals reflect principles of Transit-Oriented

Development (TOD), such as walkable streets, mixed-use buildings, higher residential density, and proximity to public transit. As for transit services, OC Bus 64 currently stops at bus only lane near the former Westminster Mall on Edwards Street near Bolsa Avenue.

ARTIC is co-located at the OC Vibe development, which has elements of transit-oriented design. While ARTIC is forty miles from LAX, ARTIC provides connectivity to Anaheim Resort Transportation (ART), Metrolink, Amtrak, OCTA buses, and Greyhound buses.

Barriers to Airport Transit Success

The Grand Jury identified several key barriers that hinder the success of airport transit services:

- **Time-sensitivity:** Air travelers are highly time-conscious. The risk of missing a flight makes reliability paramount, and many passengers prefer to maintain control over their schedule, often distrusting public transit reliability.
- **Convenience:** Public buses are frequently perceived as slow, infrequent, and indirect compared to driving or using transportation network companies (TNCs). Transfers and wait times at bus stops add stress and reduce appeal.
- **Luggage Limitations:** Transit vehicles are typically not designed to accommodate large or heavy luggage, making them less suitable for airport-bound passengers.
- **Travel Habits:** Historically, airport trips have been dominated by private vehicles and shuttle services. Public transit has not been the preferred mode for most travelers.

The Grand Jury concluded that the Metrolink or Amtrak connection to the FlyAway® bus from Union Station currently offers the most reliable public transit option between Orange County and LAX, with average travel times under two hours. Return trips from LAX to Irvine average two hours and 15 minutes. The Grand Jury found that adjusting FlyAway® bus arrival times at Union Station by five minutes would enable passengers to board earlier Metrolink or Amtrak trains, thereby reducing travel time from LAX to Orange County by 23 minutes. LAWA has an opportunity to revise FlyAway® bus departure schedules with the opening of ITF East in mid-2026.

Using LA Metro light rail instead of the FlyAway® bus adds 10 to 20 minutes to the journey from Union Station to LAX. Although the Norwalk/Santa Fe Springs shortcut may offer faster travel to LAX at certain times, limited Metrolink service results in return trips that are over 30 minutes longer than the FlyAway® route via Union Station.

Implementing direct FlyAway®-style bus service between LAX and Orange County would ease traffic congestion, lower greenhouse gas emissions, and significantly improve regional transit efficiency, cutting public transit travel times by 30 minutes or more. The Grand Jury identified several viable locations within Orange County for such a service. A comparative analysis of travel durations (see Table 1) underscores the time-saving potential of enhanced regional transit connectivity. LAWA's proven success with the FlyAway® program demonstrates that direct bus service can operate near the breakeven point, offering a practical and efficient solution for airport access.

Better Understanding Orange County's Needs

The Southern California Association of Governments (SCAG) has launched its SoCal Airport Access and Mobility Study, a regional airport passenger and employee survey to better understand how people travel to and from Southern California's airports.²⁷ The first stage of the study is analysis of existing conditions to document the region's airports, access facilities, and connecting transportation networks. This is the ideal opportunity for SCAG to engage with all Orange County cities to understand each city's transportation need for enhanced regional intermodal transit connectivity across various transit authorities and agencies and across county lines.

FINDINGS

In accordance with California Penal Code Sections 933 and 933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency affected by the findings presented in this section. The responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury has arrived at the following six principal findings:

- F1** Several Orange County locations meet the criteria for express bus pick-up sites, being approximately twenty-five miles from LAX and near major freeways. These locations are Fullerton Park & Ride, Buena Park Mall, and former Westminster Mall.
- F2** The Anaheim Regional Transportation Intermodal Center presents a viable option for express bus service to LAX due to its location near Orange

²⁷ Southern California Association of Governments. *SoCal Airport Access and Mobility Study*.
<https://scag.ca.gov/aviation-program>

County attractions and multimodal connectivity, despite being forty miles from LAX.

- F3** The Irvine Transportation Center is a viable potential location for direct bus service to LAX due to its location near South Orange County, freeway access, and multimodal connectivity, despite being fifty miles from LAX.
- F4** Public transit options to LAX that offer travel times comparable to private automobiles have several limitations.
- The Orange County Transportation Authority has never operated direct transit service to LAX due to federal regulations prohibiting transit bus service to a single destination such as LAX.
 - Metrolink OC Line lacks direct connections to LAX, as stations such as Norwalk/Santa Fe Springs do not provide a seamless link to the airport.
 - Southern California Association of Governments planning documents that discuss regional airport ground access neglect cross-county mobility challenges.
- F5** Metrolink provides less frequent service on weekends. Weekend travel times often exceed three hours due to reduced train schedules and longer transfer wait times.
- F6** Metrolink offers the most dependable connection at Union Station, linking travelers to bus and light rail services to LAX. These routes require transfers, and variable freeway conditions can affect overall travel times.

RECOMMENDATIONS

In accordance with California Penal Code Sections 933 and 933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency affected by the recommendations presented in this section. The responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury makes the following eight recommendations:

- R1** By September 30, 2026, the City of Fullerton should direct its Planning Department to collaborate with Orange County Transportation Authority (OCTA) and Los Angeles World Airports (LAWA) on a business case study for FlyAway® or similar services from Fullerton Park & Ride

(Orangethorpe Transit Village) to LAX, with a case study submitted to LAWA. This study should include projected ridership, financial sustainability, infrastructure readiness, and community benefits to support funding of the proposed service. [F1]

R2 By September 30, 2026, the Buena Park City Council should direct its Planning Department to collaborate with Los Angeles World Airports (LAWA) on a business case study for FlyAway® or similar services from the Buena Park Mall site (Village at Buena Park) to LAX, with a case study submitted to LAWA. This study should include projected ridership, financial sustainability, infrastructure readiness, and community benefits to support funding of the proposed service. [F1]

R3 By September 30, 2026, the Westminster City Council should direct its Planning Department to collaborate with Los Angeles World Airports (LAWA) on a business case study for FlyAway® or similar services from the former Westminster Mall site (Bolsa Pacific at Westminster) to LAX, with a case study submitted to LAWA. This study should include projected ridership, financial sustainability, infrastructure readiness, and community benefits to support funding of the proposed service. [F1]

R4 By September 30, 2026, the Anaheim City Council should direct its Planning Department to collaborate with Orange County Transportation Authority (OCTA) and Los Angeles World Airports (LAWA) on a business case study for FlyAway® or similar services from the Anaheim Regional Transit Intermodal Center to LAX, with a case study submitted to LAWA. This study should include projected ridership, financial sustainability, infrastructure readiness, and community benefits to support funding of the proposed service. [F2]

R5 By September 30, 2026, the Irvine City Council should direct its Transportation Department to review the previous FlyAway® service that ended in 2012, engage the LAWA Mobility Unit or any other express bus service of their choice, and, upon receiving City Council approval, submit a business case study to LAWA or other express bus service(s). This study should include projected ridership, financial sustainability, infrastructure readiness, and community benefits to support funding of the proposed service. [F3]

R6 By September 30, 2026, Southern California Association of Governments should reach out to all Orange County cities to engage and understand

each city's transportation need for enhancing regional intermodal transit connectivity across various transit authorities and agencies and across county lines. [F4]

R7 By March 31, 2026, Metrolink should increase Metrolink OC Line weekend train service to support public transportation trips from Orange County through Union Station to LAX. [F5]

R8 By June 30, 2026, OCTA and Metrolink should promote the appropriate services that offer convenient connections to LAX, aiming to inform and guide travelers who are ready to choose public transit for their airport commute. [F6]

COMMENDATIONS

Southern California cities have made commendable strides in addressing transportation challenges through innovative, community-responsive programs which exemplify proactive governance and sustainable urban planning.

One standout initiative is *Irvine CONNECT*, a free neighborhood shuttle service launched by the City of Irvine in response to resident concerns about traffic congestion and limited transit options. This program reflects a thoughtful and inclusive approach to mobility, connecting key destinations such as parks, schools, hospitals, and shopping centers with Irvine Station. Since its inception, Irvine CONNECT has expanded significantly—most notably in July 2025, when the city extended the Yale-Barranca route and introduced new routes like the Jamboree-UCI and Barranca Link. These expansions were based on data from the city's Transit Vision Study and community feedback, demonstrating Irvine's commitment to evidence-based planning and public engagement.

The program's success is evident in its ridership growth, with the original route serving nearly 150,000 rides in its first year. The city's decision to sunset the older iShuttle program and consolidate services under Irvine CONNECT further highlights its dedication to streamlining operations and improving service quality. With seventy-seven stops and shuttles running every 20 minutes, Irvine CONNECT offers an eco-friendly, accessible alternative to car travel, helping reduce emissions and traffic while enhancing connectivity across the city.

These efforts deserve recognition not only for their operational success but also for their responsiveness to community needs. Mayor Larry Agran praised the effort saying, "The No.1 complaint I hear from our city residents is about Irvine's traffic congestion. The

Irvine CONNECT shuttle is one way we are addressing that issue.”²⁸ Irvine’s leadership in expanding transit infrastructure, investing in capital improvements like new bus stops, and leveraging technology for real-time shuttle tracking sets a high standard for municipal transit innovation. Programs like Irvine CONNECT are a model for other cities seeking to build sustainable, resident-centered transportation networks. Orange County has launched several other commendable transportation programs that prioritize safety, sustainability, and regional connectivity. These initiatives reflect strong leadership and a commitment to improving mobility for residents and visitors alike.

REQUIRED RESPONSES

California Penal Code Section 933 requires the governing body of any public agency which the Grand Jury has reviewed, and about which it has issued a final report, to comment to the Presiding Judge of the Superior Court on the findings and recommendations pertaining to matters under the control of the governing body. Such comment shall be made no later than 90 days after the Grand Jury publishes its report (filed with the Clerk of the Court). Additionally, in the case of a report containing findings and recommendations pertaining to a department or agency headed by an elected County official (e.g., District Attorney, Sheriff, etc.), such elected County official shall comment on the findings and recommendations pertaining to the matters under that elected official’s control within 60 days to the Presiding Judge with an information copy sent to the Board of Supervisors.

The following excerpts from the California Penal Code provide the requirements for public agencies to respond to the Findings and Recommendations of this Grand Jury report:

§933

(c) No later than 90 days after the grand jury submits a final report on the operations of any public agency subject to its reviewing authority, the governing body of the public agency shall comment to the presiding judge of the superior court on the findings and recommendations pertaining to matters under the control of the governing body, and every elected county officer or agency head for which the grand jury has responsibility pursuant to Section 914.1 shall comment within 60 days to the presiding judge of the superior court, with an information copy sent to the board of supervisors, on the findings and recommendations pertaining to matters under the control of that county officer or agency head and any agency or agencies which that officer or agency head supervises

²⁸ Irvine Community News & Views iMessage, (*Free Irvine CONNECT Shuttle Bus Has Expanded Routes*, 10/2/2025).

or controls. In any city and county, the mayor shall also comment on the findings and recommendations. All of these comments and reports shall forthwith be submitted to the presiding judge of the superior court who impaneled the grand jury. A copy of all responses to grand jury reports shall be placed on file with the clerk of the public agency and the office of the county clerk, or the mayor when applicable, and shall remain on file in those offices. One copy shall be placed on file with the applicable grand jury final report by, and in the control of the currently impaneled grand jury, where it shall be maintained for a minimum of five years.

§933.05.

(a) For purposes of subdivision (b) of Section 933, as to each grand jury finding, the responding person or entity shall indicate one of the following:

(1) The respondent agrees with the finding.

(2) The respondent disagrees wholly or partially with the finding, in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons therefor.

(b) For purposes of subdivision (b) of Section 933, as to each grand jury recommendation, the responding person or entity shall report one of the following actions:

(1) The recommendation has been implemented, with a summary regarding the implemented action.

(2) The recommendation has not yet been implemented, but will be implemented in the future, with a timeframe for implementation.

(3) The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a timeframe for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of the public agency when applicable. This timeframe shall not exceed six months from the date of publication of the grand jury report.

(4) The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation therefor.

(c) However, if a finding or recommendation of the grand jury addresses budgetary or personnel matters of a county agency or department headed by an elected officer, both the agency or department head and the board of supervisors shall respond if requested by the grand jury, but the response of the board of supervisors shall address only those

budgetary or personnel matters over which it has some decision-making authority. The response of the elected agency or department head shall address all aspects of the findings or recommendations affecting his or her agency or department.

The Orange County Grand Jury requires the following responses:

City of Fullerton	90 Day Response Required
Findings:	F1
Recommendations:	R1
City of Buena Park	90 Day Response Required
Findings:	F1
Recommendations:	R2
City of Westminster	90 Day Response Required
Findings:	F1
Recommendations:	R3
City of Anaheim	90 Day Response Required
Findings:	F2
Recommendations:	R4
City of Irvine	90 Day Response Required
Findings:	F3
Recommendations:	R5
Orange County Transportation Authority	90 Day Response Required
Findings:	F1, F2, F4
Recommendations:	R1, R4, R8

Southern California Association of Governments	90 Day Response Required
Findings:	F4
Recommendations:	R6

Southern California Regional Rail Authority (as governing Board of Metrolink)	90 Day Response Required
Findings:	F4, F5, F6
Recommendations:	R7, R8

Glossary and Acronyms

Amtrak	American Track
ADA	Americans with Disabilities Act
APM	Automated People Mover
ART	Anaheim Resort Transportation
ATMP	Airfield & Terminal Modernization Project
ATN	Anaheim Transportation Network
CAGR	Compound Annual Growth Rate
Caltrans	California Department of Transportation
ConRAC	Consolidated Rent-A-Car
CTA	Central Terminal Area
EV	Electric Vehicle
EVE	Everyone Ventures Everywhere
FAA	Federal Aviation Administration
IBC	Irvine Business Complex
ITF	Intermodal Transportation Facility
JPA	Joint Powers Authority
LACMTA or LA Metro	Los Angeles County Metropolitan Transportation Authority
LAMP	Landside Access Modernization Program

LAWA	Los Angeles World Airports
LAX	Los Angeles International Airport
LOSSAN	Los Angeles – San Diego – San Luis Obispo
MOU	Memorandum of Understanding
MPO	Metropolitan Planning Organization
NTS	Norwalk Transit System
OC	Orange County
OCTA	Orange County Transportation Authority
RTP/SCS	Regional Transportation Plan/Sustainable Community Strategy
SCAG	Southern California Association of Governments
SNA	John Wayne Airport
TNC	Transportation Network Company
TOD	Transportation Oriented Development
WMSP	Westminster Mall Specific Plan

Bibliography

Amtrak. *The Amtrak App*. Accessed November 1, 2025. <https://www.amtrak.com/app>.

Anaheim Transportation Network (ATN). Accessed November 1, 2025. <https://rideart.org/>.

Anaheim Transportation Network. *A-Way WeGo*. Accessed November 1, 2025. <https://rideart.org/awaywego-app/>.

Animalia-Life. *New Metrolink Train*. [Cover page upper right image of Metrolink train]. Photograph. Accessed December 15, 2025. <https://www.animalia-life.club/qa/pictures/new-metrolink-train>.

Boston Logan. *Logan Express*. Accessed November 2, 2025. <https://www.massport.com/logan-airport/getting-to-logan/logan-express>

City of Irvine. *Irvine Shuttle*. Accessed November 1, 2025. <https://cityofirvine.org/public-works-department/irvine-shuttle>.

Discover Los Angeles. “The Landside Access Modernization Program Will Transform LAX.” August 10, 2023. Accessed September 15, 2025.

<https://www.discoverlosangeles.com/Business%2520Services/the-landside-access-modernization-program-will-transform-lax>.

Eakin, Marah. “WTF Is Going on With L.A.’s LAX Metro Connector.” *Fodor’s*, March 4, 2025. <https://www.fodors.com/world/north-america/usa/california/los-angeles/experiences/news/inside-laxs-new-people-mover-metro-connection-delays-what-to-expect>.

Fine, Howard. “LAX Slips to 5th Busiest in the Nation.” *Los Angeles Business Journal*, February 10, 2025. <https://labusinessjournal.com/featured/lax-slips-to-5th-busiest-in-the-nation/>.

FlyAway®. *LAX FlyAway® Bus*. Accessed November 1, 2025. <https://www.flylax.com/flyaway-bus>.

Gateway LA. “Project: LAX Automated People Mover (APM).” *Gateway LAX Airport Business District*. Accessed November 1, 2025. <https://www.gatewayla.org/project-lax-automated-people-mover-apm>.

Irvine Community News & Views iMessage. “Free Irvine CONNECT Shuttle Bus Has Expanded Routes.” October 2, 2025. <https://irvinecommunitynewsandviews.org/free-irvine-connect-shuttle-bus-has-expanded-routes/>.

John Wayne Airport. “John Wayne Airport Posts September 2025 Statistics.” *News Releases*. Accessed November 1, 2025. <https://www.ocair.com/news/2025/10/22/statistics-september-2025/>.

John Wayne Airport. “Statistics.” *News & Info*. Accessed November 1, 2025. <https://www.ocair.com/about/news-info/statistics/>.

Kubwa, M. “\$2 Billion LAX’s People Mover Completion Set for Late 2025.” *Construction Review*, April 5, 2024. <https://constructionreviewonline.com/construction-news/usa/2-billion-laxs-people-mover-completion-set-for-late-2025/>.

Los Angeles County Grand Jury. “LAX - Automated People Mover, \$880,000,000 of Change Orders! – So What?” *Grand Jury Report*, June 30, 2025, 551–602. <https://www.grandjury.co.la.ca.us/pdf/2024-25%20Los%20Angeles%20County%20Civil%20Grand%20Jury%20Final%20Report.pdf>

Los Angeles County Metropolitan Transportation Authority. *Metro*. Accessed November 1, 2025. <https://www.metro.net>.

LA Metro. *Interactive Estimate Ridership Stats*. Accessed November 2, 2025.

<https://opa.metro.net/MetroRidership/>

LA Metro. *LAX Metro Transit Center Opening Drives Dramatic Increase in Ridership on K Line*. Accessed November 2, 2025. <https://www.metro.net/about/lax-metro-transit-center-opening-drives-dramatic-increase-in-ridership-on-k-line/#:~:text=Overall%20System%20Ridership%20and%20Experience,reasons%20cited%20for%20the%20improvement.>

LA Metro. *Rider Apps*. Accessed November 1, 2025. <https://www.metro.net/riding/rider-apps/>.

Los Angeles County Sheriff's Department. *Transit Services Bureau Weekly Report*, October 14, 2025. <https://lasd.org/transit-services-bureau-weekly-report-68/>.

Los Angeles World Airports. "Airfield and Terminal Modernization Project (ATMP) Roadway Improvements Project." *Airport Development Group*. Accessed November 1, 2025. <https://www.lawa.org/transforminglax/projects/atmp-roadways>.

Los Angeles World Airports. "Automated People Mover (APM) Train System." *The Development Group*. Accessed November 1, 2025. <https://www.lawa.org/transforminglax/projects/automated-people-mover-train-system>.

Los Angeles World Airports. *Board of Airport Commissioners Minutes: Regular Meeting @ LAX*, August 3, 2023. https://lawa.granicus.com/player/clip/980?view_id=4&meta_id=62526&redirect=true.

Los Angeles World Airports. "Consolidated Rent-A-Car Facility." *Connecting LAX*. Accessed November 1, 2025. <https://www.lawa.org/connectinglax/consolidated-rent-a-car-facility>.

Los Angeles World Airports. *Welcome to LAWA, the governing body for LAX and Van Nuys Airports*. Accessed November 1, 2025. <https://www.lawa.org>.

Los Angeles World Airports. "LAX Capital Program Plan of Finance and Key Metrics." *LAWA Legislative Update*, March 13, 2025. <https://www.lawa.org/sites/lawa/files/2025-03/3.%20Management%20Report%20C%20-%20Capital%20Finance%20Plan.pdf>.

Los Angeles World Airports. *Monthly Ground Transportation Traffic Statistics*. Accessed November 1, 2025. <https://www.lawa.org/lawa-investor-relations/statistics-for-lax/ground-transportation-traffic-statistics>.

Los Angeles World Airports. *10-Year Summary*. Accessed November 1, 2025.

<https://www.lawa.org/lawa-investor-relations/statistics-for-lax/10-year-summary/passengers>.

Los Angeles World Airports. *Vehicle Access Policy Post-Automated People Mover (APM)*. Board of Airport Commissioners Management Report, August 3, 2023.

https://lawa.granicus.com/MetaViewer.php?view_id=4&clip_id=980&meta_id=62527.

Los Angeles World Airports. *Volume of Air Traffic*. Accessed November 1, 2025.

<https://www.lawa.org/lawa-investor-relations/statistics-for-lax/volume-of-air-traffic>.

Metrolink. *Welcome to Metrolink*. Accessed November 1, 2025.

<https://metrolinktrains.com>.

Metrolink. *FlyAway®*. Accessed November 1, 2025. <https://metrolinktrains.com/rider-info/general-info/flyaway/>.

Metrolink. *Metrolink App*. Accessed November 1, 2025.

<https://metrolinktrains.com/ticketsOverview/where-to-buy/mobile-app/>.

Metrolink. *Parking at Train Stations*. Accessed November 1, 2025.

<https://metrolinktrains.com/rider-info/general-info/parking-at-train-stations/>.

Minneapolis Metro Transit. *Airport*. Accessed November 2, 2025.

<https://www.metrotransit.org/airport>

Norwalk Transit System (NTS). Accessed November 1, 2025.

https://www.norwalk.org/departments_services/norwalk_transit_system_nts/index.php.

Ohanesian, Liz. "Day Trip on a Budget Throughout Southern California with Metrolink." *Orange County Register*, September 9, 2025.

<https://www.ocregister.com/2025/09/09/day-trip-on-a-budget-throughout-southern-california-with-metrolink/>.

Orange County Grand Jury (2025 – 2026). [Cover page lower left image of FlyAway® bus]. Photograph, November 10, 2025. Unpublished internal documentation.

Orange County Grand Jury (2025 – 2026). [Cover page lower right image of Automated People Mover]. Photograph, November 10, 2025. Unpublished internal documentation.

Orange County Transportation Authority. Accessed November 1, 2025.

<https://www.octa.net>.

Orange County Transportation Authority. *Connecting Orange County*. Accessed January 18, 2026. <https://www.octa.net/about/about-octa/overview>.

Orange County Transportation Authority. *The OC Bus Mobile App*. Accessed November 1, 2025. <https://www.octa.net/getting-around/bus/oc-bus/oc-bus-app/overview>.

Orange County Transportation Authority. *Orangethorpe Transit Village Conceptual Study*. Accessed November 1, 2025. <https://www.octa.net/programs-projects/programs/plans-and-studies/orangethorpe-transit-village-conceptual-study/>.

Orange County Transportation Authority. *Transit-Supportive Design Guidelines*. Accessed November 1, 2025. <https://www.octa.net/news/publications/transit-supportive-guidelines>.

Orange County Transportation Authority. *2024 OC Transit Vision*. May 2025. https://www.octa.net/pdf/OCTV_FullReport.pdf.

Orange County Transportation Authority. *2024 OC Transit Vision: Appendix A – State of OC Transit*. May 2025. https://www.octa.net/pdf/OCTV_AppendixA.pdf.

Orange County Transportation Authority. *About WAVE Card*. Accessed November 1, 2025. <https://wave.octa.net/en/wave-card/about-wave-card/>.

Pacific Surfliner. *Your SoCal ride with a view*. Accessed November 1, 2025. <https://www.pacificsurfliner.com/>.

Public CEO. *OCTA plans to use state funds to welcome back bus riders*. [Cover page upper left image of OCTA bus]. Photograph. Accessed December 15, 2025. [https://www.publicceo.com/2022/08/orange-county-transportation-authoritys-student-bus-pass-program-expands-to-all-county-community-colleges/#lightbox\[gallery76351\]/0](https://www.publicceo.com/2022/08/orange-county-transportation-authoritys-student-bus-pass-program-expands-to-all-county-community-colleges/#lightbox[gallery76351]/0).

Schlepp, Travis. “What Happened After LA Metro Paused Its Tap-to-Exit Program.” *KTLA*. September 15, 2025. <https://ktla.com/news/travel/what-happened-after-la-metro-paused-its-tap-to-exit-program/>.

Southern California Association of Governments. *2024–25 President’s Report*. May 2025. https://scag.ca.gov/sites/default/files/2025-05/24-0022-2025GA-PresidentsReport_Final.pdf.

Southern California Association of Governments. *Connect SoCal 2024: A Plan for Navigating to a Brighter Future*. Adopted April 4, 2024. <https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf>.

Southern California Association of Governments. *Connect SoCal 2024: Aviation & Airport Ground Access Technical Report*. Adopted April 4, 2024.

<https://scag.ca.gov/sites/default/files/2024-05/23-2987-tr-aviation-airport-ground-access-final-040424.pdf>.

Southern California Association of Governments. *Connect SoCal 2024: Demographics & Growth Forecast Technical Report*. Adopted April 4, 2024.

<https://scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf>.

Southern California Association of Governments. Aviation. *SoCal Airport Access and Mobility Study*. Accessed November 20, 2025. <https://scag.ca.gov/aviation-program>.

Still Protecting Our Newport (SPON). *John Wayne Airport*. Accessed November 1, 2025. <https://spon-newportbeach.org/John-Wayne-Airport.html>.

TAP. *TAP is your ticket to ride*. Accessed November 1, 2025. <https://www.taptogo.net/>.

Transit. *Your license to a car-free life*. Accessed November 1, 2025. <https://transitapp.com/>.

Visit Anaheim. *Anaheim Regional Transportation Intermodal Center*. Accessed November 1, 2025. <https://www.visitanaheim.org/plan-your-trip/transportation/artic/>.

Appendix A

Los Angeles World Airports Traffic and Vehicle Data

Table 3 LAX Traffic Comparison for September 2025

Los Angeles World Airports (LAWA) Traffic Comparison (TCOM) Los Angeles International Airport Calendar YTD January to September						
	Sep-2025	Sep-2024	% Change	Jan-2025 to Sep-2025	Jan-2024 to Sep-2024	% Change
Passenger Traffic Totals						
Domestic	3,942,661	4,240,358	-7.02 %	37,582,019	39,416,944	-4.66 %
International	1,866,574	1,968,016	-5.15 %	17,869,382	18,235,631	-2.01 %
Total	5,809,235	6,208,374	-6.43 %	55,451,401	57,652,575	-3.82 %
Domestic Passengers						
Scheduled Carriers	3,940,315	4,238,663	-7.04 %	37,554,861	39,400,427	-4.68 %
Commuter Carriers	579	0	100.00 %	12,885	91	14,059.34 %
Charter Carriers	1,767	1,695	4.25 %	14,273	16,426	-13.11 %
Total	3,942,661	4,240,358	-7.02 %	37,582,019	39,416,944	-4.66 %
International Passengers						
Tom Bradley Intl	1,045,693	1,091,068	-4.16 %	9,851,967	9,950,908	-0.99 %
West Gates-MSC	439,328	434,496	1.11 %	3,870,304	3,771,001	2.63 %
Terminal 6	193,915	191,410	1.31 %	1,932,838	1,942,379	-0.49 %
Terminal 7	79,089	104,027	-23.97 %	950,330	1,077,046	-11.77 %
Terminal 2	47,581	86,047	-44.70 %	575,720	751,408	-23.38 %
All Other Terminals	60,968	60,968	0.00 %	688,223	742,889	-7.36 %
Total	1,866,574	1,968,016	-5.15 %	17,869,382	18,235,631	-2.01 %
US Customs Arrivals by Terminal						
Tom Bradley Intl	829,419	858,769	-3.42 %	7,983,718	7,920,228	0.80 %
Terminal 7	74,822	71,461	4.70 %	773,860	791,700	-2.25 %
Terminal 2	214	0	100.00 %	214	0	100.00 %
Terminal 5	0	0	0.00 %	0	0	0.00 %
Terminal 4	0	0	0.00 %	0	0	0.00 %
All Other Terminals	0	0	0.00 %	0	0	0.00 %
Total	904,455	930,230	-2.77 %	8,757,792	8,711,928	0.53 %
Air Cargo (Tons)						
Mail	4,623	4,283	7.94 %	44,570	35,610	25.16 %
Freight	179,165	191,177	-6.28 %	1,594,909	1,761,083	-9.44 %
Total	183,788	195,459	-5.97 %	1,639,479	1,796,693	-8.75 %
FAA Aircraft Movement						
Air Carrier	43,941	44,896	-2.13 %	409,915	409,501	0.10 %
Air Taxi	1,647	1,690	-2.54 %	16,311	15,302	6.59 %
General Aviation	904	1,139	-20.63 %	9,145	9,581	-4.55 %
Military	17	29	-41.38 %	233	314	-25.80 %
Total	46,509	47,754	-2.61 %	435,604	434,698	0.21 %

Source: lawa.org

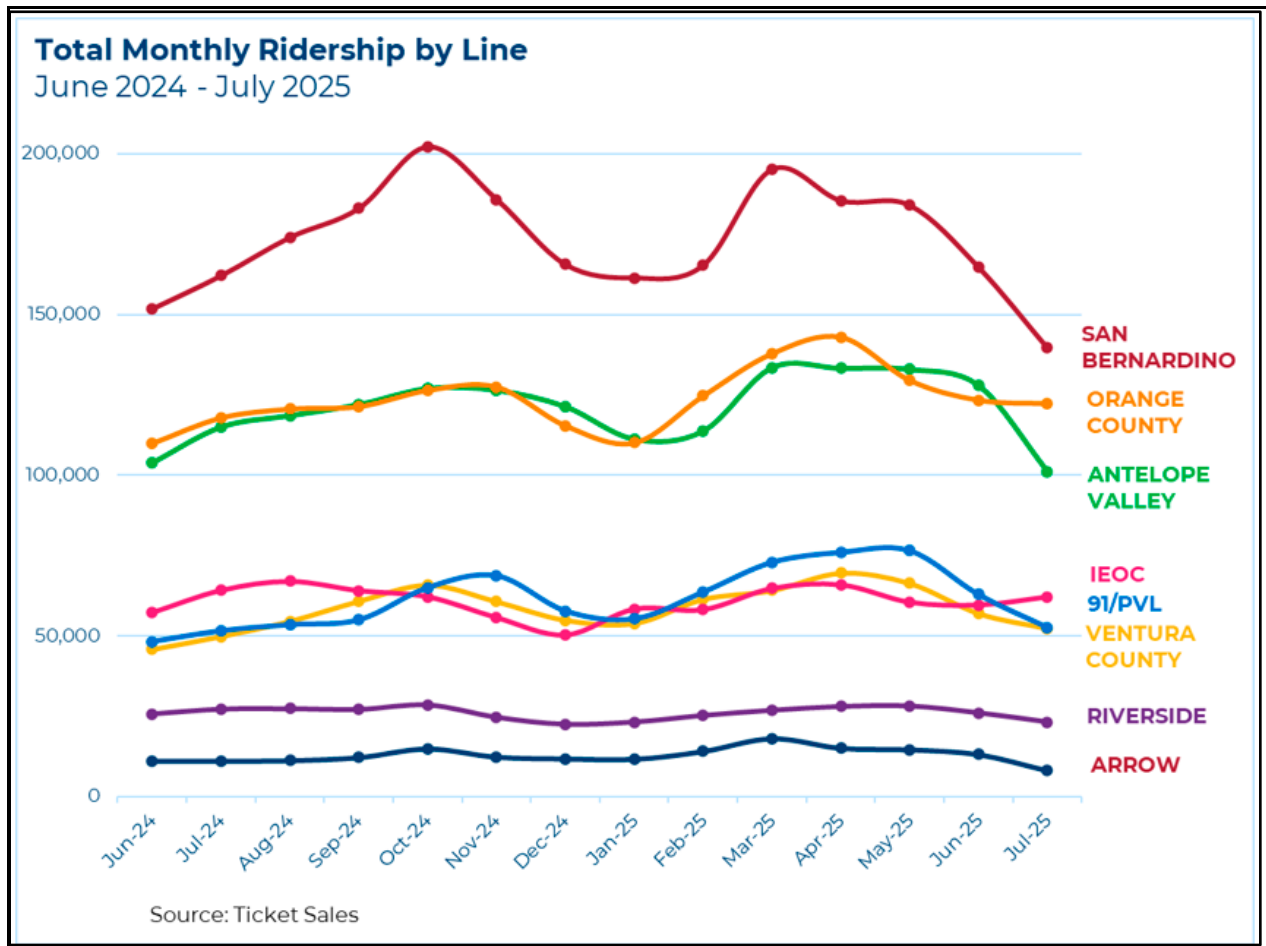
Table 4 LAX Ground Transportation Monthly Report for September 2025

Los Angeles World Airports (LAWA) Los Angeles International Airport (LAX)											
Ground Transportation Monthly Report All Commercial Vehicle Activity											
Operator Type	September 2025		Current Month		Year Prior		Year-to-Date Comparison				
	Upper & Lower Level Volumes		Sep 2025		Sep 2024		Jan to Sep 2025		Jan to Sep 2024		YTD % Change
	Monthly	Daily Avg	Monthly	Daily Avg	Monthly	Daily Avg	YTD Totals	YTD Daily Avg	Last YTD Totals	Last YTD Daily Avg	
CHALET											
TRANSPORTATION CHARTER PARTY (TCP)	252,609	8,420	9.3%		257,345	5,245	5.3%	60.5%	1,734,032	6,329	37.2%
TRANSPORTATION NETWORK COMPANY (TNC)	555,409	18,847	20.9%		655,983	21,899	22.3%	-13.9%	5,103,838	18,627	-7.6%
Total Charter	818,018	27,267	30.3%		913,328	27,144	27.6%	0.5%	6,837,870	24,956	0.7%
COURTESY											
HOTEL/MOTEL	32,383	1,079	1.2%		38,824	1,294	1.3%	-16.6%	323,487	1,181	-17.6%
PRIVATE PARKING	26,444	881	1.0%		24,478	816	0.8%	8.0%	219,166	800	11.9%
RENTAL-CAR AIRPORT	41,107	1,370	1.5%		43,311	1,444	1.5%	-5.1%	371,799	1,357	2.0%
Total Courtesy	99,934	3,331	3.7%		106,613	3,554	3.6%	-6.3%	914,452	3,337	-4.0%
PASSENGER STAGE CORPORATION (PSC)											
SCHEDULED SERVICE	2,486	83	0.1%		2,000	67	0.1%	24.3%	21,103	77	27.1%
SHARED-RIDE	7	0	0.0%		13	0	0.0%	-46.2%	43	0	-78.3%
Total PSC	2,493	83	0.1%		2,013	67	0.1%	23.8%	21,146	77	25.9%
TAXI											
TAXI	67,258	2,241	2.5%		85,171	2,839	2.9%	-21.1%	593,445	2,166	-13.8%
Total Taxi	67,258	2,241	2.5%		85,171	2,839	2.9%	-21.1%	593,445	2,166	-13.8%
LAWA											
FLUXUS	6,366	208	0.2%		5,730	214	0.2%	-7.2%	56,810	207	-13.0%
LAX SHUTTLE	7,721	257	0.3%		9,783	326	0.3%	-21.1%	87,812	320	17.9%
Total LAWA	13,987	466	0.5%		15,513	540	0.5%	-15.4%	144,622	528	3.5%
COMMERCIAL TOTAL	1,001,630	33,338	37.0%		1,014,638	34,135	34.7%	-3.2%	8,511,495	31,064	-6.9%
PRIVATE VEHICLES	1,702,302	56,743	63.0%		1,927,648	64,255	65.3%	-11.7%	15,238,517	59,266	-7.5%
Total Vehicle Volumes	2,703,932	90,131	100.0%		2,942,286	98,410	100.0%	-8.4%	23,750,012	90,330	-9.3%

Source: lawa.org

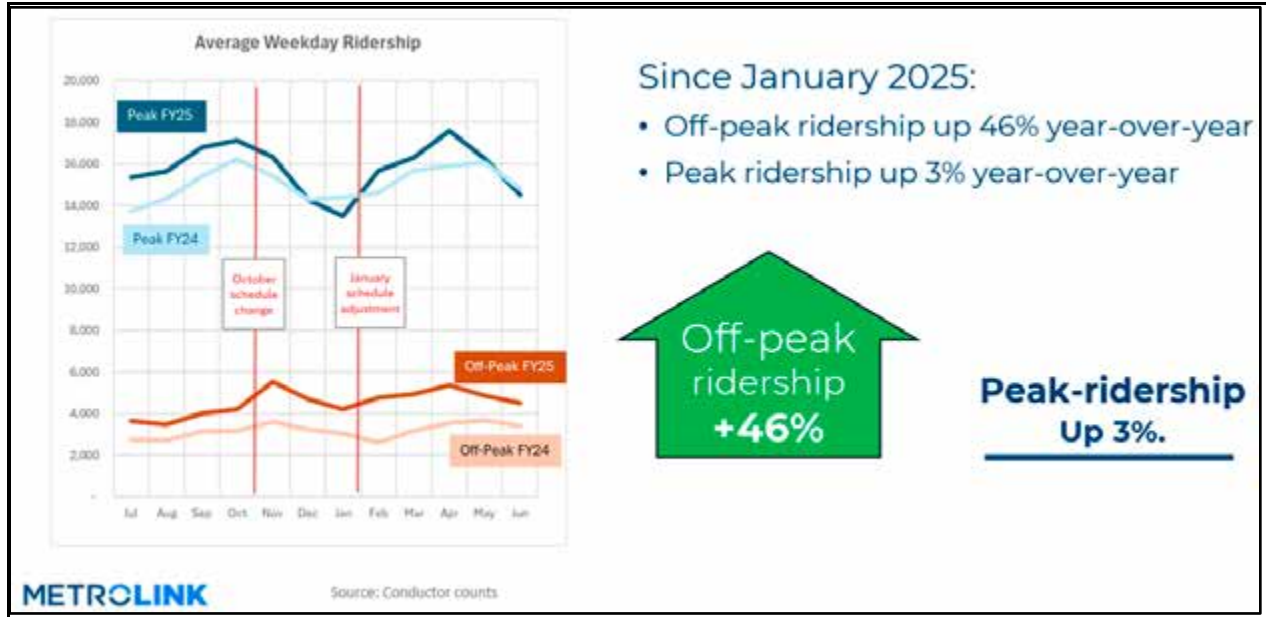
Appendix B

Metrolink Ridership Data



Source: Metrolink

Figure 7 Metrolink Systemwide Ridership



Source: Metrolink

Figure 8 Peak/Off-Peak Ridership Analysis

Appendix C

Public Transportation References

- **FlyAway® Bus**
 - <https://www.flylax.com/flyaway-bus>
 - Schedule: Union Station - LAX
 - <https://www.flylax.com/flyaway-bus/union-station>
- **LA Metro**
 - <https://www.metro.net/>
 - Schedule: A, C, E, J, and K Lines
 - <https://www.metro.net/riding/schedules-2/>
- **Norwalk Transportation System**
 - https://www.norwalk.org/departments_services/norwalk_transit_system_nts/index.php
 - Schedule: Buses 4 and 7
 - https://www.norwalk.org/departments_services/norwalk_transit_system_nts/fares.php
- **Metrolink**
 - <https://metrolinktrains.com/>
 - Schedule
 - <https://metrolinktrains.com/>
- **Amtrak Pacific Surfliner**
 - <https://www.pacificsurfliner.com/>
 - Schedule
 - <https://www.pacificsurfliner.com/plan-your-trip/schedules/>
- **Orange County Transportation Authority**
 - <https://octa.net/>
 - Schedule: Buses 76, 83, and 460
 - <https://octa.net/getting-around/bus/oc-bus/routes-and-schedules/routes-and-schedules>

Appendix D

Route Data

Table 5 Weekday FlyAway®-to-Metrolink/Amtrak Route with Average Travel Time of Two Hours and 15 Minutes and Average Wait Time of 38 Minutes

FlyAway®		Wait Time	Metrolink / Amtrak		Transit Time	Total Wait	Total Time
LAX	Union Station		Union Station	Irvine			
5:40 AM	6:12 AM	0:28	6:40 AM	7:48 AM	1:40	0:28	2:08
6:10 AM	6:42 AM	0:28	7:10 AM	8:12 AM	1:34	0:28	2:02
6:40 AM	7:12 AM	0:28	7:40 AM	8:48 AM	1:40	0:28	2:08
7:10 AM	7:42 AM	0:28	8:10 AM	9:12 AM	1:34	0:28	2:02
7:40 AM	8:12 AM	0:28	8:40 AM	9:48 AM	1:40	0:28	2:08
8:10 AM	8:42 AM	1:28	10:10 AM	11:12 AM	1:34	1:28	3:02
8:40 AM	9:12 AM	0:58	10:10 AM	11:12 AM	1:34	0:58	2:32
9:10 AM	9:42 AM	0:28	10:10 AM	11:12 AM	1:34	0:28	2:02
9:40 AM	10:12 AM	0:28	10:40 AM	11:48 AM	1:40	0:28	2:08
10:10 AM	10:42 AM	0:28	11:10 AM	12:12 PM	1:34	0:28	2:02
10:40 AM	11:12 AM	0:58	12:10 PM	1:12 PM	1:34	0:58	2:32
11:10 AM	11:42 AM	0:28	12:10 PM	1:12 PM	1:34	0:28	2:02
11:40 AM	12:12 PM	0:28	12:40 PM	1:48 PM	1:40	0:28	2:08
12:10 PM	12:42 PM	0:42	1:24 PM	2:32 PM	1:40	0:42	2:22
12:40 PM	1:12 PM	0:12	1:24 PM	2:32 PM	1:40	0:12	1:52
1:10 PM	1:42 PM	0:58	2:40 PM	3:48 PM	1:40	0:58	2:38
1:40 PM	2:12 PM	0:28	2:40 PM	3:48 PM	1:40	0:28	2:08
2:10 PM	2:42 PM	0:28	3:10 PM	4:12 PM	1:34	0:28	2:02
2:40 PM	3:12 PM	0:28	3:40 PM	4:48 PM	1:40	0:28	2:08
3:10 PM	3:42 PM	0:28	4:10 PM	5:09 PM	1:31	0:28	1:59
3:40 PM	4:12 PM	0:28	4:40 PM	5:48 PM	1:40	0:28	2:08
4:10 PM	4:42 PM	0:28	5:10 PM	6:12 PM	1:34	0:28	2:02
4:40 PM	5:12 PM	0:28	5:40 PM	6:48 PM	1:40	0:28	2:08
5:10 PM	5:42 PM	0:28	6:10 PM	7:12 PM	1:34	0:28	2:02
5:40 PM	6:12 PM	0:28	6:40 PM	7:48 PM	1:40	0:28	2:08
6:10 PM	6:42 PM	1:28	8:10 PM	9:12 PM	1:34	1:28	3:02
6:40 PM	7:12 PM	0:58	8:10 PM	9:12 PM	1:34	0:58	2:32
7:10 PM	7:42 PM	0:28	8:10 PM	9:12 PM	1:34	0:28	2:02
7:40 PM	8:12 PM	1:28	9:40 PM	10:48 PM	1:40	1:28	3:08
8:10 PM	8:42 PM	0:58	9:40 PM	10:48 PM	1:40	0:58	2:38
8:40 PM	9:12 PM	0:28	9:40 PM	10:48 PM	1:40	0:28	2:08
9:10 PM	9:42 PM	0:28	10:10 PM	11:12 PM	1:34	0:28	2:02
				Average	1:36	0:38	2:15

Blue = Metrolink

Table 6 Weekday FlyAway®-to-Metrolink/Amtrak Route with FlyAway® Bus Arriving Five Minutes Early
Reduces Average Travel Time by 23 Minutes

FlyAway®		Wait Time	Metrolink / Amtrak		Transit Time	Total Wait	Total Time
LAX	Union Station		Union Station	Irvine			
5:35 AM	6:07 AM	0:03	6:10 AM	7:12 AM	1:34	0:03	1:37
6:05 AM	6:37 AM	0:03	6:40 AM	7:48 AM	1:40	0:03	1:43
6:35 AM	7:07 AM	0:03	7:10 AM	8:12 AM	1:34	0:03	1:37
7:05 AM	7:37 AM	0:03	7:40 AM	8:48 AM	1:40	0:03	1:43
7:35 AM	8:07 AM	0:03	8:10 AM	9:12 AM	1:34	0:03	1:37
8:05 AM	8:37 AM	0:03	8:40 AM	9:48 AM	1:40	0:03	1:43
8:35 AM	9:07 AM	1:03	10:10 AM	11:12 AM	1:34	1:03	2:37
9:05 AM	9:37 AM	0:33	10:10 AM	11:12 AM	1:34	0:33	2:07
9:35 AM	10:07 AM	0:03	10:10 AM	11:12 AM	1:34	0:03	1:37
10:05 AM	10:37 AM	0:03	10:40 AM	11:48 AM	1:40	0:03	1:43
10:35 AM	11:07 AM	0:03	11:10 AM	12:12 PM	1:34	0:03	1:37
11:05 AM	11:37 AM	0:33	12:10 PM	1:12 PM	1:34	0:33	2:07
11:35 AM	12:07 PM	0:03	12:10 PM	1:12 PM	1:34	0:03	1:37
12:05 PM	12:37 PM	0:03	12:40 PM	1:48 PM	1:40	0:03	1:43
12:35 PM	1:07 PM	0:17	1:24 PM	2:32 PM	1:40	0:17	1:57
1:05 PM	1:37 PM	1:03	2:40 PM	3:48 PM	1:40	1:03	2:43
1:35 PM	2:07 PM	0:33	2:40 PM	3:48 PM	1:40	0:33	2:13
2:05 PM	2:37 PM	0:03	2:40 PM	3:48 PM	1:40	0:03	1:43
2:35 PM	3:07 PM	0:03	3:10 PM	4:12 PM	1:34	0:03	1:37
3:05 PM	3:37 PM	0:03	3:40 PM	4:48 PM	1:40	0:03	1:43
3:35 PM	4:07 PM	0:03	4:10 PM	5:09 PM	1:31	0:03	1:34
4:05 PM	4:37 PM	0:03	4:40 PM	5:48 PM	1:40	0:03	1:43
4:35 PM	5:07 PM	0:03	5:10 PM	6:12 PM	1:34	0:03	1:37
5:05 PM	5:37 PM	0:03	5:40 PM	6:48 PM	1:40	0:03	1:43
5:35 PM	6:07 PM	0:03	6:10 PM	7:12 PM	1:34	0:03	1:37
6:05 PM	6:37 PM	0:03	6:40 PM	7:48 PM	1:40	0:03	1:43
6:35 PM	7:07 PM	1:03	8:10 PM	9:12 PM	1:34	1:03	2:37
7:05 PM	7:37 PM	0:33	8:10 PM	9:12 PM	1:34	0:33	2:07
7:35 PM	8:07 PM	0:03	8:10 PM	9:12 PM	1:34	0:03	1:37
8:05 PM	8:37 PM	1:03	9:40 PM	10:48 PM	1:40	1:03	2:43
8:35 PM	9:07 PM	0:33	9:40 PM	10:48 PM	1:40	0:33	2:13
9:05 PM	9:37 PM	0:03	9:40 PM	10:48 PM	1:40	0:03	1:43
9:35 PM	10:07 PM	0:03	10:10 PM	11:12 PM	1:34	0:03	1:37
				Average	1:36	0:15	1:52

Blue = Metrolink

Table 7 Weekend FlyAway®-to-Metrolink/Amtrak Route with Average Travel Time of Two Hours and 15 Minutes and Average Wait Time of 38 Minutes

FlyAway®		Wait Time	Metrolink / Amtrak		Transit Time	Total Wait	Total Time
LAX	Union Station		Union Station	Irvine			
5:40 AM	6:12 AM	0:58	7:10 AM	8:12 AM	1:34	0:58	2:32
6:10 AM	6:42 AM	0:28	7:10 AM	8:12 AM	1:34	0:28	2:02
6:40 AM	7:12 AM	0:58	8:10 AM	9:12 AM	1:34	0:58	2:32
7:10 AM	7:42 AM	0:28	8:10 AM	9:12 AM	1:34	0:28	2:02
7:40 AM	8:12 AM	0:28	8:40 AM	9:49 AM	1:41	0:28	2:09
8:10 AM	8:42 AM	1:28	10:10 AM	11:12 AM	1:34	1:28	3:02
8:40 AM	9:12 AM	0:58	10:10 AM	11:12 AM	1:34	0:58	2:32
9:10 AM	9:42 AM	0:28	10:10 AM	11:12 AM	1:34	0:28	2:02
9:40 AM	10:12 AM	0:38	10:50 AM	11:59 AM	1:41	0:38	2:19
10:10 AM	10:42 AM	0:08	10:50 AM	11:59 AM	1:41	0:08	1:49
10:10 AM	10:42 AM	0:28	11:10 AM	12:12 PM	1:34	0:28	2:02
10:40 AM	11:12 AM	0:58	12:10 PM	1:12 PM	1:34	0:58	2:32
11:10 AM	11:42 AM	0:28	12:10 PM	1:12 PM	1:34	0:28	2:02
11:40 AM	12:12 PM	1:48	2:00 PM	3:09 PM	1:41	1:48	3:29
12:10 PM	12:42 PM	1:18	2:00 PM	3:09 PM	1:41	1:18	2:59
12:40 PM	1:12 PM	0:48	2:00 PM	3:09 PM	1:41	0:48	2:29
1:10 PM	1:42 PM	0:18	2:00 PM	3:09 PM	1:41	0:18	1:59
1:40 PM	2:12 PM	0:58	3:10 PM	4:12 PM	1:34	0:58	2:32
2:10 PM	2:42 PM	0:28	3:10 PM	4:12 PM	1:34	0:28	2:02
2:40 PM	3:12 PM	0:58	4:10 PM	5:09 PM	1:31	0:58	2:29
3:10 PM	3:42 PM	0:28	4:10 PM	5:09 PM	1:31	0:28	1:59
3:40 PM	4:12 PM	0:15	4:27 PM	5:36 PM	1:41	0:15	1:56
4:10 PM	4:42 PM	0:28	5:10 PM	6:12 PM	1:34	0:28	2:02
4:40 PM	5:12 PM	0:58	6:10 PM	7:12 PM	1:34	0:58	2:32
5:10 PM	5:42 PM	0:28	6:10 PM	7:12 PM	1:34	0:28	2:02
5:40 PM	6:12 PM	1:58	8:10 PM	9:12 PM	1:34	1:58	3:32
6:10 PM	6:42 PM	1:28	8:10 PM	9:12 PM	1:34	1:28	3:02
6:40 PM	7:12 PM	0:58	8:10 PM	9:12 PM	1:34	0:58	2:32
7:10 PM	7:42 PM	0:28	8:10 PM	9:12 PM	1:34	0:28	2:02
7:40 PM	8:12 PM	1:58	10:10 PM	11:12 PM	1:34	1:58	3:32
8:10 PM	8:42 PM	1:28	10:10 PM	11:12 PM	1:34	1:28	3:02
8:40 PM	9:12 PM	0:58	10:10 PM	11:12 PM	1:34	0:58	2:32
9:10 PM	9:42 PM	0:28	10:10 PM	11:12 PM	1:34	0:28	2:02
				Average	1:35	0:50	2:26

Blue = Metrolink

*Table 8 Weekend FlyAway®-to-Metrolink/Amtrak Route with FlyAway® Bus Arriving Five Minutes Early
Reduces Average Travel Time by 21 Minutes*

FlyAway®		Wait Time	Metrolink / Amtrak		Transit Time	Total Wait	Total Time
LAX	Union Station		Union Station	Irvine			
5:35 AM	6:07 AM	0:03	6:10 AM	7:12 AM	1:34	0:03	1:37
6:05 AM	6:37 AM	0:33	7:10 AM	8:12 AM	1:34	0:33	2:07
6:35 AM	7:07 AM	0:03	7:10 AM	8:12 AM	1:34	0:03	1:37
7:05 AM	7:37 AM	0:33	8:10 AM	9:12 AM	1:34	0:33	2:07
7:35 AM	8:07 AM	0:03	8:10 AM	9:12 AM	1:34	0:03	1:37
8:05 AM	8:37 AM	0:03	8:40 AM	9:49 AM	1:41	0:03	1:44
8:35 AM	9:07 AM	1:03	10:10 AM	11:12 AM	1:34	1:03	2:37
9:05 AM	9:37 AM	0:33	10:10 AM	11:12 AM	1:34	0:33	2:07
9:35 AM	10:07 AM	0:03	10:10 AM	11:12 AM	1:34	0:03	1:37
10:05 AM	10:37 AM	0:13	10:50 AM	11:59 AM	1:41	0:13	1:54
10:35 AM	11:07 AM	0:03	11:10 AM	12:12 PM	1:34	0:03	1:37
11:05 AM	11:37 AM	0:33	12:10 PM	1:12 PM	1:34	0:33	2:07
11:35 AM	12:07 PM	0:03	12:10 PM	1:12 PM	1:34	0:03	1:37
12:05 PM	12:37 PM	1:23	2:00 PM	3:09 PM	1:41	1:23	3:04
12:35 PM	1:07 PM	0:53	2:00 PM	3:09 PM	1:41	0:53	2:34
1:05 PM	1:37 PM	0:23	2:00 PM	3:09 PM	1:41	0:23	2:04
1:35 PM	2:07 PM	1:03	3:10 PM	4:12 PM	1:34	1:03	2:37
2:05 PM	2:37 PM	0:33	3:10 PM	4:12 PM	1:34	0:33	2:07
2:35 PM	3:07 PM	0:03	3:10 PM	4:12 PM	1:34	0:03	1:37
3:05 PM	3:37 PM	0:33	4:10 PM	5:09 PM	1:31	0:33	2:04
3:35 PM	4:07 PM	0:03	4:10 PM	5:09 PM	1:31	0:03	1:34
3:35 PM	4:07 PM	0:20	4:27 PM	5:36 PM	1:41	0:20	2:01
4:05 PM	4:37 PM	0:33	5:10 PM	6:12 PM	1:34	0:33	2:07
4:35 PM	5:07 PM	0:03	5:10 PM	6:12 PM	1:34	0:03	1:37
5:05 PM	5:37 PM	0:33	6:10 PM	7:12 PM	1:34	0:33	2:07
5:35 PM	6:07 PM	0:03	6:10 PM	7:12 PM	1:34	0:03	1:37
6:05 PM	6:37 PM	1:33	8:10 PM	9:12 PM	1:34	1:33	3:07
6:35 PM	7:07 PM	1:03	8:10 PM	9:12 PM	1:34	1:03	2:37
7:05 PM	7:37 PM	0:33	8:10 PM	9:12 PM	1:34	0:33	2:07
7:35 PM	8:07 PM	0:03	8:10 PM	9:12 PM	1:34	0:03	1:37
8:05 PM	8:37 PM	1:33	10:10 PM	11:12 PM	1:34	1:33	3:07
8:35 PM	9:07 PM	1:03	10:10 PM	11:12 PM	1:34	1:03	2:37
9:05 PM	9:37 PM	0:33	10:10 PM	11:12 PM	1:34	0:33	2:07
9:35 PM	10:07 PM	0:03	10:10 PM	11:12 PM	1:34	0:03	1:37
Average					1:35	0:30	2:05

Blue = Metrolink

Table 9 Weekday LA Metro C Line-to-Metrolink/Amtrak Route with Average Travel Time of Two and a Half Hours and Average Wait Time of 54 Minutes

LA Metro C Line		Wait Time	Norwalk Bus 4		Wait Time	Metrolink / Amtrak		Transit Time	Total Wait	Total Time
LAX	Norwalk Station		Norwalk Station	Santa Fe Springs		Santa Fe Springs	Irvine			
4:40 AM	5:11 AM	0:05	5:16 AM	5:35 AM	0:30	6:05 AM	6:48 AM	1:33	0:35	2:08
5:10 AM	5:41 AM	0:05	5:46 AM	6:08 AM	0:57	7:05 AM	7:48 AM	1:36	1:02	2:38
5:40 AM	6:11 AM	0:05	6:16 AM	6:35 AM	0:30	7:05 AM	7:48 AM	1:33	0:35	2:08
6:10 AM	6:41 AM	0:04	6:45 AM	7:08 AM	0:57	8:05 AM	8:48 AM	1:37	1:01	2:38
6:40 AM	7:11 AM	0:08	7:19 AM	7:40 AM	0:25	8:05 AM	8:48 AM	1:35	0:33	2:08
7:10 AM	7:41 AM	0:05	7:46 AM	8:09 AM	0:56	9:05 AM	9:48 AM	1:37	1:01	2:38
7:40 AM	8:11 AM	0:05	8:16 AM	8:39 AM	0:26	9:05 AM	9:48 AM	1:37	0:31	2:08
8:00 AM	8:31 AM	0:10	8:41 AM	9:05 AM	0:00	9:05 AM	9:48 AM	1:38	0:10	1:48
8:40 AM	9:11 AM	0:25	9:36 AM	10:01 AM	1:04	11:05 AM	11:48 AM	1:39	1:29	3:08
9:10 AM	9:41 AM	0:21	10:02 AM	10:23 AM	0:42	11:05 AM	11:48 AM	1:35	1:03	2:38
9:40 AM	10:11 AM	0:26	10:37 AM	10:59 AM	0:06	11:05 AM	11:48 AM	1:36	0:32	2:08
10:00 AM	10:31 AM	0:06	10:37 AM	10:59 AM	0:06	11:05 AM	11:48 AM	1:36	0:12	1:48
10:40 AM	11:11 AM	0:08	11:19 AM	11:40 AM	1:25	1:05 PM	1:48 PM	1:35	1:33	3:08
11:10 AM	11:41 AM	0:02	11:43 AM	12:07 PM	0:58	1:05 PM	1:48 PM	1:38	1:00	2:38
11:40 AM	12:11 PM	0:25	12:36 PM	12:59 PM	0:06	1:05 PM	1:48 PM	1:37	0:31	2:08
11:59 AM	12:31 PM	0:05	12:36 PM	12:59 PM	0:06	1:05 PM	1:48 PM	1:38	0:11	1:49
12:30 PM	1:01 PM	0:08	1:09 PM	1:32 PM	0:17	1:49 PM	2:32 PM	1:37	0:25	2:02
1:10 PM	1:41 PM	0:29	2:10 PM	2:34 PM	0:31	3:05 PM	3:48 PM	1:38	1:00	2:38
1:30 PM	2:01 PM	0:09	2:10 PM	2:34 PM	0:31	3:05 PM	3:48 PM	1:38	0:40	2:18
2:10 PM	2:41 PM	0:28	3:09 PM	3:33 PM	0:32	4:05 PM	4:48 PM	1:38	1:00	2:38
2:30 PM	3:01 PM	0:08	3:09 PM	3:33 PM	0:32	4:05 PM	4:48 PM	1:38	0:40	2:18
3:10 PM	3:41 PM	0:28	4:09 PM	4:34 PM	0:31	5:05 PM	5:48 PM	1:39	0:59	2:38
3:40 PM	4:11 PM	0:27	4:38 PM	5:03 PM	0:02	5:05 PM	5:48 PM	1:39	0:29	2:08
4:00 PM	4:31 PM	0:07	4:38 PM	5:03 PM	0:02	5:05 PM	5:48 PM	1:39	0:09	1:48
4:30 PM	5:01 PM	0:01	5:02 PM	5:27 PM	0:38	6:05 PM	6:48 PM	1:39	0:39	2:18
5:10 PM	5:41 PM	0:01	5:42 PM	6:07 PM	0:58	7:05 PM	7:47 PM	1:38	0:59	2:37
5:40 PM	6:11 PM	0:05	6:16 PM	6:39 PM	0:26	7:05 PM	7:47 PM	1:36	0:31	2:07
6:10 PM	6:41 PM	0:04	6:45 PM	7:07 PM	2:58	10:05 PM	10:48 PM	1:36	3:02	4:38
6:40 PM	7:11 PM	0:24	7:35 PM	7:55 PM	2:10	10:05 PM	10:48 PM	1:34	2:34	4:08
7:10 PM	7:41 PM	0:51	8:32 PM	8:47 PM	1:18	10:05 PM	10:48 PM	1:29	2:09	3:38
7:40 PM	8:11 PM	0:21	8:32 PM	8:47 PM	1:18	10:05 PM	10:48 PM	1:29	1:39	3:08
8:10 PM	8:41 PM	0:28	9:09 PM	9:22 PM	0:43	10:05 PM	10:48 PM	1:27	1:11	2:38
8:40 PM	9:11 PM	0:38	9:49 PM	10:02 PM	0:03	10:05 PM	10:48 PM	1:27	0:41	2:08
9:00 PM	9:31 PM	0:18	9:49 PM	10:02 PM	0:03	10:05 PM	10:48 PM	1:27	0:21	1:48
Average		0:14			0:40			1:35	0:54	2:30

Blue = Metrolink

Table 10 Weekend LA Metro C Line-to-Metrolink/Amtrak Route with Last Departure from LAX at 3:40 PM and Average Travel Time in Excess of Three Hours

LA Metro C Line		Wait Time	Norwalk Bus 4 and 7		Wait Time	Metrolink / Amtrak		Transit Time	Total Wait	Total Time
LAX	Norwalk Station		Norwalk Station	Santa Fe Springs		Santa Fe Springs	Irvine			
7:10 AM	7:41 AM	0:19	8:00 AM	8:18 AM	0:45	9:03 AM	9:49 AM	1:35	1:04	2:39
7:50 AM	8:21 AM	0:04	8:25 AM	8:39 AM	0:24	9:03 AM	9:49 AM	1:31	0:28	1:59
8:10 AM	8:41 AM	0:09	8:50 AM	9:08 AM	2:05	11:13 AM	11:59 AM	1:35	2:14	3:49
8:40 AM	9:11 AM	0:29	9:40 AM	9:58 AM	1:15	11:13 AM	11:59 AM	1:35	1:44	3:19
9:10 AM	9:41 AM	0:49	10:30 AM	10:50 AM	0:23	11:13 AM	11:59 AM	1:37	1:12	2:49
9:50 AM	10:21 AM	0:09	10:30 AM	10:50 AM	0:23	11:13 AM	11:59 AM	1:37	0:32	2:09
10:10 AM	10:41 AM	0:39	11:20 AM	11:40 AM	2:44	2:24 PM	3:09 PM	1:36	3:23	4:59
10:40 AM	11:11 AM	0:09	11:20 AM	11:40 AM	2:44	2:24 PM	3:09 PM	1:36	2:53	4:29
11:10 AM	11:41 AM	0:29	12:10 PM	12:30 PM	1:54	2:24 PM	3:09 PM	1:36	2:23	3:59
11:40 AM	12:11 PM	0:49	1:00 PM	1:20 PM	1:04	2:24 PM	3:09 PM	1:36	1:53	3:29
12:10 PM	12:41 PM	0:19	1:00 PM	1:20 PM	1:04	2:24 PM	3:09 PM	1:36	1:23	2:59
12:40 PM	1:11 PM	0:39	1:50 PM	2:10 PM	0:14	2:24 PM	3:09 PM	1:36	0:53	2:29
1:10 PM	1:41 PM	0:09	1:50 PM	2:10 PM	0:14	2:24 PM	3:09 PM	1:36	0:23	1:59
1:40 PM	2:11 PM	0:29	2:40 PM	3:00 PM	1:50	4:50 PM	5:36 PM	1:37	2:19	3:56
2:10 PM	2:41 PM	0:49	3:30 PM	3:50 PM	1:00	4:50 PM	5:36 PM	1:37	1:49	3:26
2:40 PM	3:11 PM	0:19	3:30 PM	3:50 PM	1:00	4:50 PM	5:36 PM	1:37	1:19	2:56
3:10 PM	3:41 PM	0:39	4:20 PM	4:40 PM	0:10	4:50 PM	5:36 PM	1:37	0:49	2:26
3:40 PM	4:11 PM	0:09	4:20 PM	4:40 PM	0:10	4:50 PM	5:36 PM	1:37	0:19	1:56
Average		0:25			1:04			1:35	1:30	3:05

Blue = Metrolink

Orange = Bus 7 (No Service on Sundays)

Table 11 Weekday Metrolink/Amtrak-to-FlyAway® Route with Average Travel Time of One Hour and a 48 Minutes and Average Wait Time of only Seven Minutes

Metrolink / Amtrak		Wait Time	FlyAway®		Transit Time	Total Wait	Total Time
Irvine	Union Station		Union Station	LAX			
5:12 AM	6:20 AM	0:10	6:30 AM	7:03 AM	1:41	0:10	1:51
5:49 AM	6:57 AM	0:03	7:00 AM	7:33 AM	1:41	0:03	1:44
6:12 AM	7:20 AM	0:10	7:30 AM	8:03 AM	1:41	0:10	1:51
7:12 AM	8:20 AM	0:10	8:30 AM	9:03 AM	1:41	0:10	1:51
7:49 AM	8:57 AM	0:03	9:00 AM	9:33 AM	1:41	0:03	1:44
8:12 AM	9:20 AM	0:10	9:30 AM	10:03 AM	1:41	0:10	1:51
9:12 AM	10:20 AM	0:10	10:30 AM	11:03 AM	1:41	0:10	1:51
9:49 AM	10:52 AM	0:08	11:00 AM	11:33 AM	1:36	0:08	1:44
10:12 AM	11:20 AM	0:10	11:30 AM	12:03 PM	1:41	0:10	1:51
11:49 AM	12:57 PM	0:03	1:00 PM	1:33 PM	1:41	0:03	1:44
1:12 PM	2:20 PM	0:10	2:30 PM	3:03 PM	1:41	0:10	1:51
1:49 PM	2:57 PM	0:03	3:00 PM	3:33 PM	1:41	0:03	1:44
2:49 PM	3:57 PM	0:03	4:00 PM	4:33 PM	1:41	0:03	1:44
3:12 PM	4:20 PM	0:10	4:30 PM	5:03 PM	1:41	0:10	1:51
3:52 PM	4:57 PM	0:03	5:00 PM	5:33 PM	1:38	0:03	1:41
4:12 PM	5:20 PM	0:10	5:30 PM	6:03 PM	1:41	0:10	1:51
5:12 PM	6:20 PM	0:10	6:30 PM	7:03 PM	1:41	0:10	1:51
5:52 PM	6:57 PM	0:03	7:00 PM	7:33 PM	1:38	0:03	1:41
6:12 PM	7:20 PM	0:10	7:30 PM	8:03 PM	1:41	0:10	1:51
6:53 PM	8:04 PM	0:26	8:30 PM	9:03 PM	1:44	0:26	2:10
7:12 PM	8:20 PM	0:10	8:30 PM	9:03 PM	1:41	0:10	1:51
8:12 PM	9:20 PM	0:10	9:30 PM	10:03 PM	1:41	0:10	1:51
8:49 PM	9:57 PM	0:03	10:00 PM	10:33 PM	1:41	0:03	1:44
9:49 PM	10:57 PM	0:03	11:00 PM	11:33 PM	1:41	0:03	1:44
				Average	1:40	0:07	1:48

Blue = Metrolink

Table 12 Weekend Metrolink/Amtrak-to-FlyAway® Route with Average Travel Time of One Hour and a 52 Minutes and Average Wait Time of only Ten Minutes

Metrolink / Amtrak		Wait Time	FlyAway®		Transit Time	Total Wait	Total Time
Irvine	Union Station		Union Station	LAX			
5:49 AM	6:57 AM	0:03	7:00 AM	7:33 AM	1:41	0:03	1:44
7:49 AM	8:57 AM	0:03	9:00 AM	9:33 AM	1:41	0:03	1:44
9:21 AM	10:34 AM	0:26	11:00 AM	11:33 AM	1:46	0:26	2:12
9:49 AM	10:52 AM	0:08	11:00 AM	11:33 AM	1:36	0:08	1:44
11:49 AM	12:57 PM	0:03	1:00 PM	1:33 PM	1:41	0:03	1:44
12:22 PM	1:34 PM	0:26	2:00 PM	2:33 PM	1:45	0:26	2:11
1:49 PM	2:57 PM	0:03	3:00 PM	3:33 PM	1:41	0:03	1:44
2:23 PM	3:39 PM	0:21	4:00 PM	4:33 PM	1:49	0:21	2:10
2:49 PM	3:57 PM	0:03	4:00 PM	4:33 PM	1:41	0:03	1:44
3:52 PM	4:57 PM	0:03	5:00 PM	5:33 PM	1:38	0:03	1:41
5:52 PM	6:57 PM	0:03	7:00 PM	7:33 PM	1:38	0:03	1:41
6:21 PM	7:38 PM	0:22	8:00 PM	8:33 PM	1:50	0:22	2:12
6:53 PM	8:04 PM	0:26	8:30 PM	9:03 PM	1:44	0:26	2:10
8:49 PM	9:57 PM	0:03	10:00 PM	10:33 PM	1:41	0:03	1:44
9:49 PM	10:57 PM	0:03	11:00 PM	11:33 PM	1:41	0:03	1:44
				Average	1:42	0:10	1:52

Blue = Metrolink

Table 13 Weekday Metrolink/Amtrak-to-LA Metro C Line Route with Average Travel Time of One Hour and 47 Minutes but only One Train during Mid-Day

Metrolink / Amtrak		Wait Time	Norwalk Bus 4		Wait Time	LA Metro C Line		Transit Time	Total Wait	Total Time
Irvine	Santa Fe Springs		Santa Fe Springs	Norwalk Station		Norwalk Station	LAX			
5:12 AM	5:57 AM	0:04	6:01 AM	6:16 AM	0:09	6:25 AM	6:55 AM	1:30	0:13	1:43
6:12 AM	6:57 AM	0:03	7:00 AM	7:17 AM	0:08	7:25 AM	7:55 AM	1:32	0:11	1:43
7:12 AM	7:57 AM	0:06	8:03 AM	8:21 AM	0:04	8:25 AM	8:55 AM	1:33	0:10	1:43
8:12 AM	8:57 AM	0:12	9:09 AM	9:26 AM	0:09	9:35 AM	10:05 AM	1:32	0:21	1:53
9:12 AM	9:57 AM	0:04	10:01 AM	10:18 AM	0:07	10:25 AM	10:55 AM	1:32	0:11	1:43
10:12 AM	10:57 AM	0:03	11:00 AM	11:17 AM	0:08	11:25 AM	11:55 AM	1:32	0:11	1:43
1:12 PM	1:57 PM	0:02	1:59 PM	2:17 PM	0:08	2:25 PM	2:55 PM	1:33	0:10	1:43
3:12 PM	3:57 PM	0:00	3:57 PM	4:16 PM	0:09	4:25 PM	4:55 PM	1:34	0:09	1:43
4:12 PM	4:57 PM	0:10	5:07 PM	5:27 PM	0:08	5:35 PM	6:05 PM	1:35	0:18	1:53
5:12 PM	5:57 PM	0:04	6:01 PM	6:19 PM	0:06	6:25 PM	6:55 PM	1:33	0:10	1:43
6:12 PM	6:57 PM	0:04	7:01 PM	7:18 PM	0:07	7:25 PM	7:55 PM	1:32	0:11	1:43
7:12 PM	7:57 PM	0:17	8:14 PM	8:29 PM	0:16	8:45 PM	9:15 PM	1:30	0:33	2:03
8:12 PM	8:57 PM	0:29	9:26 PM	9:40 PM	0:05	9:45 PM	10:15 PM	1:29	0:34	2:03
Average		0:07			0:08			1:32	0:15	1:47

Blue = Metrolink

Table 14 Weekend Metrolink/Amtrak-to-LA Metro C Line Route with Earliest Arrival to LAX at 11:45 AM and Average Travel Time of Two Hours and Eight Minutes

Metrolink / Amtrak		Wait Time	Norwalk Bus 4		Wait Time	LA Metro C Line		Transit Time	Total Wait	Total Time
Irvine	Santa Fe Springs		Santa Fe Springs	Norwalk Station		Norwalk Station	LAX			
9:21 AM	10:05 AM	0:50	10:55 AM	11:10 AM	0:05	11:15 AM	11:45 AM	1:29	0:55	2:24
12:22 PM	1:06 PM	0:22	1:28 PM	1:44 PM	0:11	1:55 PM	2:25 PM	1:30	0:33	2:03
2:23 PM	3:10 PM	0:46	3:56 PM	4:12 PM	0:03	4:15 PM	4:45 PM	1:33	0:49	2:22
6:21 PM	7:08 PM	0:07	7:15 PM	7:29 PM	0:06	7:35 PM	8:05 PM	1:31	0:13	1:44
Average		0:31			0:06			1:30	0:37	2:08

Blue = Metrolink

Table 15 Comparison of Transit Routes from Irvine to LAX

Item	Metrolink/Amtrak -> FlyAway® -> APM		Metrolink -> NTS -> C Line -> APM	
	Weekday	Weekend	Weekday	Weekend
Average Trip Time (Hours: Minutes)	1:48	1:52	1:47	2:08
Shortest Trip Time (Hours: Minutes)	1:41	1:41	1:43	1:44
Longest Trip Time (Hours: Minutes)	2:10	2:12	2:03	2:24
Number of Trains	24	15	13	4
Average Frequency of Trains (Hours: Minutes)	0:43	1:08	1:15	3:00
Percentage of Trips < 2:00	96%	67%	85%	25%
Percentage of Trips < 2:00 and < 2:30	4%	33%	15%	75%
Percentage of Trips > 2:30 and < 3:00	0%	0%	0%	0%
Percentage of Trips > 3:00	0%	0%	0%	0%
Earliest Departure from Irvine	5:12 AM	5:49 AM	5:12 AM	9:21 AM
Earliest Arrival at LAX	7:03 AM	7:33 AM	6:55 AM	11:45 AM
Latest Departure from Irvine	9:49 PM	9:49 PM	8:12 PM	6:21 PM
Latest Arrival at LAX	11:33 PM	11:33 PM	10:15 PM	8:05 PM

Note: APM replaces LAX Shuttle in mid-2026

Source: Metrolink, Amtrak, LA Metro, Norwalk Transit System, and FlyAway® published schedules

Table 16 Comparison of Transit Routes from LAX to Irvine

Item	APM -> FlyAway® -> Metrolink/Amtrak		APM -> C Line -> NTS -> Metrolink	
	Weekday	Weekend	Weekday	Weekend
Average Trip Time (Hours: Minutes)	2:15	2:26	2:30	3:05
Shortest Trip Time (Hours: Minutes)	1:52	1:49	1:48	1:56
Longest Trip Time (Hours: Minutes)	3:08	3:32	4:38	4:59
Number of Trains	25	16	13	4
Average Frequency of Trains (Hours: Minutes)	0:41	1:04	1:20	2:35
Percentage of Trips < 2:00	6%	12%	15%	17%
Percentage of Trips < 2:00 and < 2:30	69%	42%	68%	39%
Percentage of Trips > 2:30 and < 3:00	16%	27%	12%	33%
Percentage of Trips > 3:00	9%	18%	6%	11%
Earliest Departure from LAX	5:40 AM	5:40 AM	4:40 AM	7:50 AM
Earliest Arrival at Irvine	7:48 AM	8:12 AM	6:48 AM	9:49 AM
Latest Departure from LAX	9:10 PM	9:10 PM	9:00 PM	3:40 PM
Latest Arrival at Irvine	11:12 PM	11:12 PM	10:48 PM	5:36 PM

Note: APM replaces LAX Shuttle in mid-2026

Source: Metrolink, Amtrak, LA Metro, Norwalk Transit System, and FlyAway® published schedules



Wildfires Hit Home



Orange County Grand Jury 2025-2026

TABLE OF CONTENTS

SUMMARY	5
BACKGROUND	6
REASON FOR STUDY	9
METHOD OF STUDY.....	9
INVESTIGATION AND ANALYSIS	10
FINDINGS	31
RECOMMENDATIONS	32
COMMENDATIONS	33
REQUIRED RESPONSES	34
Acronyms	41
Glossary	43
Bibliography	45
Appendix A	50
Appendix B.....	53
Appendix C.....	55
Appendix D.....	56
Appendix E.....	58
Appendix F	61
Appendix G	63

FIGURES

Figure 1 Map of Eaton and Palisades Fires in January 2025	7
Figure 2 Shared responsibility for risk reduction in wildland-urban interface areas	11
Figure 3 WUI and suburban conflagration fire disaster chain of events.	13
Figure 4 Example of an Orange County City LRA Fire Hazard Severity Zone Map	16
Figure 5 Board of Forestry and Fire Protection Defensible Zones 0, 1, and 2.....	18
Figure 6 Total FAIR Plan Dwelling and Commercial Policies Have Increased, September 2023 to September 2025	20
Figure 7 City Area Reported in Fire Hazard Severity Zones.....	26
Figure 8 Cities Reporting Achieved, Applied for, or Plan to Apply for a Community- Level Wildfire Risk Mitigation Designation	27

Figure 9	Cities Reporting Outreach Program to Provide Information and Guidance to Property Owners on Wildfire Risk Mitigation Measures and/or Grants	28
Figure 10	Cities Reporting Their Outreach Program Refers to Orange County Fire Authority Outreach Programs and Resources	29
Figure 11	Top 20 Deadliest California Wildfires	50
Figure 12	Top 20 Most Destructive California Wildfires	51
Figure 13	Large Fires 300 Acres and Greater - State and Contract Counties Direct Protection Area	52
Figure 14	Orange County Wildfires by Size	52
Figure 15	Safer from Wildfires Flyer, Page 1	53
Figure 16	Safer from Wildfires Flyer, Page 2	54
Figure 17	Fire Hazard Severity Zone Map of Orange County	55
Figure 18	Fire Hardening and Defensible Space Disclosure, Page 1	56
Figure 19	Fire Hardening and Defensible Space Disclosure, Page 2	57
Figure 20	California Property and Casualty Insurance Company Homeowners Premium and Loss	58
Figure 21	FAIR Plan Data for Orange County Zip Codes 90620 - 92679	59
Figure 22	FAIR Plan Data for Orange County Zip Codes 92680 – 92899	60
Figure 23	Orange County Fire Authority Covered Cities	61
Figure 24	Orange County Fire Jurisdictions	62
Figure 25	Ready, Set, Go! Flyer for Immediate Zone	63
Figure 26	Ready, Set, Go! Flyer on Defensible Space	64
Figure 27	Ready, Set, Go! Flyer for Home Hardening, Page 1	65
Figure 28	Ready, Set, Go! Flyer for Home Hardening, Page 2	66
Figure 29	Ready, Set, Go! Flyer on Vegetation Management	67
Figure 30	Ready, Set, Go! On Be Ember Aware	68
Figure 31	Ready, Set, Go! Flyer on Home Assessment	69
Figure 32	Ready, Set, Go! Flyer on Wildfire Home Risk Assessment, Page 1	70
Figure 33	Ready, Set, Go! Flyer on Wildfire Home Risk Assessment, Page 2	71
Figure 34	Zone 0 At-A-Glance, Page 1	72
Figure 35	Zone 0 At-A-Glance, Page 2	73

SUMMARY

Wildfires have become a fact of life in California. Persistent drought conditions and accelerated warming have led to an increase in wildfires throughout the state. Of the twenty most destructive wildfires in California history, fifteen have occurred in the last ten years (see Appendix A). From the Camp Fire, also referred to as the Paradise Fire, in Northern California to the Palisades and Eaton Fires in Los Angeles and the Airport Fire in Orange County, the tragic loss of life and the destruction of thousands of homes and structures have upended homeowners' lives and rocked the insurance industry with billions of dollars in claims just in the last few years. These conditions have made home insurance unaffordable or unavailable for many Orange County residents. The State of California has attempted over recent years to mitigate the impact on ratepayers and insurers and has provided tougher regulations for hardening homes and property. Both the California legislature and the California Department of Insurance have issued recent laws and regulations to address these issues. Significant for this report are Safer from Wildfires (2022), California Fair Access to Insurance Requirements (FAIR) Plan (1968, revised 2025), Assembly Bill 888 (2025) and California Wildland-Urban Interface Code (2025).

The California FAIR Plan was established in 1968 to provide basic insurance for property owners who could not obtain fire coverage through the traditional insurance market due to being in high-risk fire areas. The FAIR Plan is not a state agency, and it receives no taxpayer funding. It is a syndicated fire insurance pool made up of all insurers licensed to write property/casualty insurance in the state. The FAIR Plan is intended to be the insurer of last resort and is meant to be a temporary safety net helping property owners until they can transition back to the traditional insurance market. The numerous fires over the last few years coupled with private insurers leaving the California market or no longer insuring homes in high-risk areas, have resulted in the FAIR Plan being financially strained with the number of policies more than doubling since September 2023.¹ The State Legislature and Department of Insurance both responded with strategies to rebalance this problem requiring insurers to increase the number of policies issued in high-risk areas and to change the way rates are established, however, insurance companies, using loopholes in the legislation, have so far largely avoided meeting the goals set for them.²

The Safer from Wildfires regulation was issued by the Insurance Commissioner after development in partnership with California Department of Forestry and Fire Protection (CAL FIRE) and the Governor's Office of Emergency Services. The regulation mandates

¹ Key Statistics & Data. The California FAIR Plan. <https://www.cfpnet.com/key-statistics-data/>

² The New York Times, *California Promised Insurance Relief, But Delivered Loopholes*, Nov. 2, 2025.

that insurance companies provide rate discounts for various actions that property owners take to create defensible space and harden their homes against wildfires (see Appendix B).

AB888, the California Safe Homes Grant Program, aims to reduce wildfire losses, improve insurability and resilience of vulnerable communities, and support home hardening efforts to help residents qualify for insurance premium incentives. It provides grants to aid qualifying residents and communities to complete wildfire risk mitigation measures.

The California Wildland-Urban Interface Code (CWUIC) refers to the California Building Standards Code, Title 24, Part 7. Effective in January 2026, the CWUIC requires fire-resistant and ignition-resistant construction in Fire Hazard Severity Zones or the wildland-urban interface. Requirements were also established for vegetation and hazard mitigation in the same areas. Studies have definitively shown that implementing these home hardening and defensible space requirements, including retrofitting existing homes, will greatly reduce ignition and fire spread, thereby reducing damage and resulting claims. Compliance with the 2015 International Wildland-Urban Interface Code (IWUIC) could save \$4 for every \$1 invested and retrofitting structures to the IWUIC could provide from \$2 to as much as \$8 in benefits for each \$1 invested.³ Home hardening and defensible space measures that align with wildland-urban interface codes and Safer from Wildfires regulations will help save homeowners and insurance companies from catastrophic loss.

The 2025-2026 Orange County Grand Jury found evidence that clearly shows Safer from Wildfires home hardening and defensible space measures protect homes and communities, saving homeowners, local governments, and fire authorities as well as insurance companies from catastrophic loss while also providing discounts for homeowners' insurance premiums.

BACKGROUND

California's Wildfire Crisis and Insurance Impact

California faces an escalating wildfire crisis fueled by accelerated warming, prolonged droughts, increasingly windy conditions, and expanded development into fire-prone areas. Between 2015 and 2025, 15 of the 20 most destructive wildfires in state history

³ National Institute of Building Science, *Natural Hazard Mitigation Saves*. 2019. https://nibs.org/wp-content/uploads/2025/04/NIBS_MMC_MitigationSaves_2019-1.pdf. Accessed March 3, 2026.

occurred, including the Palisades and Eaton Fires in 2025. These events have caused loss of life, devastated communities, destroyed thousands of homes, and resulted in billions in insured losses (see Appendix A).

The Eaton Fire in January 2025, spread through the suburbs of Pasadena destroying 9,413 structures and burning 14,021 acres. It became Los Angeles County's most destructive and second deadliest fire with 19 fatalities (see Appendix A).

On the same day in January 2025, the Palisades Fires swept through Pacific Palisades, Topanga, and Malibu, consuming 6,833 homes and 23,707 acres. It became Los Angeles County's third-most destructive fire and third deadliest with 12 fatalities (see Appendix A). Both fires were fueled by strong Santa Ana winds of between 80-100 mph, extremely dry conditions, and dense vegetation, creating what officials called a "perfect storm" for wildfire spread.^{4,5}

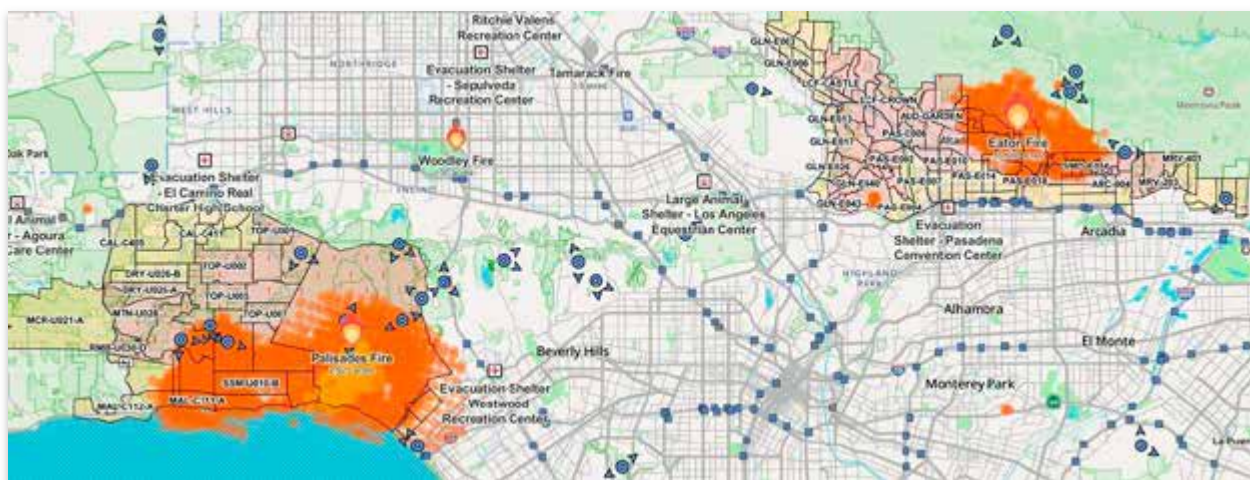


Figure 1 Map of Eaton and Palisades Fires in January 2025

The most destructive California wildfire listed by CAL FIRE is the November 2018 Camp Fire in Butte County which burned 153,336 acres, destroyed 18,804 structures, and resulted in 85 deaths. The CAL FIRE list of the Top 20 Most Destructive California Wildfires can be viewed in detail in Appendix A. Data for Orange County wildfires for the period 2008 through 2024 can be viewed in Appendix A.

Orange County's 2024 Airport Fire that started in Trabuco Canyon burned 23,500 acres and destroyed 160 structures. The fire raged for nearly a month, prompting a state of

⁴ Andrea Thompson, *How the Ferocious Santa Ana Winds are Fueling the Palisades Fire*, Scientific American, Accessed January 8, 2026, <http://www.scientificamerican.com>

⁵ Julia Jacobo and Ginger Zee, *A perfect storm of weather and climate conditions led to the severity of the California fires*, ABC News, Accessed January 8, 2026, <http://www.abcnews.com/US/perfect-storm-weather-climate-conditions-severity-california-fires/story?id=117468072>

emergency and millions of dollars in claims. This fire and others not only caused property loss, but also damaged ecosystems, water resources, and impacted air quality. Post-fire soil degradation and the expansion of invasive, non-native plants has further hindered recovery.⁶

In California, wildfires have strained the private insurance market. Many insurers, facing frequent and unsustainable financial exposure and constraints on rate hikes caused by Proposition 103 have withdrawn from high-risk areas, or stopped issuing new policies altogether. Some insurers have even withdrawn from the state completely.

California homeowners in high-risk wildfire areas report premiums ranging from \$5,000 to \$12,000 annually.⁷ Orange County, California's fifth most expensive housing market as of the 4th quarter 2025,⁸ faces challenges that are different than the statewide market. With an average home price of \$1.2 million,⁹ rising insurance costs further threaten housing affordability. A recent survey found that 43% of Orange County seniors worry most about housing costs and financial security.¹⁰ Among the hardest hit by insurance premium increases and policy nonrenewal are retirees, renters, and owners of condominiums, townhomes, and mobile homes.

The Safer from Wildfires regulation requires insurers to offer discounts to homeowners who take proactive steps to reduce wildfire risk. Discounts are based on both achieving community-level designations, which assess the collective mitigation efforts of neighborhoods, and property-level improvements such as installing fire-resistant roofing, ember-resistant vents, and clearing defensible space.¹¹

Reducing wildfire risk in the wildland-urban interface helps ensure that insurance coverage remains accessible. California's wildfire and insurance crisis demands coordinated action from local governments and fire authorities, communities, and homeowners to reduce risk of wildfire.

⁶ Mashall A. Hayrikian, *Engineering and Environmental Implications of the LA wildfires: Eaton and Palisades Fire*, Marshall Geoscience – Geotechnical Engineering, Laboratory Services, <http://www.marshallgeo.com/geotechnical-engineering/engineering-and-environmental-implications-of-la-wildfires-eaton-palisades-fires/>

⁷ Merlin Law Group. *Fire Insurance in California: A Complete Guide*. <https://www.merlinlawgroup.com/fire-insurance-california-guide/>. Accessed March 6, 2026.

⁸ California Association of Realtors®, *Median Prices of Existing Single Family Homes*. Accessed March 8, 2026. <https://www.car.org/marketdata/data/housingdata>

⁹ O.C. CA Real Estate and Property Data, ATTOM, October 2025

¹⁰ Gabriel San Roman, *New report on aging in Orange County outlines key concerns among seniors*, Los Angeles Times, June 21, 2024, <https://www.latimes.com/socal/daily-pilot/entertainment/story/2024-06-21/aging-in-orange-county-report>

¹¹ California Code of Regulations, Title 10, Section 2644.9, Consideration of Mitigation Factors; Wildfire Risk Models. <https://regulations.justia.com/states/california/title-10/chapter-5/subchapter-4-8/article-4/section-2644-9/>

REASON FOR STUDY

Wildfires have become an increasingly severe threat to residential communities in Orange County, particularly those in high-risk fire zones. The frequency and intensity of wildfires has escalated due to prolonged droughts, rising temperatures, and development encroachment into wildland-urban interface areas. Catastrophic losses from these wildfires have resulted in a continuing insurance crisis.

This study aims to (1) identify the shared responsibilities of local governments and fire service agencies, communities and homeowners to reduce the risk of wildfire in the wildland-urban interface, (2) investigate the status of actions taken by the California legislature and Department of Insurance to provide relief to policyholders, and (3) inform communities and homeowners on home hardening, defensible space, insurance risk reduction, and wildfire safety awareness.

METHOD OF STUDY

The investigation reviewed the efforts of Orange County local governments, local fire departments, and homeowner associations to better understand and provide an independent look at the above concerns and possible solutions. To achieve a clear picture of the wildfire problem in the Orange County wildland-urban interface and its impact on insurance rates, the 2025-2026 Grand Jury has done the following:

- Reviewed studies and academic papers
- Issued a Fire Hazard Severity Zone survey to all Orange County cities
- Examined the 2025 California Wildland-Urban Interface Code
- Observed a demonstration at a Yorba Linda Water District Heli-Hydrant™
- Visited Firewise USA Site designated communities
- Conducted literature review of previous statewide Grand Jury reports
- Interviewed California Department of Insurance staff, reviewed Department website and pertinent regulations
- Visited Orange County Fire Authority facilities to better understand their training, procedures, and preparedness
- Conducted multiple interviews with city, county, and fire officials, as well as homeowners association staff and residents regarding wildland-urban interface wildfire risk reduction



*Orange County Fire Authority helicopter approaching Yorba Linda Water District Heli-Hydrant™
Source: Orange County Grand Jury 2025-2026*

3

INVESTIGATION AND ANALYSIS

The 2025-2026 Grand Jury investigated the risk of wildfire in Orange County wildland-urban interface areas, the insurance industry's response to this risk, actions taken by fire prevention authorities to reduce the risk of damage and destruction of homes by wildfire, and the state legislature and California Department of Insurance (CDI) response to the insurance crisis. The Grand Jury also investigated actions homeowners should take to share the responsibility to reduce community wildfire risk, and by doing so, potentially reduce their insurance costs.

The Grand Jury investigation included evaluation of CDI initiatives, the Safer from Wildfires insurance regulation,¹² and other regulations related to wildfire and insurance risk reduction. The investigation also included examination of recent changes to Fire Hazard Severity Zone mapping, the 2025 CWUIC, and pending amendments to the ember-resistant Zone 0 regulations that comprise defensible space requirements.

Shared Responsibility for Reduction of Wildfire and Insurance Risk

There is a broad scope of shared responsibility for risk reduction in wildland-urban interface areas. State legislators, CDI, state and local fire prevention authorities, counties and cities, community-level organizations, and homeowners all share responsibility for taking actions necessary to prevent wildfires in wildland-urban interface areas and thereby reduce insurance risk and policy rates. Figure 2 below illustrates the shared responsibility.

¹² California Code of Regulations, Title 10, Section 2644.9



Figure 2 Shared responsibility for risk reduction in wildland-urban interface areas

The conclusion of this report focuses on the responsibilities of local governments and fire prevention authorities to provide homeowners the information and guidance needed to reduce property-level wildfire and insurance risk and thereby reduce these risks across entire communities.

Wildland-Urban Interface

Wildland-urban interface (WUI) is where urban development meets or intermixes with undeveloped natural areas. The term “wildland-urban interface” refers most often to areas where houses are located within or adjacent to relatively larger areas of natural vegetation. The U.S. Forest Service refers to WUI simply as “areas where human development meets natural landscapes.”¹³ WUI is at greatest risk of wildfire in



Source: RanchoMissionViejo.com

¹³ Forest Service, U.S. Department of Agriculture. Wildland-Urban Interface. <https://research.fs.usda.gov/nrs/fire/wui>. Accessed January 12, 2026.

California, where we have led the nation in both WUI growth and wildfires for 30 years.¹⁴

The Wildland-Urban Interface Fire Problem

The current National Fire Protection Association (NFPA) Firewise USA program was developed out of the 1986 Wildfire Strikes Home conference principally organized by the U.S. Forest Service and the NFPA. This initiative was the initial fire management response to the home destruction problem related to wildfires nationally recognized in 1985 which has since become known as the WUI fire problem.¹⁵

By the middle of this century, many Orange County residents may have a dramatic experience with wildfire due to increasingly drier, hotter conditions. Research that examined wildfires during the period from 1959 through 2009 predicts that in the next 25 years Southern California will see increased wildfires during months when fall winds occur and also during the warmer, summer months. It is estimated that by the mid-21st century there will be a 64% increase in acreage burned during higher intensity fall winds, and a 77% increase during summer winds due to warmer and drier climate. A greater concern is the estimated 20% increase in structures destroyed due to fires during fall winds and estimated 74% increase in structures destroyed due to fires during summer winds in warmer, drier conditions.¹⁶

Orange County development that continues into the WUI should expect to face these predictions. This Orange County Grand Jury report focuses on the implications for increased wildfire and insurance risk and our concern that most homes in WUI areas are not prepared to resist ignition and destruction by wildfire.

Wildland-Urban Interface Fire Disaster and Suburban Conflagration

WUI fire disasters and suburban conflagrations occur during extreme fire conditions when numerous houses ignite and burn simultaneously, overwhelming the capabilities of firefighting resources.¹⁷ If enough homes are ignition-resistant, many homes do not ignite during extreme fire conditions and fire protection is not overwhelmed by the

¹⁴ Center for Critical Urban and Environmental Studies. University of California, Santa Cruz. *Wildland Urban Interface (WUI) Research for Resilience: Addressing California's Climate, Conservation & Housing Crises*. <https://criticalurbanenvironments.ucsc.edu/projects/wildland-urban-interface-wui-research-for-resilience/>

¹⁵ Jack Cohen. *The Wildland-Urban Interface Fire Problem: A Consequence of the Fire Exclusion Paradigm*. Forest History Today. Fall 2008: 20-26. https://www.fs.usda.gov/rm/pubs_other/rmrs_2008_cohen_j002.pdf. Accessed March 25, 2026.

¹⁶ Yufang Jin, et al. *Identification of two distinct fire regimes in Southern California; implications for economic impact and future change*. Environmental Research Letters, Volume 1, Number 9. IOP Science, September 8, 2015. <https://iopscience.iop.org/article/10.1088/1748-9326/10/9/094005>. Accessed January 9, 2026.

¹⁷ Cohen, *The Wildland-Urban Interface Fire Problem*, 22.

homes that do ignite; the ignition-resistant homes can survive without firefighter protection, and an extreme wildfire can occur without becoming a WUI fire disaster¹⁸ or suburban conflagration.

Suburban conflagrations occur when fire spreads from the wildlands into the WUI and suburban environment. Suburban conflagration follows the conceptual WUI fire chain of events in Figure 3.¹⁹ Once a structure in a community ignites, the probability of its complete destruction is high and the risk to the rest of the community increases as the burning structure produces significant heat and embers.²⁰ Effective prevention of structure ignitions through home hardening and defensible space measures can break the WUI fire chain of events.



Figure 3 WUI and suburban conflagration fire disaster chain of events.²¹

Home Ignition Zone and Home Ignition Potential

The home ignition zone refers to a home and its immediate surroundings within 100 to 200 feet. The home ignition zone principally determines the potential for WUI fire disasters. Research shows that a home's ignition potential during extreme wildfires is determined by the characteristics of its exterior materials and design, their response to

¹⁸ Cohen, *The Wildland-Urban Interface Fire Problem*, 23.

¹⁹ Ian M. Gammanco, et al. *The Return of Conflagration in Our Built Environment*. Insurance Institute for Business and Home Safety. September 2023. https://ibhs.org/wp-content/uploads/Suburban_Wildfire_Conflagration_WhitePaper.pdf. Accessed March 20, 2026.

²⁰ Gammanco, *The Return of Conflagration*, 22.

²¹ Gammanco, *The Return of Conflagration*, 14.

burning objects within 100 feet, and their response to embers. Most destroyed homes in residential areas ignite from smaller flames and firebrands (lofted embers), not surrounding vegetation.²² Reducing home ignition potential is the key to preventing WUI fire disaster.

Reducing Home Ignition Potential Can Prevent Wildland-Urban Interface Fire Disaster and Suburban Conflagration

During extreme WUI fires, homes ignite and burn and sustain the requirements for combustion both indirectly and directly: Indirectly from radiation and convection heating from flames, and directly from ember spot ignitions on a house. Computational modeling and laboratory and field experiments show that large flames of burning shrubs and tree canopies must be within 100 feet to ignite a home's wood exterior, while most destroyed homes ignite from smaller flames and directly from burning embers.²³ These research results suggest that addressing the conditions in the home ignition zone to significantly reduce home ignition potential can prevent WUI fire disaster. Reducing home ignition potential means addressing the ignitability of the structure rather than the immediate surroundings.



Source: Patrick T. Fallon / Agence France-Presse / Getty Images

An analysis of CAL FIRE data and Butte County property records shows that about 51% of the 350 single-family homes built after 2008 in the path of the Camp Fire were undamaged. By contrast, only 18% of the 12,100 homes built prior to 2008 escaped damage.²⁴ The homes built after 2008 were required to conform to 2008 Title 24, Chapter 7A of the California Building Standards Code which focused on construction of new buildings located within WUI and Fire Hazard Severity Zones. These 2008 wildfire risk mitigation requirements for new homes included materials such as fire-resistant

²² Cohen, *The Wildland-Urban Interface Fire Problem*, 23.

²³ Cohen, *The Wildland-Urban Interface Fire Problem*, 24.

²⁴ Dale Kasler and Phillip Reese. *In Camp Fire, Newer Houses Were Much Less Damaged*. The Sacramento Bee. April 11, 2019, updated January 9, 2024. <https://www.kqed.org/science/1940012/newer-%D8%8Cuses-much-less-damaged-in-camp-fire>. Accessed March 4, 2026.

roofs and siding, and construction methods for exterior wildfire protection. These wildfire risk mitigation requirements for new construction directly reduce home ignition potential and help homes constructed to the new standards survive undamaged.

Benefits of Reducing Home Ignition Potential Can Exceed Costs

The benefits of reducing home ignition potential through compliance with new construction requirements can exceed costs, with 90% of the benefits estimated from reduced property losses and insurance costs. The benefit-cost ratio (BCR) for complying with the 2015 International Wildland-Urban Interface Code (IWUIC) has been calculated by the National Institute of Building Science for a number of representative counties with moderate to extreme fire risk. Total benefits were calculated at \$3 billion and total costs at \$800 million, suggesting a BCR of approximately 4:1 or \$4 saved for every \$1 of additional construction and maintenance cost.²⁵

A national average BCR for retrofitting typical 2,000 square-foot existing homes plus nearby non-residential buildings (stores, schools, etc.) to 2018 IWUIC ignition-resistant construction and defensible space was also calculated. Benefits of retrofit exceed costs, with 93% of the benefits estimated from reduced property losses. Total benefits were calculated at \$430 billion and total costs at \$240 billion, equivalent to a national average BCR of 2:1 or \$2 saved for every \$1 of retrofit and maintenance costs.²⁶ The per-house retrofit cost is highly uncertain. The lowest average per-house retrofit cost would imply a much higher benefit-cost ratio, perhaps as high as 8:1, equivalent to an average of \$8 saved for every \$1 of retrofit cost.²⁷

Office of the State Fire Marshal Fire Hazard Severity Zone Mapping

California laws now require Fire Hazard Severity Zone (FHSZ) mapping.^{28,29,30} The need for FHSZ mapping arose from repeated occurrence of major destructive fires. The FHSZ maps are developed using a science-based and field-tested model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior. There are three levels of hazard score: Moderate, High, and Very High. Many factors are

²⁵ National Institute of Building Science, *Natural Hazard Mitigation Saves*. 63

²⁶ National Institute of Building Science, *Natural Hazard Mitigation Saves*, 114.

²⁷ National Institute of Building Science, *Natural Hazard Mitigation Saves*, 115.

²⁸ California Public Resources Code 4201-4204. <https://law.justia.com/codes/california/code-prc/division-4/part-2/chapter-1/article-9/>

²⁹ California Government Code 51175-89. <https://law.justia.com/codes/california/code-gov/title-5/division-1/part-1/chapter-6-8/section-51175/>

³⁰ California Code of Regulations Title 14, Section 1280. <https://regulations.justia.com/states/california/title-14/division-1-5/chapter-7/subchapter-3/article-1/section-1280/>

considered such as fire history, existing and potential fuel (natural vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for the area. FHSZ maps evaluate hazard, not risk. “Hazard” is based on the physical conditions that create a likelihood and expected fire behavior over a 30- to 50-year period without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts. “Risk” is the potential damage that a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.³¹

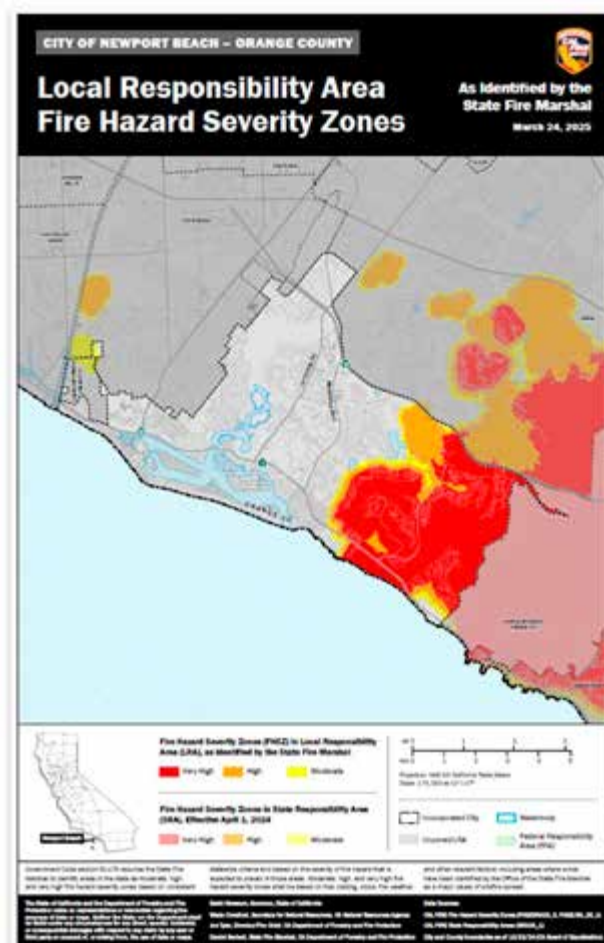


Figure 4 Example of an Orange County City LRA Fire Hazard Severity Zone Map

FHSZ mapping began with the State Responsibility Area (SRA), defined as a designated area in California where the state has primary responsibility for fire prevention and suppression. The SRA FHSZ mapping went into effect in April 2024. Since then, the Office has also been mapping Local Responsibility Areas (LRA), defined as a portion of land where local agencies, such as city or county fire departments, are responsible for wildfire protection. All Orange County FHSZ maps are accessible at the CAL FIRE website.³² Figure 4 shows an example of an Orange County city FHSZ map. Appendix C shows a screenshot of Orange County FHSZs using the CAL FIRE Find Your Fire Hazard Severity Zone viewer accessible at this CAL FIRE web address:³³

³¹ CAL FIRE. Office of the State Fire Marshal. Fire Hazard Severity Zones. Explore Fire Hazard Severity Zones. . <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed March 20, 2026.

³² CAL FIRE. Office of the State Fire Marshal. Fire Hazard Severity Zones in Local Responsibility Area. Phase 4. Orange County. <https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/folder/312669458215>. Accessed March 12, 2026.

³³ CAL FIRE. Office of the State Fire Marshal. Fire Hazard Severity Zones. <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>. Accessed March 12, 2026.

<https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9>.

Homeowners can enter their address in this viewer to find whether their property is located within a specific FHSZ.

How Fire Hazard Severity Zone Maps Impact Homeowners

FHSZ maps have no direct impact on insurance coverage. The CDI states that the FHSZ maps are intended to drive local planning decisions, not insurance decisions, and that FHSZ maps have nothing to do with insurance rating.³⁴

Though not used directly for insurance rating, FHSZ mapping does have significant indirect impacts. Properties located in High or Very High FHSZs are subject to certain legal requirements. New state building code requirements effective January 2026 for homes within a FHSZ or a WUI area include fire-resistant materials and construction methods. Buildings in these areas are subject to defensible space requirements. If you sell a home located in these areas, you are required to disclose fire risk and compliance to potential buyers using a specific form.

These regulations are in place to increase fire-resistance of communities and ensure property owners are aware of the risks involved in living in a wildfire-prone area.

California Wildland-Urban Interface Code Effective January 1, 2026

Title 24, Part 7 of the California Building Standards Code, also referred to as the 2025 California Wildland-Urban Interface Code (CWUIC),³⁵ became effective January 1, 2026.

Title 24, Part 7, Chapter 5, Special Building Construction Regulations establishes minimum standards to locate, design and construct buildings and structures or portions thereof for the protection of life and property, to resist damage from wildfires, and to mitigate building and structure fires from spreading to wildland fuels.³⁶ Chapter 5 requirements for construction within a FHSZ or a WUI area include:

- Specifications for fire-resistance-rated construction and non-combustible materials
- Ignition-resistant construction and material
- Replacement or repair of roof coverings

³⁴ California Department of Insurance. CAL FIRE Hazard Maps Do Not Affect Insurance Rates or Availability. <https://www.insurance.ca.gov/0400-news/0102-alerts/2025/CAL-FIRE-hazard-maps-do-not-affect-insu.cfm>. Accessed March 6, 2026.

³⁵ 2025 California Wildland-Urban Interface Code, Title 24, Part 7, 2024 IWUIC Amended, Effective Date: Jan 01, 2026. <https://codes.iccsafe.org/content/CAWUIC2025P2>. Accessed January 22, 2026.

³⁶ 2025 California Wildland-Urban Interface Code, Title 24, Part 7, 2024 IWUIC Amended, Effective Date: Jan 01, 2026. <https://codes.iccsafe.org/content/CAWUIC2025P2>. Accessed January 22, 2026.

Defensible Space Requirements and the New Ember-Resistant Zone 0

The State Board of Forestry and Fire Protection is responsible for the existing defensible space regulations³⁷ for buildings or structures located in the SRA or in Very High FHSZ in the LRA. If you have a home or building in the SRA or in the Very High FHSZ in the LRA, you are responsible for ensuring that your property complies with defensible space requirements to protect structures from wildfire. The Board of Forestry and Fire Protection webpages include an illustration of existing Defensible Space Zones 0, 1, and 2 (Figure 5), and links to Zones 0, 1, and 2 resources.³⁸



Figure 5 Board of Forestry and Fire Protection Defensible Zones 0, 1, and 2

It is important to note that “ember-resistant Zone 0” does not mean all vegetation, including trees, within 0-5 feet must be removed. New ember-resistant Zone 0

³⁷ California Public Resources Code Division 4 - Forests, Forestry and Range and Forage Lands Part 2 - Protection of Forest, Range and Forage Lands Chapter 3 - Mountainous, Forest-, Brush- and Grass-Covered Lands Section 4291. <https://law.justia.com/codes/california/code-prc/division-4/part-2/chapter-3/section-4291/>. Accessed January 14, 2026.

³⁸ State of California Board of Forestry and Fire Protection. <https://bof.fire.ca.gov/projects-and-programs/defensible-space-zones-0-1-and-2>. Accessed January 14, 2026.

vegetation options will be finalized later in 2026. The next public workshop meeting is scheduled for April 23, 2026. New ember-resistant Zone 0 requirements enhance existing defensible space requirements in High and Very High FHSZs in the LRA to create an ember-resistant zone within 0 to 5 feet of a building.³⁹ Compliance with existing or enhanced defensible space requirements addresses home ignition potential and reduces home ignitability. Reducing the ignitability of enough homes can break the WUI fire chain of events and help more homes escape destruction or survive undamaged.

AB38 Defensible Space Compliance Documentation and Disclosure

AB38 became effective in 2021, requiring sellers of property located in a High or Very High FHSZ to provide buyers with documentation stating the property complies with state defensible space requirements or local vegetation management ordinances, as applicable. The law provides that if documentation demonstrating compliance cannot be obtained by the close of escrow, a written agreement may be executed showing that the buyer agrees to obtain documentation of compliance within one year of the close of escrow.⁴⁰

The law also requires a Defensible Space Disclosure be provided by sellers of property located in a High or Very High FHSZ to buyers of homes constructed before January 1, 2010. The Disclosure must include specified information and a copy of a final inspection report, or information on where the report may be obtained. A sample Defensible Space Disclosure notice is reproduced at Appendix D.

California Homeowners Insurance Crisis

Devastating property losses and casualties resulting from numerous wildfires in California WUI areas and other natural disasters beginning in 2018 have precipitated a continuing homeowners insurance crisis. Beginning in 2022 and 2023, insurers began dramatically raising California homeowners fire insurance premiums in what were considered wildfire risk areas, and some insurers began to stop issuing policies in high-risk areas or withdraw from the California homeowners' insurance market altogether. Like many homeowners throughout the state that are severely impacted by the insurance crisis, many Orange County homeowners are also impacted.

³⁹ Board of Forestry and Fire Protection. Summary of October 2025 Draft Zone 0 Regulation Language. <https://34c031f8-c9fd-4018-8c5a-4159cdf6b0d-cdn-endpoint.azureedge.net/-/media/bof-website/projects-and-programs/defensible-space-zones-0-1-2/october-zone-0-summary-and-rule-plead.pdf?rev=927f9551dc7b4f15b8263671cca15ef2&hash=F80F2C5451370BB3C855E38CCCC516D4>. Accessed February 17, 2025.

⁴⁰ Assembly Bill 38, Wood. Fire safety: low-cost retrofits: regional capacity review: wildfire mitigation. Approved October 2, 2019. [California-2019-AB38-Chaptered](#)

Actions have been taken by the state legislature and the CDI during the last three years to strengthen the property insurance market, increase insurer commitments to write more policies in wildfire-distressed areas, and provide a framework to support homeowners in securing premium reductions from insurers when they take specific actions to reduce their community- and property-level wildfire risk.⁴¹ Despite these actions, many homeowners remain vulnerable to dramatic policy premium increases, nonrenewal, or the inability to secure traditional insurance coverage.

A recent New York Times article⁴² cites a 2023 California Association of Realtors survey wherein “nearly 7 percent of realtors surveyed...said that they had deals fall out of escrow that year because buyers couldn’t find adequate, affordable coverage.” As further cited in the article: “The percentage of realtors reporting that they had deals fall through for lack of insurance has more than doubled since 2023, to 16.6 percent.”

Unabated Growth of the California FAIR Plan

The continuing statewide insurance crisis is further demonstrated by the unabated growth in California FAIR Plan residential insurance policies. The FAIR Plan provides



Figure 6 Total FAIR Plan Dwelling and Commercial Policies Have Increased, September 2023 to September 2025

basic fire insurance coverage for eligible high-risk properties when such coverage is demonstrated by the applicant to be unavailable in the traditional insurance market.⁴³ FAIR Plan coverage is limited, relatively expensive, and is the insurer of last resort for these properties. During the period from September 2023 to September 2025, the number of FAIR Plan residential dwelling policies in force (PIF) increased from 320,581 to 625,033 as shown at

⁴¹ California Department of Insurance. Sustainable Insurance Strategy. <https://ains.assembly.ca.gov/system/files/2023-12/insurance-commissioner-ricardo-lara-california-sustainable-insurance-strategy-presentation-to-assembly-insurance-committee-12-13-2023.pdf>. Accessed January 29, 2026.

⁴² New York Times. *California Promised Insurance Relief, But Delivered Loopholes*. November 1, 2025. <https://www.nytimes.com/2025/11/01/us/los-angeles-california-fire-insurance-regulations.html>. Accessed March 25, 2026.

⁴³ The California FAIR Plan. <https://www.cfpnet.com/>. Accessed March 25, 2026.

Figure 6.⁴⁴ FAIR Plan data for Orange County residential policies in 2022 is shown in Appendix E.

The FAIR Plan is a syndicated fire insurance pool comprised of all insurers licensed to conduct property and casualty business in California. The FAIR Plan was established by statute⁴⁵ in August 1968 as an insurance placement facility and all licensed property/casualty insurers that write basic property insurance are required to be members of the FAIR Plan. The FAIR Plan issues policies on behalf of its member companies, and each member company participates in the profits, losses, and expenses of the FAIR Plan in direct proportion to its market share of business written in the state. The FAIR Plan is not a state agency or public entity; it does not receive public or taxpayer funding. As the total number of FAIR Plan policies continues to grow unabated, so does the financial strain on the overall FAIR Plan fire insurance pool.

Insurance Relief for Homeowners: Safer from Wildfires Insurance Regulation

The first of the wildfire safety regulatory incentives was the Safer from Wildfires regulation enacted in fall 2022.⁴⁶ Safer from Wildfires requires insurers to offer premium discounts based, in part, on mandatory factors including community-level wildfire risk mitigation designations and property-level wildfire risk mitigation efforts. Every action taken under Safer from Wildfires qualifies applicants and policyholders for insurance discounts.

Safer from Wildfires: Community-Level Wildfire Risk Mitigation

There are two examples of community-level wildfire risk mitigation designations listed in the Safer from Wildfire regulation: 1) Fire Risk Reduction Community Listing⁴⁷ approved by the Board of Forestry and Fire Protection, and 2) Firewise USA Site Designation⁴⁸ approved by the National Fire Protection Association. Other examples of community-level wildfire risk mitigation designations include local Fire Safe Council supported by the California Fire Safe Council, Community Wildfire Protection Plan supported by the

⁴⁴ Key Statistics & Data. The California FAIR Plan. <https://www.cfpnet.com/key-statistics-data/>. Accessed March 25, 2026.

⁴⁵ California Insurance Code sections 10090 et seq. <https://law.justia.com/codes/california/code-ins/division-2/part-1/chapter-9/section-10090/>. Accessed April 21, 2026.

⁴⁶ California Code of Regulations, Title 10, Section 2644.9

⁴⁷ Fire Risk Reduction Community listed by the Board of Forestry and Fire Protection pursuant to Public Resources Code Section 4290.1. <https://bof.fire.ca.gov/projects-and-programs/fire-risk-reduction-community-list>. Accessed February 10, 2026.

⁴⁸ Firewise USA program managed by National Fire Protection Association (NFPA). <https://www.nfpa.org/Education-and-Research/Wildfire/Firewise-USA>. Accessed April 21, 2026.

U.S. Fire Administration, and the Wildfire Prepared Neighborhood™ Pilot Program⁴⁹ being launched by the Insurance Institute for Business & Home Safety (IBHS).

Safer from Wildfires: Property-Level Wildfire Risk Mitigation

Safer from Wildfires also requires insurers to offer premium discounts based, in part, on the reduced wildfire risk resulting from each and every property-level wildfire risk mitigation action. These individual property-level wildfire risk mitigation efforts include measures addressing the immediate surroundings of a building and building hardening. The IBHS offers homeowner guidance based on its research,⁵⁰ and a property-level Wildfire Prepared Home™ designation⁵¹ that recognizes mitigation measures addressing both immediate surroundings and home hardening.

Safer from Wildfires: Property-Level Measures Addressing Immediate Surroundings - Defensible Space

The following measures are specified in Safer from Wildfires to address the immediate surroundings of a building. Each of these actions qualifies for insurance discount:

- a. Clearing of vegetation and debris from under decks
- b. Clearing of vegetation, debris, mulch, stored combustible materials, and any and all movable combustible objects from the area within five (5) feet of the building
- c. Use of only noncombustible materials in any improvements to the property, including fences and gates situated within five (5) feet of the building
- d. Removal or absence of combustible structures, including sheds and other outbuildings, from the area within thirty (30) feet of the building or as much of such area as is under the control of the applicant or policyholder
- e. Whether the property upon which the building is situated complies with state or local defensible space requirements, as applicable

Safer from Wildfires: Property-Level Building Hardening Measures

The following building hardening measures are specified in Safer from Wildfires. Each of these actions qualifies for insurance discount:

- a. Class-A fire rated roof
- b. Enclosed eaves

⁴⁹ Institute for Business & Home Safety. Wildfire Prepared Neighborhood Pilot Program. <https://wildfireprepared.org/wildfire-prepared-neighborhood-pilot-program/>. Accessed March 19, 2026.

⁵⁰ IBHS Research. *Wildland Fire Embers and Flames: Home Mitigations That Matter*. April 2023. <https://ibhs1.wpenginepowered.com/wp-content/uploads/Home-Mitigations-that-Matter-FINAL.pdf>. Accessed February 10, 2026.

⁵¹ Institute for Business & Home Safety. Wildfire Prepared Home: Take Proven Steps to Reduce Your Risk. <https://wildfireprepared.org/>. Accessed March 19, 2026.

- c. Fire-resistant vents
- d. Multipane windows, including dual pane windows, or functional shutters, which when closed, cover the entire window and do not have openings
- e. At least six (6) inches of noncombustible vertical clearance at the bottom of the exterior surface of the building, measured from the ground up

Safer from Wildfires: Optional Factors

The Safer from Wildfires regulation also incorporates other optional factors that are substantially related to risk of wildfire loss. These optional factors may include, but are not limited to: fuel, slope, access, aspect, structural characteristics, wind, and other community-level or property-level mitigation efforts, or designations as recommended by a state or local fire safety agency or organization as reducing wildfire risk.

Reducing Wildfire and Insurance Risk: AB888 The California Safe Homes Grant Program

AB888 established the California Safe Homes Grant Program in October 2025 to be developed and administered by the Department of Insurance for the purpose of achieving the following goals:

- (1) Reducing local and statewide wildfire losses
- (2) Improving insurability and resilience of vulnerable communities
- (3) Home hardening of insurable properties to mitigate wildfire risk and enable consumers to get access to insurance premium incentives offered by insurance companies and in alignment with the department's rules.

Eligible California Safe Home Grant Program applicants include qualifying individuals and qualifying cities, counties, and special districts. For individuals, grant funds may be awarded if the following criteria are met:

- (1) The property of the applicant is covered by an admitted insurer or the California FAIR Plan
- (2) The property of the applicant is in a ZIP Code that overlaps with a High or Very High FHSZ.
- (3) The income of the applicant is no higher than the low-income limit for the county in which they reside

As of January 1, 2026, the Department of Insurance was developing the grant application portal and planned to begin accepting California Safe Homes Grant applications in spring 2026.⁵²

Our Shared Responsibilities

Orange County Fire Authority (OCFA)

OCFA serves all unincorporated areas of Orange County and its 23 Orange County member cities. The OCFA Board of Directors is made up of elected officials from the County and its member cities. The 11 Orange County cities that are not served by OCFA have their own city fire departments, i.e., their own fire service agencies having jurisdiction. The list of OCFA member cities and other Orange County fire service agencies is included at Appendix F.

OCFA education and outreach programs are comprehensive. Online materials and event scheduling is accessible at their website, and a staff of seven community education specialists and a community education supervisor are available to coordinate and attend events. The Wildfire Preparedness⁵³ webpages cover multiple topic areas including:

- Ready, Set, Go!
- Home Assessment
- Defensible Space Disclosure Inspection
- Pest Control (tree pests management)
- Immediate Zone
- FHSZ Maps
- Insurance
- Contractors (specializing in wildfire preparedness)

OCFA takes a systematic approach to mitigating risk through its Community Risk Reduction Department (formerly Fire Prevention). OCFA Community Risk Reduction (CRR) staff identifies community risks, collaborates with developers, agencies, and residents to build and maintain safe communities.⁵⁴ In addition to the extensive Wildland Preparedness webpages, the CRR department webpages include a section on Wildland & Vegetation with specific information for homeowners in wildland interface areas. The CRR department supports homeowners' risk reduction efforts by providing an online

⁵² CalMatters. California homeowners could qualify for grants for new roofs and fire safety. January 1, 2026. <https://calmatters.org/economy/2026/01/california-safe-homes-grants/>. Accessed February 17, 2026.

⁵³ Orange County Fire Authority. Wildfire Preparedness. <https://ocfa.org/ready-set-go/>. Accessed February 24, 2026.

⁵⁴ Orange County Fire Authority. About Us. Departments. <https://ocfa.org/about-us/departments/community-risk-reduction/>. Accessed February 24, 2026.

home assessment tool⁵⁵ that covers the basics of both home hardening and defensible space principles. The online assessment tool guides the homeowner through a series of questions and ends with the opportunity to receive an emailed report providing recommendations for fire mitigation strategies. Before beginning the online questionnaire, homeowners are given the option to request an in-person home assessment with an OCFA Fire Prevention Specialist.

Fire Hazard Severity Zone Survey Results - Local Governments and Fire Service Agencies

This investigation included a survey of Orange County cities to gather information about their efforts to reduce risk of wildfire in WUI areas and their outreach programs for homeowners. The Grand Jury invited 34 Orange County cities to respond to the survey and received 28 responses. Of these 28 responses, 20 were from various city departments, and eight were from city fire departments.

The Orange County cities that responded to the survey reported having from zero to 100% of their city land area within Moderate, High, or Very-High FHSZs. Reported land areas may not match each individual city's FHSZ map. A summary of the survey results for city area reported in FHSZs are shown at Figure 7:

⁵⁵ Orange County Fire Authority. Home Assessment Tool. <https://ocfa.org/ready-set-go/home-assessment/>. Accessed February 24, 2026.

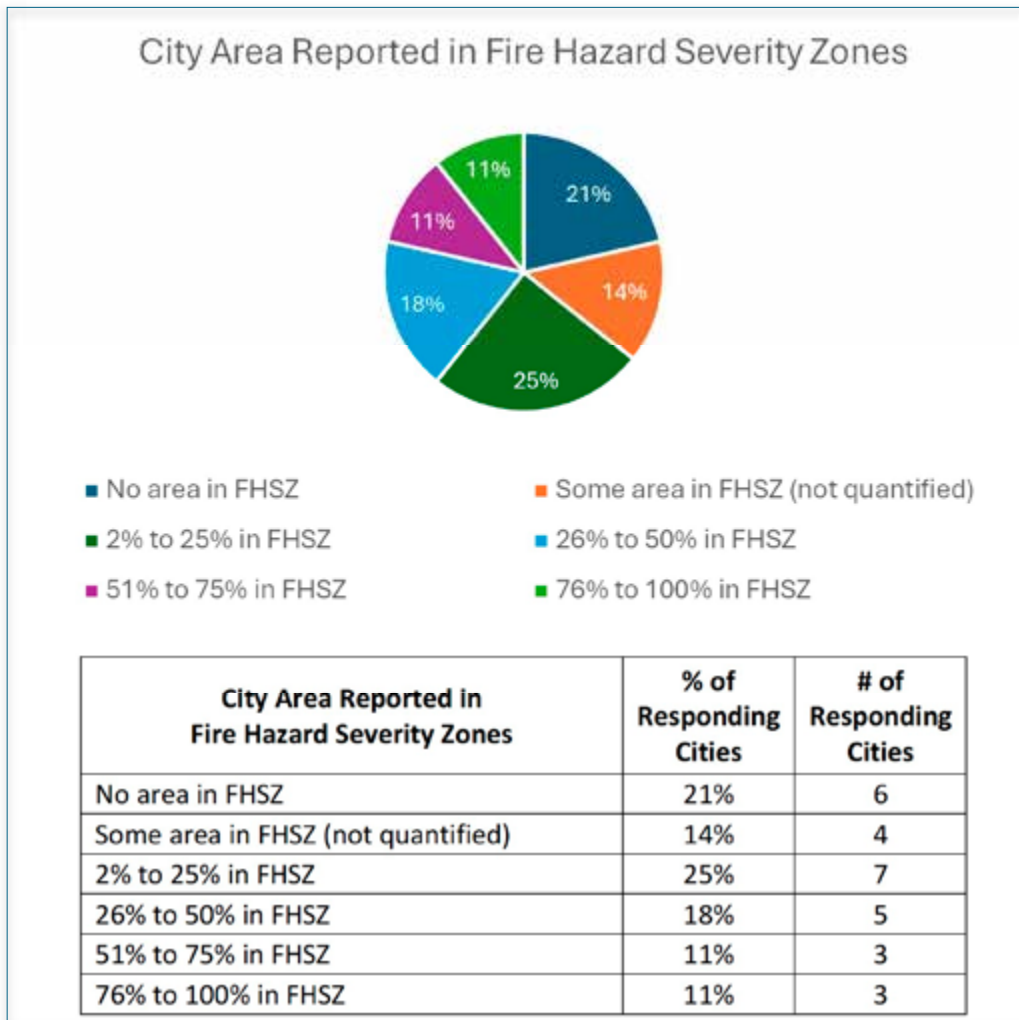


Figure 7 City Area Reported in Fire Hazard Severity Zones

11 of 28 responding cities reported having achieved or have applications pending approval for community-level wildfire risk mitigation designations. Achievement of community-level wildfire risk mitigation designations is a significant way local governments, local fire departments, unincorporated areas, and special districts can reduce wildfire and insurance risk for their residents. A summary of the survey results for cities that have achieved or applied for community-level wildfire risk mitigation designation are shown at Figure 8.

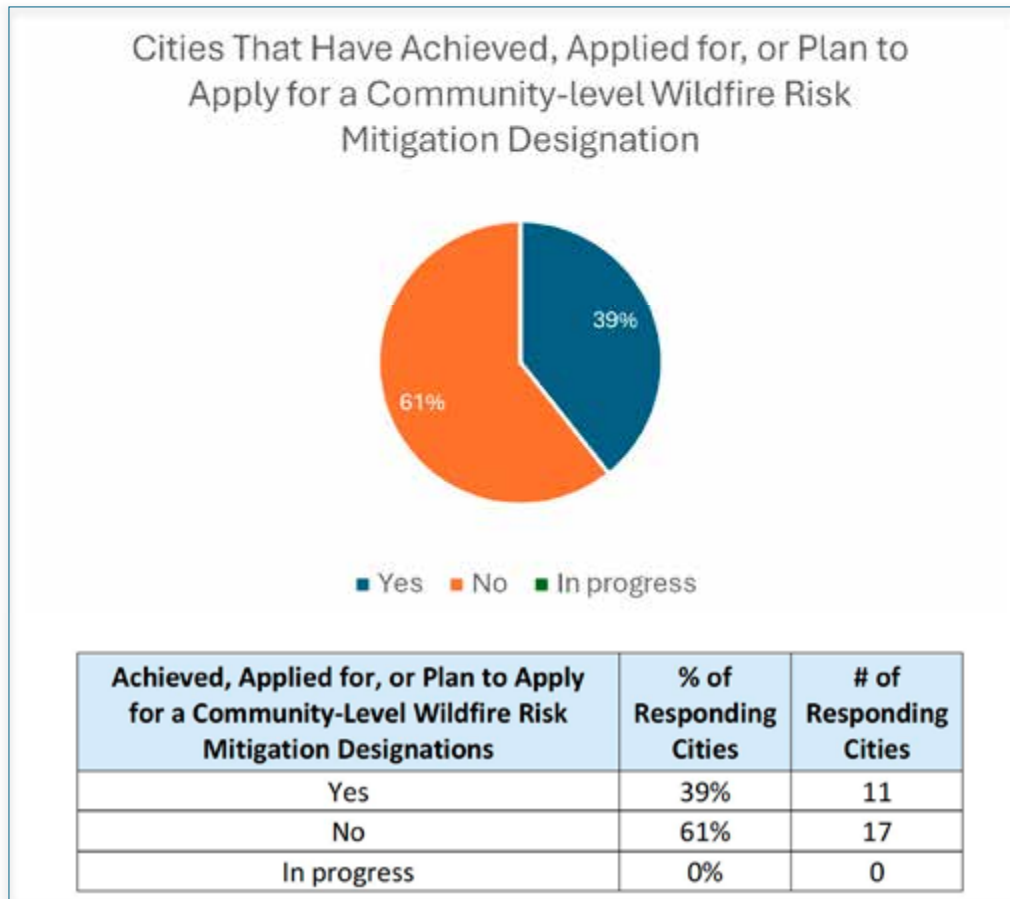
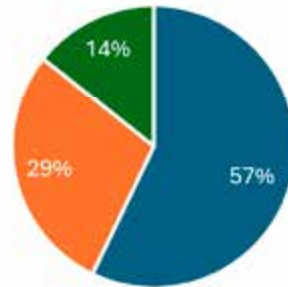


Figure 8 Cities Reporting Achieved, Applied for, or Plan to Apply for a Community-Level Wildfire Risk Mitigation Designation

16 of 28 responding cities reported having an outreach program that provides information and guidance to property owners on wildfire risk mitigation measures and grant programs. A summary of the survey results on cities reporting whether they have these outreach programs in place are shown at Figure 9. These outreach programs are needed to help homeowners achieve awareness and ability to plan and take actions required to reduce individual and community wildfire and insurance risk.

Cities That Have an Outreach Program to Provide Information and Guidance to Property Owners on Wildfire Risk Mitigation Measures and/or Grants



■ Yes ■ No ■ In progress

Outreach Program to Provide Information and Guidance to Property Owners on Wildfire Risk Mitigation Measures and Grants	% of Responding Cities	# of Responding Cities
Yes	57%	16
No	29%	8
In progress	14%	4

Figure 9 Cities Reporting Outreach Program to Provide Information and Guidance to Property Owners on Wildfire Risk Mitigation Measures and/or Grants

11 of the 16 cities reported having their own outreach programs, are Orange County Fire Authority (OCFA) member cities, and referred to one or more of OCFA's comprehensive programs and resources (see Figure 10). While OCFA member cities' use of OCFA outreach programs and resources is efficient and beneficial to their residents, the availability of a direct local contact at the city who is knowledgeable and can provide even a minimum of information and guidance on wildfire mitigation resources would help remove barriers to homeowners' actions to reduce wildfire risk.

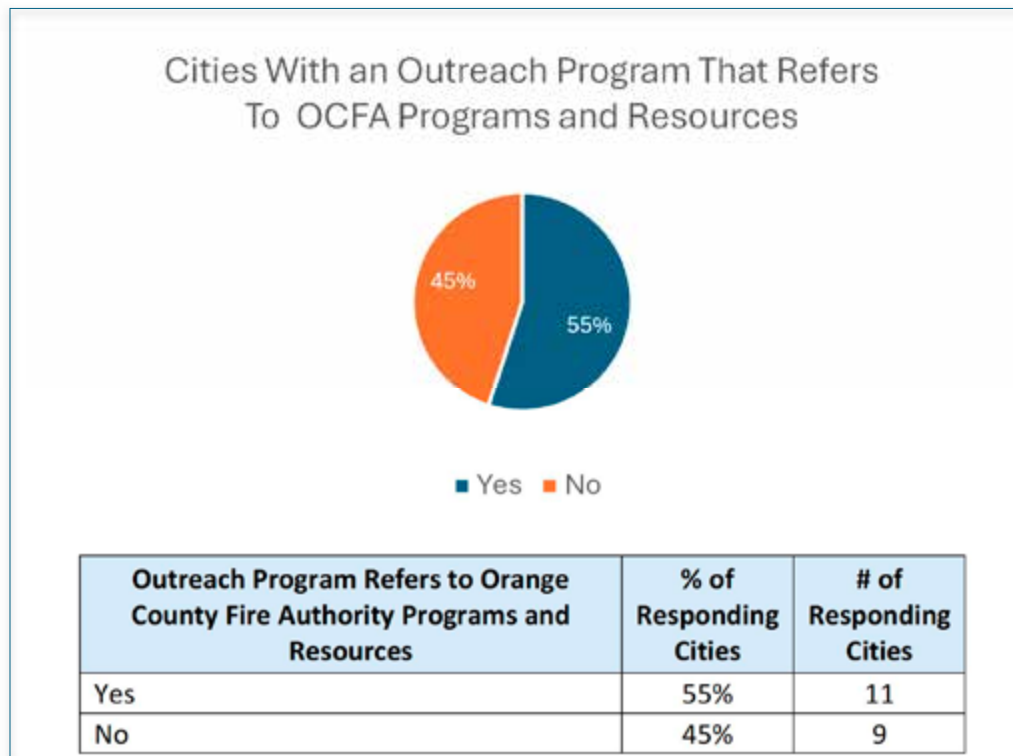


Figure 10 Cities Reporting Their Outreach Program Refers to Orange County Fire Authority Outreach Programs and Resources

Orange County Homeowners Associations Play an Important Role

According to the California Community Managers Association, there are 4,927 homeowners associations (HOA) in Orange County, and 82% of Orange County residents live in HOAs.⁵⁶ These HOAs communicate directly with their residents, and thus have the ability to mobilize people and resources to effectively achieve and maintain community-level wildfire risk mitigation designations and reduce their residents' homeowner insurance premiums.

HOAs are the local contact for their residents, and through their architectural and landscape standards can effectively communicate information on home hardening and defensible space requirements. HOAs often host community leaders and local fire service agencies for fire prevention workshops and other outreach events for HOA residents. Their local contact function can also provide information and organize opportunities to volunteer and support local fire prevention overall through activities such as Citizens Brigade⁵⁷ and Bike Brigade.⁵⁸ These HOA-hosted workshops, outreach

⁵⁶ California Association of Community Managers. Estimated number of residents living in HOAs based on average of 2010-2014 Census reports of 3.04 persons per household. www.cacm.org.

⁵⁷ *Weathered: After the LA Firestorm*. PBS, KCET, 2026.

⁵⁸ Ellis, Rebecca. Los Angeles Times. January 10, 2026. *Topanga Canyon felt abandoned. So residents are banding together to fight fire*. <https://www.latimes.com/california/story/2025-01-10/topanga-canyon-felt-abandoned-so-residents-are-banding-together-to-fight-fire>. Accessed March 6, 2026.

events, and local contact functions are effective means to help homeowners achieve awareness and ability to plan and take actions necessary to reduce wildfire and insurance risk.

HOAs often have significant responsibility for large open space areas of Orange County that can total hundreds of acres of fuel modification zones. The HOAs' collaborative role with local fire service agencies in managing these fuel modification zones is as important as their role with HOA residents in the shared responsibilities for wildfire and insurance risk reduction.

Homeowners are Responsible for Reducing Home Ignition Potential

Fire science research has demonstrated that ignition-resistant homes can survive wildfire without firefighter protection.⁵⁹ Where there are enough ignition-resistant homes, the WUI fire chain of events can be broken to prevent fire disasters, and these homes can escape destruction or survive undamaged. Taking the actions necessary to make homes ignition resistant to windborne embers is the responsibility of homeowners. The role of the homeowner is critical in the shared responsibilities for reducing wildfire and insurance risk in WUI areas.

Homeowners need support from local governments and fire service agencies to achieve the awareness and ability to plan and take actions necessary to make homes ignition resistant. This support is most effectively delivered through local outreach programs; effective communications in outreach programs have been found to be the more local, personalized efforts such as one-on-one consultation with fire experts, townhall events, small workshops, tours, and demonstrations.⁶⁰ For example, provision of in-person or online home assessments that result in written recommendations to homeowners for specific wildfire risk mitigation actions. Documentation of the recommended actions taken can then be presented to homeowners' insurers for the insurance discounts required by Safer from Wildfires.

Safer from Wildfires home hardening and defensible space measures protect homes and communities, save homeowners, local governments, and fire authorities as well as insurance companies from catastrophic loss while also providing discounts for homeowners' insurance premiums.

Reducing wildfire risk in the wildland-urban interface helps ensure that insurance coverage remains accessible. California's wildfire and insurance crisis demands coordinated action from local governments and fire authorities, communities, and homeowners to reduce risk of wildfire.

⁵⁹ Cohen, *The Wildland-Urban Interface Fire Problem*, 23.

⁶⁰ Gammanco, *The Return of Conflagration*, 34.

FINDINGS

In accordance with California Penal Code Sections 933 and 933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency affected by the findings presented in this section. The responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation “Wildfires Hit Home” the 2025-2026 Orange County Grand Jury has arrived at the following six findings:

- F1** More frequent and severe wildfires driven by increasingly hotter, drier, and windier conditions in the Orange County wildland-urban interface are escalating impacts on financial and non-financial resources. Among the financial costs are dramatic increases in homeowners’ insurance premiums, nonrenewals, and inability to obtain insurance.
- F2** Actions that address conditions in the home ignition zone to significantly reduce ignition potential can prevent a community wildland-urban interface fire disaster or suburban conflagration.
- F3** Expanded engagement with the community to raise awareness and provide support regarding home hardening and defensible space will increase effectiveness of wildfire risk mitigation and insurance risk reduction efforts.
- F4** Achievement of community-level and property-level wildfire risk mitigation designations (such as Firewise USA Site, Fire Risk Reduction Community or Insurance Institute for Business and Home Safety certification) lessens wildfire risk and helps reduce insurance premium costs.
- F5** All county residents should be made aware that Safer from Wildfire regulation requires insurers to provide discounts to homeowners and communities that implement home hardening and defensible space measures regardless of whether a property is located within a Fire Hazard Severity Zone.
- F6** AB888, California Safe Homes Grant Program, provides financial assistance to eligible homeowners, cities, counties, and special districts for home hardening and defensible space measures. Applying for and using these grant funds will reduce wildfire losses and improve insurability and resilience of vulnerable communities.

RECOMMENDATIONS

In accordance with California Penal Code Sections 933 and 933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency affected by the recommendations presented in this section. The responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury makes the following recommendations:

- R1** By December 31, 2026, the Orange County Board of Supervisors should plan to host a county-wide annual wildfire prevention fair for the County and all cities and fire service agencies, including Orange County Fire Authority, to showcase respective wildfire outreach programs, and for the first annual wildfire prevention fair to be scheduled no later than December 31, 2027. [F1, F2, F3, F4, F5, F6]
- R2** By December 31, 2026, cities and fire service agencies, including Orange County Fire Authority should commit to participation in a county-wide annual wildfire prevention fair planned by the Orange County Board of Supervisors to showcase wildfire prevention outreach programs. [F1, F2, F3, F4, F5, F6]
- R3** By December 31, 2026, cities, unincorporated areas, special districts, and fire service agencies in High and Very-High Fire Hazard Severity Zones should initiate planning activities to achieve community-level wildfire risk mitigation designations and/or establish a local Fire Safe Council within one year. [F4, F5, F6]
- R4** By December 31, 2026, to ensure city residents are engaged and aware of wildfire risk reduction resources, OCFA member and non-member cities should provide information, develop their own outreach program, and establish a direct contact person(s) for their residents. This is in addition to whatever referrals or references made to OCFA outreach programs. [F1, F2, F3, F4, F5, F6]

COMMENDATIONS

Yorba Linda Water District

The 2025-26 Orange County Grand Jury extends its special thanks to the Yorba Linda Water District (YLWD) for providing two tours of its facilities, including their non-portable Heli-Hydrants™. The YLWD with foresight and planning installed three Heli-Hydrant™

facilities. One of the tanks was the first to be installed in Southern California. These innovative tanks enable fire department helicopters to access water more quickly and efficiently, improving helicopter firefighting capabilities in areas where wildland vegetation and human development intersect, such as in the Yorba Linda service area.



Source: 2025-2026 Grand Jury

Newport Beach Fire Department

The 2025-2026 Orange County Grand Jury acknowledges and recognizes the Newport Beach Fire Department for their outstanding and continuing efforts to lead the Southern California region in dedication and adherence to the highest level of fire protection and safety. They are a role model for other cities in Orange County and elsewhere. In 2024, the Insurance Services Office honored Newport Beach Fire Department as a Top Tier Class 1 fire agency through its Public Protection Classification Program. Newport Beach Fire Department shares the Top Tier Class 1 designation with only about 1% of the top fire departments nationwide.

The Grand Jury particularly commends Newport Beach Fire Prevention leadership, who generously dedicated time and expertise to share insights from their extensive knowledge of fire science.

REQUIRED RESPONSES

California Penal Code Section 933 requires the governing body of any public agency which the Grand Jury has reviewed, and about which it has issued a final report, to comment to the Presiding Judge of the Superior Court on the findings and recommendations pertaining to matters under the control of the governing body. Such comment shall be made no later than 90 days after the Grand Jury publishes its report (filed with the Clerk of the Court). Additionally, in the case of a report containing findings and recommendations pertaining to a department or agency headed by an elected County official (e.g., District Attorney, Sheriff, etc.), such elected County official shall comment on the findings and recommendations pertaining to the matters under that elected official's control within 60 days to the Presiding Judge with an information copy sent to the Board of Supervisors.

The following excerpts from the California Penal Code provide the requirements for public agencies to respond to the Findings and Recommendations of this Grand Jury report:

§933

(c) No later than 90 days after the grand jury submits a final report on the operations of any public agency subject to its reviewing authority, the governing body of the public agency shall comment to the presiding judge of the superior court on the findings and recommendations pertaining to matters under the control of the governing body, and every elected county officer or agency head for which the grand jury has responsibility pursuant to Section 914.1 shall comment within 60 days to the presiding judge of the superior court, with an information copy sent to the board of supervisors, on the findings and recommendations pertaining to matters under the control of that county officer or agency head and any agency or agencies which that officer or agency head supervises or controls. In any city and county, the mayor shall also comment on the findings and recommendations. All of these comments and reports shall forthwith be submitted to the presiding judge of the superior court who impaneled the grand jury. A copy of all responses to grand jury reports shall be placed on file with the clerk of the public agency and the office of the county clerk, or the mayor when applicable, and shall remain on file in those offices. One copy shall be placed on file with the applicable grand jury final report by, and in the control of the currently impaneled grand jury, where it shall be maintained for a minimum of five years.

§933.05.

(a) For purposes of subdivision (b) of Section 933, as to each grand jury finding, the responding person or entity shall indicate one of the following:

- (1) The respondent agrees with the finding.*
- (2) The respondent disagrees wholly or partially with the finding, in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons, therefore.*
- (b) For purposes of subdivision (b) of Section 933, as to each grand jury recommendation, the responding person or entity shall report one of the following actions:*
- (1) The recommendation has been implemented, with a summary regarding the implemented action.*
- (2) The recommendation has not yet been implemented, but will be implemented in the future, with a timeframe for implementation.*
- (3) The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a timeframe for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of the public agency when applicable. This timeframe shall not exceed six months from the date of publication of the grand jury report.*
- (4) The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation, therefore.*
- (c) However, if a finding or recommendation of the grand jury addresses budgetary or personnel matters of a county agency or department headed by an elected officer, both the agency or department head and the board of supervisors shall respond if requested by the grand jury, but the response of the board of supervisors shall address only those budgetary or personnel matters over which it has some decision-making authority. The response of the elected agency or department head shall address all aspects of the findings or recommendations affecting his or her agency or department.*

The Orange County Grand Jury requires the following responses:

Orange County Board of Supervisors	90 Day Response Required
Findings:	F1, F2, F3, F4, F5, F6
Recommendations:	R1, R2, R3

Orange County Fire Authority Board of Directors	90 Day Response Required
Findings:	F1, F2, F3, F4, F5, F6
Recommendations:	R2, R3
City of Aliso Viejo	90 Day Response Required
Findings:	F1, F2, F3, F4, F5, F6
Recommendations:	R2, R3, R4
City of Anaheim	90 Day Response Required
Findings:	F1, F2, F3, F4, F5, F6
Recommendations:	R2, R3, R4
City of Brea	90 Day Response Required
Findings:	F1, F2, F3, F4, F5, F6
Recommendations:	R2, R3, R4
City of Buena Park	90 Day Response Required
Findings:	F1, F2, F3, F4, F5, F6
Recommendations:	R2, R3, R4
City of Costa Mesa	90 Day Response Requested
Findings:	F1, F2, F3, F4, F5, F6
Recommendations:	R2, R4
City of Cypress	90 Day Response Requested
Findings:	F1, F2, F3, F4, F5, F6
Recommendations:	R2, R4

City of Dana Point

Findings:

Recommendations:

90 Day Response Requested

F1, F2, F3, F4, F5, F6

R2, R4

City of Fountain Valley

Findings:

Recommendations:

90 Day Response Requested

F1, F2, F3, F4, F5, F6

R2, R4

City of Fullerton

Findings:

Recommendations:

90 Day Response Requested

F1, F2, F3, F4, F5, F6

R2, R4

City of Garden Grove

Findings:

Recommendations:

90 Day Response Requested

F1, F2, F3, F4, F5, F6

R2, R4

City of Huntington Beach

Findings:

Recommendations:

90 Day Response Requested

F1, F2, F3, F4, F5, F6

R2, R4

City of Irvine

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of La Habra

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of La Palma

Findings:

Recommendations:

90 Day Response Requested

F1, F2, F3, F4, F5, F6

R2, R4

City of Laguna Beach

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of Laguna Hills

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of Laguna Niguel

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of Laguna Woods

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of Lake Forest

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of Los Alamitos

Findings:

Recommendations:

90 Day Response Requested

F1, F2, F3, F4, F5, F6

R2, R4

City of Mission Viejo

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of Newport Beach

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of Orange

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of Placentia

Findings:

Recommendations:

90 Day Response Requested

F1, F2, F3, F4, F5, F6

R2, R4

City of Rancho Santa Margarita

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of San Clemente

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of San Juan Capistrano

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6

R2, R3, R4

City of Santa Ana
Findings:
Recommendations:

90 Day Response Required
F1, F2, F3, F4, F5, F6
R2, R3, R4

City of Seal Beach
Findings:
Recommendations:

90 Day Response Requested
F1, F2, F3, F4, F5, F6
R2, R4

City of Stanton
Findings:
Recommendations:

90 Day Response Requested
F1, F2, F3, F4, F5, F6
R2, R4

City of Tustin
Findings:
Recommendations:

90 Day Response Required
F1, F2, F3, F4, F5, F6
R2, R3, R4

City of Villa Park
Findings:
Recommendations:

90 Day Response Required
F1, F2, F3, F4, F5, F6
R2, R3, R4

City of Westminster
Findings:
Recommendations:

90 Day Response Requested
F1, F2, F3, F4, F5, F6
R2, R4

City of Yorba Linda
Findings:
Recommendations:

90 Day Response Required
F1, F2, F3, F4, F5, F6
R2, R3, R4

Acronyms

AB	Assembly Bill
B	Brush
BCR	Benefit Cost Ratio
CAL FIRE	California Department of Forestry and Fire Protection
CAL OES	California Governor's Office of Emergency Services
CC	Contract Counties
CDI	California Department of Insurance
CRR	Community Risk Reduction
CWUIC	California Wildland-Urban Interface Code
FAIR	Fair Access to Insurance Requirement
FEMA	Federal Emergency Management Agency
FHDS	Fire Hardening and Defensible Space
FHSZ	Fire Hazard Severity Zone
G	Grass
HOA	Homeowners Association
IBHS	Insurance Institute for Business & Home Safety®
IWUIC	International Wildland-Urban Interface Code
LRA	Local Responsibility Area
NFPA	National Fire Protection Association
OCFA	Orange County Fire Authority
P&C	Property and Casualty
PIF	Policies in Force
SB	Senate Bill
SRA	State Responsibility Area
USDA	United States Department of Agriculture

USFS	United States Forest Service
WRAP	Wildfire Risk Reduction and Asset Protection
WUI	Wildland-Urban Interface
YLWD	Yorba Linda Water District

Glossary

Aspect	Compass direction that a slope or terrain surface faces, influencing sunlight exposure, temperature, and vegetation.
Catastrophic loss	A sudden, severe, and often, widespread event resulting in extreme financial, loss of life, or permanent injury.
Class-A roof	Highest fire resistance classification for a roof assembly, signifying its effectiveness against severe fire exposure.
Conflagration	A particularly large and destructive fire; in the built environment, this may describe a fire that spreads via structure to structure.
Defensible space	Buffer zone created and managed between buildings and surrounding wildland area to protect buildings from embers, flames, or heat, slow or stop wildfire spread, and help ensure safety of firefighters.
Ember	Small piece of burning or glowing fragment from a fire.
Ember-resistant	Refers to features that reduce the risk of ignition from embers.
Ember spot ignition	Refers to one of the principal ways homes can ignite during extreme WUI fires, by embers directly on a house.
Firebrands	Refers to airborne embers; pieces of burning wood.
Firewise USA	Program administered by NFPA® and co-sponsored by the USDA Forest Service and the National Association of State Foresters.
Fuel modification zone	Designated area where vegetation is managed to reduce wildfire risk for protection of homes and communities.
Fuel reduction	Management of vegetation to reduce risk of wildfires.
Heli-Hydrant™	Patented rapid-fill water tank system for helicopter firefighting operations.
Home hardening	Utilizing building materials, construction methods and maintenance practices to increase resistance to ignition from fire exposure.
Home ignition potential	Susceptibility of a home and its immediate surroundings within 100 feet (thirty meters) to ignite during a wildfire.
Home ignition zone	A home and its immediate surroundings within 100 feet (thirty meters).

Ignition	Process leading to the onset of a sustained combustion reaction; “start of a fire.”
Ignition-resistant	Refers to materials and construction methods designed to resist ignition or sustained flaming combustion; difficult to catch fire when exposed to direct flame or heat.
Wildland fuels	Burnable plant materials that can act as fuel during wildfires, including grasses, shrubs, trees, dead leaves, and fallen pine needles.
Zone 0	Ember-resistant defensible space within the first five feet around a structure, required for properties in State Responsibility Area or Very High Fire Hazard Severity Zone in the Local Responsibility Area.

Bibliography

2025 California Wildland-Urban Interface Code, Title 24, Part 7, 2024 IWUIC Amended, Effective Date: Jan 01, 2026. Accessed January 22, 2026.

<https://codes.iccsafe.org/content/CAWUIC2025P2>.

2025 California Wildland-Urban Interface Code, Title 24, Part 7, 2024 IWUIC Amended, Effective Date: Jan 01, 2026. Accessed January 22, 2026.

<https://codes.iccsafe.org/content/CAWUIC2025P2/chapter-6-fire-protection-requirements>.

Artemis. "Golden Bear Re Ltd. (Series 2026-1)." *Artemis Deal Directory*. Accessed February 1, 2026. <https://www.artemis.bm/deal-directory/golden-bear-re-ltd-series-2026-1/>.

Austin, Troy, et al. "A Spatial Analysis of Structure Loss and Survival Resulting from the 2018 Camp Fire in Paradise, California." *Frames Resource Catalog*. February 19, 2020. Accessed November 25, 2025. <https://www.frames.gov/catalog/60818>

Becker, Jo. "California Promised Insurance Relief, But Delivered Loopholes." *New York Times*. November 1, 2025. Accessed November 25, 2025.

<https://www.nytimes.com/2025/11/01/us/los-angeles-california-fire-insurance-regulations.html>

CAL FIRE. Office of the State Fire Marshal. Fire Hazard Severity Zones. Fire Hazard Severity Zones in Local Responsibility Area>Phase 4>Orange>

<https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/folder/312669458215>

CAL FIRE. Top 20 Deadliest California Wildfires. Accessed October 9, 2025.

<https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/top-20-deadliest-ca-wildfires.pdf?rev=0d4612ff0cb447fb827fa0ac6c309d3d&hash=34718653A215C315C5E3CB5BB6A4E550>

CAL FIRE. Top 20 Most Destructive California Wildfires. Accessed October 9, 2025.

<https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/top-20-destructive-ca-wildfires.pdf?rev=737a1073f76947b4a3bfb960b19f44c7&hash=7CA02D30D9BF46A32D5D98BD108BA26A>

California Board of Forestry and Fire Protection. *Fire Risk Reduction Community List*.

Accessed February 16, 2026. <https://bof.fire.ca.gov/projects-and-programs/fire-risk-reduction-community-list>.

California Code of Regulations Title 14, Section 1280.

<https://regulations.justia.com/states/california/title-14/division-1-5/chapter-7/subchapter-3/article-1/section-1280/>

California Department of Insurance – Wildfire Risk Reduction Regulations

California Department of Insurance. *CAL FIRE hazard maps do not affect insurance rates or availability*. Accessed February 1, 2026. <https://www.insurance.ca.gov/0400-news/0102-alerts/2025/CAL-FIRE-hazard-maps-do-not-affect-insu.cfm>

The California FAIR Plan. <https://www.cfpnet.com/>

California Government Code 51175-89. <https://law.justia.com/codes/california/code-gov/title-5/division-1/part-1/chapter-6-8/section-51175/>

California Insurance Code § 2644.9

California Insurance Code sections 10090 et seq.

<https://law.justia.com/codes/california/code-ins/division-2/part-1/chapter-9/section-10090/>

California Public Resources Code 4201-4204.

<https://law.justia.com/codes/california/code-prc/division-4/part-2/chapter-1/article-9/>

California Public Resources Code Division 4 - Forests, Forestry and Range and Forage Lands Part 2 - Protection of Forest, Range and Forage Lands Chapter 3 - Mountainous, Forest-, Brush- and Grass-Covered Lands Section 4291. Accessed January 14, 2026.

<https://law.justia.com/codes/california/code-prc/division-4/part-2/chapter-3/section-4291/>.

California's Sustainable Insurance Strategy. Accessed January 22, 2026.

<https://boe.ca.gov/meetings/pdf/2024/202402-CA-Insurance-Martinez.pdf>.

Center for Critical Urban and Environmental Studies. University of California, Santa Cruz. *Wildland Urban Interface (WUI) Research for Resilience: Addressing California's Climate, Conservation & Housing Crises*. Accessed November 25, 2025.

<https://criticalurbanenvironments.ucsc.edu/projects/wildland-urban-interface-wui-research-for-resilience/>.

Cohen, Jack. The Wildland-Urban Interface Fire Problem: A Consequence of the Fire Exclusion Paradigm. *Forest History Today*. Fall 2008: 20-26.

Copley, Michael. "California Fire Victims Say Fighting with Insurance Companies Has Delayed Rebuilding." *NPR News*, January 13, 2026. <https://www.kanw.org/npr-news/2026-01-13/california-fire-victims-say-fighting-with-insurance-companies-has-delayed-rebuilding>.

Edelson, Josh. [Cover page lower left image of a home survives Palisades Fire]. Photograph. Agence France-Presse / Getty Images. Accessed March 25, 2026.

Edelson, Josh. [Cover page lower right image of a home burns in Paradise, California during the Camp Fire]. Photograph. “*In Camp Fire, Newer Houses Were Much Less Damaged Accessed.*” The Sacramento Bee. April 11, 2019. Accessed March 25, 2026. <https://www.kqed.org/science/1940012/newer-houses-much-less-damaged-in-camp-fire>

Executive Order N-13-23. <https://www.gov.ca.gov/wp-content/uploads/2023/09/9.21.23-Homeowners-Insurance-EO.pdf>

Executive Order N-18-25. Accessed January 13, 2026. <https://www.gov.ca.gov/wp-content/uploads/2025/02/2025-2-6.Urban-Conflagration-EO-ATTESTED.pdf>.

Fallon, Patrick T. [A House a hill with fire and smoke]. Photograph. Agence France-Presse / Getty Images. Accessed March 25, 2026.

Firewise USA program managed by National Fire Protection Association (NFPA). <https://www.nfpa.org/Education-and-Research/Wildfire/Firewise-USA>

Hall, Alex – Journal of Environmental Research, September 8, 2015.

Gammanco, Ian M., et al. *The Return of Conflagration in Our Built Environment*. Insurance Institute for Business and Home Safety. September 2023. Accessed March 20, 2026. https://ibhs.org/wp-content/uploads/Suburban_Wildfire_Conflagration_WhitePaper.pdf.

Hayrikian, Mashall A.. *Engineering and Environmental Implications of the LA wildfires: Eaton and Palisades Fire*. Marshall Geoscience – Geotechnical Engineering Laboratory Services. <http://www.marshallgeo.com/geotechnical-engineering/engineering-and-environmental-implications-of-la-wildfires-eaton-palisades-fires/>.

Instagram. [Cover page upper left image of Wildland-Urban Interface at Rancho Mission Viejo]. Photograph. Accessed March 25, 2026. <https://www.instagram.com/popular/rancho-mission-viejo-ca/>.

Instagram. [Rancho Mission Viejo.com]. Photograph. Accessed March 25, 2026. https://www.instagram.com/p/CsmLvqIMqm2/?utm_source=ig_web_copy_link&igshid=MzRlODBiNWFiZA%3D%3D.

IBHS Research. Wildland Fire Embers and Flames: Home Mitigations That Matter. April 2023. Accessed February 10, 2026. <https://ibhs1.wpenginepowered.com/wp-content/uploads/Home-Mitigations-that-Matter-FINAL.pdf>.

Institute for Business & Home Safety. Wildfire Prepared Neighborhood Pilot Program. Accessed March 19, 2026. <https://wildfireprepared.org/wildfire-prepared-neighborhood-pilot-program/>.

Jacobo, Julia and Ginger Zee, Ginger. *A perfect storm of weather and climate conditions led to the severity of the California fires*, ABC News, Accessed January 8, 2026, <http://www.abcnews.com/US/perfect-storm-weather-climate-conditions-severity-california-fires/story?id=117468072>

Kasler, Dale and Reese, Phillip. “*In Camp Fire, Newer Houses Were Much Less Damaged.*” The Sacramento Bee. April 11, 2019, updated January 9, 2024. Accessed March 4, 2026. <https://www.kqed.org/science/1940012/newer-%D8%8Cuses-much-less-damaged-in-camp-fire>.

McChrystal Group. *After-Action Review of Alert Notification Systems and Evacuation Policies for the Eaton and Palisades Fires*. Los Angeles County Board of Supervisors, September 25, 2025. <https://lacounty.gov/2025/09/25/la-county-releases-after-action-review-of-alert-notification-systems-and-evacuation-policies-for-the-eaton-and-palisades-fires/>.

Miller, Rebecca. “*Residents Reducing Wildfire Risks: Findings from the NFPA® Firewise® Sites of Excellence Pilot, 2019-2020*,” May 2022. NFPA® Firewise USA®: *Residents Reducing Wildfire Risks*. <https://www.nfpa.org/education-and-research/wildfire/firewise-usa/firewise-sites-of-excellence>

National Institute of Building Science. “*Natural Hazard Mitigation Saves.*” 2019. https://nibs.org/wp-content/uploads/2025/04/NIBS_MMC_MitigationSaves_2019-1.pdf

Orange County Fire Authority. *Resource Library*. Accessed March 8, 2026. <https://ocfa.org/documents/>.

Orange County Grand Jury (2025 – 2026). [OCFA helicopter approaching Yorba Linda Water District Heli-Hydrant™]. Photograph, January 27, 2026. Unpublished internal documentation.

Orange County Grand Jury (2025 – 2026). [Cover page upper right image of Orange County Fire Authority helicopter water drop]. Photograph, January 27, 2026. Unpublished internal documentation.

Polacek, Andy. 2018. “*Catastrophe Bonds: A Primer and Retrospective.*” Chicago Fed Letter, no. 405. Federal Reserve Bank of Chicago. <https://www.chicagofed.org/publications/chicago-fed-letter/2018/405>.

Rojanasakul, Jira, & Brown, Claire. “*America’s Home Insurance Affordability Crunch: See What’s Happening Near You.*” New York Times. November 19, 2025. Accessed

November 25, 2025. <https://www.nytimes.com/interactive/2025/11/19/climate/home-insurance-premiums-costs-usa.html?smid=nytcore-android-share>

San Diego County Grand Jury. “Fire Country: Forging a United Defense in the Backcountry,” *SanDiegoCounty.gov*. May 15, 2025.

<https://www.sandiegocounty.gov/content/dam/sdc/grandjury/reports/2024-2025/fire-country/Fire-%20Final%20Filed%20Version.pdf>

Senate Bill 504. Accessed January 14, 2026.

<https://legiscan.com/CA/text/SB504/id/3018449>.

State of California Board of Forestry and Fire Protection. Accessed January 14, 2026.

<https://bof.fire.ca.gov/projects-and-programs/defensible-space-zones-0-1-and-2>.

The California FAIR Plan. *Key Statistics & Data*. Accessed March 8, 2026.

<https://www.cfpnet.com/key-statistics-data/>

Thompson, Andrea. *How the Ferocious Santa Ana Winds are Fueling the Palisades Fire*. Scientific American. Accessed January 7, 2026. <http://www.scientificamerican.com>

United Policyholders – WRAP Resource Center and Safer from Wildfires Initiative

U.S. Fire Administration. *What is the WUI?* Accessed November 25, 2025.

<https://www.usfa.fema.gov/wui/what-is-the-wui/>

Weathered: After the LA Firestorm. Directed by Trip Jennings. Presented by Maiya May. PBS, 2026. 56 min.

Wildland-Urban Interface. Forest Service, U.S. Department of Agriculture. Accessed January 12, 2026.

<https://research.fs.usda.gov/nrs/fire/wui>.

Yufang, Jin, et al. *Identification of two distinct fire regimes in Southern California: implications for economic impact and future change*. Environmental Research Letters, Volume 1, Number 9. IOP Science, September 8, 2015. Accessed January 9, 2026.

<https://iopscience.iop.org/article/10.1088/1748-9326/10/9/094005>.

“ZIP Codes in Orange County, California.” *Felt.com*. Accessed November 11, 2025.

<https://felt.com/map/ZIP-Codes-in-Orange-County-California-GX3e19BKrS5uwCICY3r5gFD?loc=33.6408,-117.7804,9z>.

Appendix A

CAL FIRE Wildfire Data

Top 20 Deadliest California Wildfires

FIRE NAME (CAUSE)	DATE	COUNTY	ACRES	STRUCTURES	DEATHS
1 CAMP FIRE (Powerlines)	November 2018	Butte	153,330	18,804	85
2 GRIFFITH PARK (Unknown)	October 1933	Los Angeles	47	0	29
3 TUNNEL - Oakland Hills (Rekindle)	October 1991	Alameda	1,600	2,900	25
4 TUBBS (Electrical)	October 2017	Napa & Sonoma	36,807	5,643	22
5 EATON (Under Investigation)*	January 2025	Los Angeles	14,021	9,413	19
6 NORTH COMPLEX (Lightning)	August 2020	Butte, Plumas, & Yuba	315,935	2,352	15
7 CEDAR (Human Related)	October 2003	San Diego	273,246	2,820	15
8 RATTLESNAKE (Arson)	July 1953	Glenn	1,340	0	15
9 PALISADES (Under Investigation)*	January 2025	Los Angeles	23,707	6,883	12
10 LOOP (Unknown)	November 1965	Los Angeles	2,025	0	12
11 HAUSER CREEK (Human Related)	October 1943	San Diego	18,145	0	11
12 INAJA (Human Related)	November 1955	San Diego	43,904	0	11
13 IRON ALPS COMPLEX (Lightning)	August 2008	Trinity	105,855	10	10
14 REDWOOD VALLEY (Power Lines)	October 2017	Mendocino	30,323	544	9
15 HARRIS (Undetermined)	October 2007	San Diego	90,440	548	8
16 CANYON (Unknown)	August 1968	Los Angeles	22,197	0	8
17 CARR (Human Related)	July 2018	Shasta County, Trinity	229,691	1614	8
18 LNU Lightning Complex (Lightning/Arson)	August 2020	Napa/Sonoma/Yolo/Stamblauss' Lake	363,220	1,491	6
19 ATLAS (Powerline)	October 2017	Napa & Solano	51,624	781	6
20 OLD (Human Related)	October 2003	San Bernardino	91,281	1,003	6

** Fires with the same death count are listed by most recent. Several fires have had 4 fatalities, but only the most recent are listed.

***This list does not include fire jurisdiction. These are the Top 20 regardless of whether they were state, federal, or local responsibility.



Source: CalFire Redbook Data

Figure 11 Top 20 Deadliest California Wildfires

Top 20 Most Destructive California Wildfires

FIRE NAME (CAUSE)	DATE	COUNTY	ACRES	STRUCTURES	DEATHS
1 CAMP (Powerlines)	November 2018	Butte	183,336	18,804	85
2 EATON (Under Investigation)*	January 2025	Los Angeles	14,021	9,413	19
3 PALISADES (Under Investigation)*	January 2025	Los Angeles	23,707	6,833	12
4 TUBBS (Electrical)	October 2017	Napa & Sonoma	36,807	5,636	22
5 TUNNEL - Oakland Hills (Rekindle)	October 1991	Alameda	1,600	2,900	25
6 CEDAR (Human Related)	October 2003	San Diego	273,246	2,820	15
7 NORTH COMPLEX (Lightning)	August, 2020	Butte, Plumas, & Yuba	318,935	2,352	15
8 VALLEY (Electrical)	September 2015	Lake, Napa & Sonoma	76,067	1,955	4
9 WITCH (Powerlines)	October 2007	San Diego	197,990	1,650	2
10 WOOLSEY (Electrical)	November 2018	Ventura	96,949	1,643	3
11 CARR (Human Related)	July 2018	Shasta County, Trinity	229,651	1,614	8
12 GLASS (Undetermined)	September 2020	Napa & Sonoma	67,484	1,520	0
13 LNU LIGHTNING COMPLEX (Lightning/Arson)	August 2020	Napa, Solano, Sonoma, Yolo, Lake, & Colusa	363,320	1,491	6
14 CZU LIGHTNING COMPLEX (Lightning)	August 2020	Santa Cruz, San Mateo	86,509	1,490	1
15 NUNS (Powerline)	October 2017	Sonoma	54,382	1,355	3
16 DIXIE (Powerline)	July 2021	Butte, Plumas, Lassen, & Tehama	963,309	1,311	1
17 THOMAS (Powerline)	December 2017	Ventura & Santa Barbara	281,893	1,063	2
18 CALDOR (Under Investigation)	September 2021	Alpine, Amador, & El Dorado	221,774	1,003	1
19 OLD (Human Related)	October 2003	San Bernardino	91,281	1,003	6
20 JONES (Undetermined)	October 1969	Shasta	26,200	954	1

Structures include homes, outbuildings (barns, garages, sheds, etc) and commercial properties destroyed.
 This list does not include fire jurisdiction. These are the Top 20 regardless of whether they were state, federal, local or tribal responsibility.
 *Numbers not final *DINIS Disclaimer: These numbers are preliminary based on aerial assessments dedicating heat sources which can include chicken coops, outbuildings, sheds, water containers, etc. *Validated inspections are currently being ground-verified by Damage Assessment Teams.



7-757825

Source: CalFire Redbook Data

Figure 12 Top 20 Most Destructive California Wildfires

Incident #	County	Fire Name	Date		Direct Protection Area	Acres Burned	Vegetation Type	Cause	Structures		Fatalities	
			Start	Contained					Destroyed	Damaged	Firefighters	Civilians
ORC-127883	ORANGE RIVERSIDE	AIRPORT	9/9/24	10/5/24	CC	23,526	B, G	EQUIPMENT	160	34		
CNF-405	ORANGE	JIM	3/2/22	3/9/22	USFS	553	B, G	HUMAN				
ORC-136890	ORANGE	BOND	12/2/20	12/11/20	CC	6,686	B, G	STRUCTURE	31	21		
ORC-121612	ORANGE	BLUE RIDGE	10/26/20	11/7/20	CC	13,694	B, G	UNDETERMINED	1	12		
ORC-121364	ORANGE	SILVERADO	10/26/20	11/7/20	CC	12,466	B, G	UNDER INVESTIGATION	5	11		
CNF-2664	ORANGE RIVERSIDE	HOLY	8/6/18	9/14/18	USFS	23,025	B, G	ARSON	24	18		
ORC-110494	ORANGE	CANYON 2	10/9/17	10/17/17	CC	9,217	B, G	MISCELLANEOUS	25	55		
ORC-1478	ORANGE	CANYON	9/25/17	10/3/17	CC	2,662	B, G	MISCELLANEOUS	7			
CNF-2873	ORANGE	SILVERADO	9/12/14	9/20/14	USFS	985	B	UNDETERMINED				
ORC-045067	ORANGE	CARBON CANYON	7/7/11	7/8/11	CALFIRE/CC	508	B	UNDETERMINED				

Notes:
 B = Brush
 G = Grass
 CC = Contract Counties
 USFS = United States Forest Service
 Source: CalFire Redbook Data

Figure 13 Large Fires 300 Acres and Greater - State and Contract Counties Direct Protection Area

Year	County	Fire Name	Total	A < 0.25 Acres	B 0.26 - 9.99 Acres	C 10 - 99 Acres	D 100 - 299 Acres	E 300 - 999 Acres	F 1000 - 4999 Acres	G > 5000 Acres
2024	Orange	Airport	39	31	5	1	1	0	0	1
2023	Orange	-	28	18	10	0	0	0	0	0
2022	Orange	Jim	30	23	4	0	2	1	0	0
2021	Orange	-	7	5	2	0	0	0	0	0
2020	Orange	Bond, Blue Ridge, Silverado	45	33	7	2	0	0	0	3
2019	Orange	-	46	36	7	2	1	0	0	0
2018	Orange	Holy	57	49	5	0	2	0	0	1
2017	Orange	Canyon, Canyon 2	71	56	12	1	0	0	1	1
2016	Orange	-	42	33	4	5	0	0	0	0
2015	Orange	-	3	2	1	0	0	0	0	0
2014	Orange	Silverado	8	6	1	0	0	1	0	0
2013	Orange	-	13	12	1	0	0	0	0	0
2012	Orange	-	19	16	2	1	0	0	0	0
2011	Orange	Carbon Canyon	10	9	0	0	0	1	0	0
2010	Orange	-	7	1	5	1	0	0	0	0
2009	Orange	-	10	6	0	3	1	0	0	0
2008	Orange	-	8	6	2	0	0	0	0	0
2008 - 2024	Annualized	-	26.1	20.1	4.0	0.9	0.4	0.2	0.1	0.4

Yellow highlight signifies named fires including fires that span both Orange and Riverside counties
 Source: CalFire Redbook Data

Figure 14 Orange County Wildfires by Size

Appendix B

Safer from Wildfires Flyer

**Being
Safer from Wildfires
Can Help With Your Insurance**



Safer from Wildfires is a ground-up approach to wildfire resilience with three layers of protection — for the structure, the immediate surroundings, and the community. Following these achievable steps can help you save money on your insurance.



Safer from Wildfires was created by an interagency partnership between Insurance Commissioner Ricardo Lara and the emergency response and readiness agencies in Governor Gavin Newsom's administration. Learn more at insurance.ca.gov

Figure 15 Safer from Wildfires Flyer, Page 1

3 Ways to Get Started with **Safer from Wildfires**

Don't know where to start? Here are 3 low-cost steps you can take today.



Keep embers out

Installing 1/16 to 1/8 inch noncombustible, corrosion-resistant metal mesh screens over attic vents can keep wind-blown embers out of your house.



Clear the first 5 feet

Removing greenery and replacing wood chips with stone or decomposed granite 5 feet around your home prevents fire from getting a foot in the door.



Be safer together

With Firewise USA, communities as small as 8 dwelling units or as big as 2,500 can create an action plan and start being safer together. Firewise USA is a nationally recognized program with proven results, sponsored by the National Fire Prevention Association.

Do more, save more

Every action under **Safer from Wildfires** will qualify you for an insurance discount. By doing more, you can save more.

- Class A fire-rated roof
- 5-foot ember-resistant zone around the structure
- Noncombustible 6 inches at the bottom of walls
- Ember- and fire-resistant vents
- Double pane windows or added shutters
- Enclosed eaves
- Cleared vegetation and debris from under decks
- Move sheds and outbuildings at least 30 feet away
- Trim trees and remove brush in compliance with state and local defensible space laws
- Neighborhoods can form a Firewise USA community
- Cities, counties, and local districts can become certified as a Fire Risk Reduction Community

Scan to find more resources



Figure 16 Safer from Wildfires Flyer, Page 2

Appendix C

Fire Hazard Severity Zone Map of Orange County

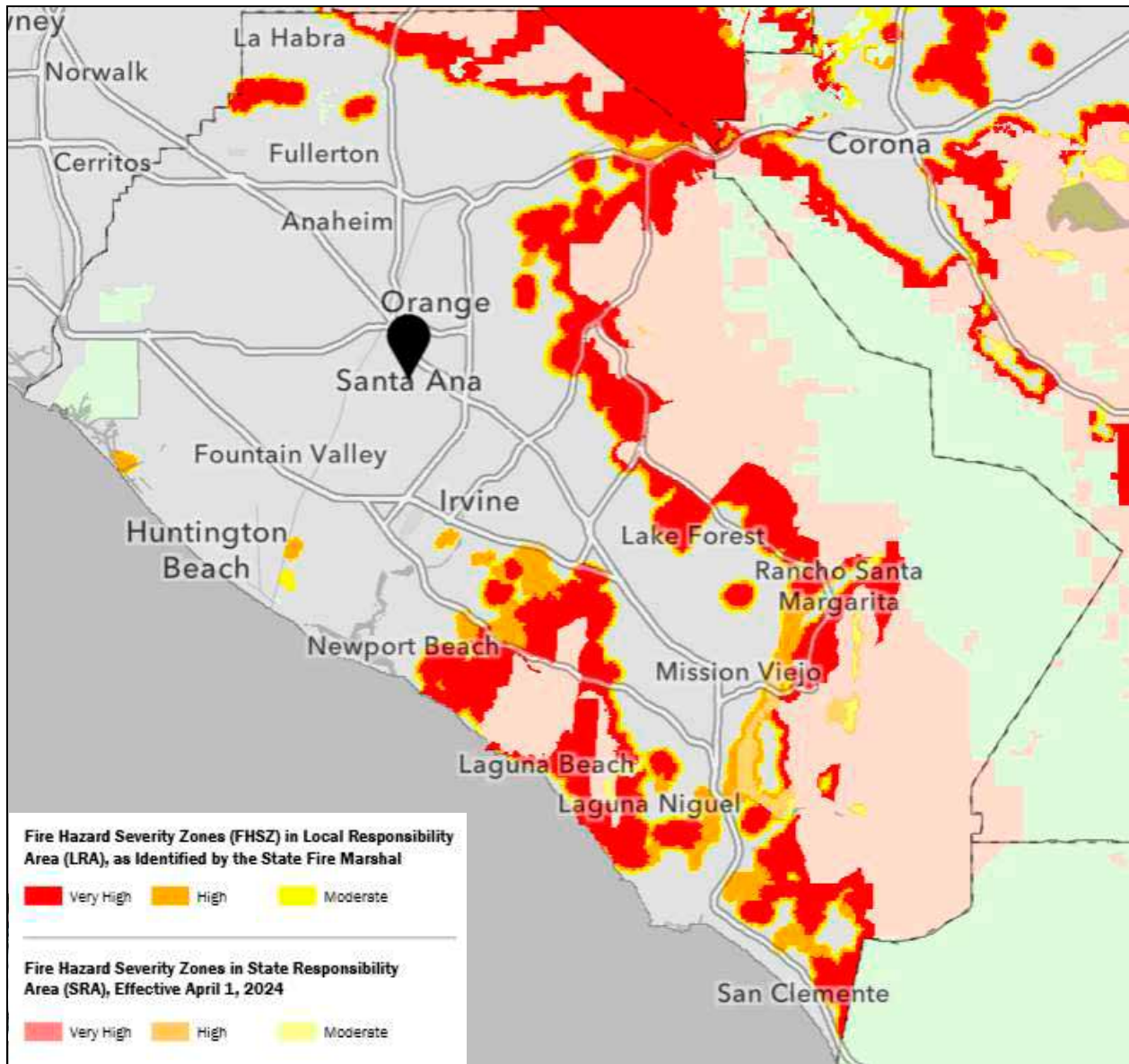


Figure 17 Fire Hazard Severity Zone Map of Orange County

Appendix D

3



**FIRE HARDENING AND DEFENSIBLE SPACE
DISCLOSURE AND ADDENDUM**
 (C.A.R. Form FHDS, Revised 6/25)

This is a disclosure and addendum to the Purchase Agreement, OR ☐ Other _____ ("Agreement"),
 dated _____, on property known as _____ ("Property"),
 in which _____ is referred to as Buyer,
 and _____ is referred to as Seller.

1. **LAW APPLICABILITY:** If this property does not meet the conditions stated in paragraph 1A or 1B, there is no requirement to complete the subsequent applicable paragraphs.

A. Home Fire Hardening Disclosure: The Notice and disclosure of vulnerabilities in paragraph 2 are only required for sellers of residential properties if: (i) the Property contains one to four units; (ii) the seller is required to complete a Transfer Disclosure Statement (C.A.R. Form TDS or MHTDS); (iii) the Property is located in either a **high or very high** fire hazard severity zone; and (iv) the improvement(s) on the Property were constructed before January 1, 2010. IF ANY OF THESE FOUR CONDITIONS IS NOT MET, SELLER DOES NOT HAVE TO ANSWER THE QUESTIONS IN PARAGRAPH 2B AND 2C.

B. Defensible Space Compliance: The disclosures and requirements specified in paragraph 3 are only required for sellers of residential properties if: (i) the Property contains one to four units; (ii) the seller is required to complete a Transfer Disclosure Statement (C.A.R. Form TDS or MHTDS); and (iii) the Property is located in either a **high or very high** fire hazard severity zone. IF ANY OF THESE THREE CONDITIONS IS NOT MET, PARAGRAPH 3 DOES NOT HAVE TO BE COMPLETED.

C. Fire Hazard Severity Zone Status: It may be possible to determine if a property is in a **high or very high** fire hazard severity zone by consulting with a natural hazard zone disclosure company or reviewing the company's report. This information may also be available through a local agency where this information should have been filed. Cal Fire has a "Fire Hazard Severity Zone Viewer" where you can input the Property address to determine which fire hazard zone, if any, that the Property is located in. A link to the viewer can be found on Cal Fire's website at <https://www.fire.ca.gov/dspace/>.

2. **FIRE HARDENING DISCLOSURE** (☐ Property is built on or after January 1, 2010. Paragraphs 2B and 2C do not have to be completed):

A. FIRE HARDENING STATUTORY NOTICE: THIS HOME IS LOCATED IN A HIGH OR VERY HIGH FIRE HAZARD SEVERITY ZONE AND THIS HOME WAS BUILT BEFORE THE IMPLEMENTATION OF THE WILDFIRE URBAN INTERFACE BUILDING CODES WHICH HELP TO FIRE HARDEN A HOME. TO BETTER PROTECT YOUR HOME FROM WILDFIRE, YOU MIGHT NEED TO CONSIDER IMPROVEMENTS. INFORMATION ON FIRE HARDENING, INCLUDING CURRENT BUILDING STANDARDS AND INFORMATION ON MINIMUM ANNUAL VEGETATION MANAGEMENT STANDARDS TO PROTECT HOMES FROM WILDFIRES, CAN BE OBTAINED ON THE INTERNET WEBSITE [HTTP://WWW.READYFORWILDFIRE.ORG](http://WWW.READYFORWILDFIRE.ORG).

B. FIRE HARDENING VULNERABILITIES: Are you (Seller) aware of the following features that may make the home vulnerable to wildfire and flying embers (Seller is not obligated to explain or clarify their responses to questions 2B(1)-2B(6), whether they answer "yes" or "no." Voluntary explanation/clarification is permitted but not required).

(1) Eave, soffit, and roof ventilation where the vents have openings in excess of one-eighth of an inch or are not flame and ember resistant.....	☐ Yes ☐ No
(2) Roof coverings made of untreated wood shingles or shakes.....	☐ Yes ☐ No
(3) Combustible landscaping or other materials within five feet of the home and under the footprint of any attached deck.....	☐ Yes ☐ No
(4) Single pane or non-tempered glass windows.....	☐ Yes ☐ No
(5) Loose or missing bird stopping or roof flashing.....	☐ Yes ☐ No
(6) Rain gutters without metal or noncombustible gutter covers.....	☐ Yes ☐ No

Explanation/Clarification: _____

C. LIST OF LOW COST RETROFITS: The following is a list of low cost retrofits developed and listed by the California Department of Forestry and Fire Protection (CAL FIRE) and the California Governor's Office of Emergency Services (OES). More information on home hardening is available at readyforwildfire.org. A list of low cost retrofits with dynamic links can be found at <https://readyforwildfire.org/wp-content/uploads/2025/04/Low-Cost-Retrofit-Flyer-Handout.pdf>.

Have you (Seller) completed any of the following low-cost retrofits during the time you have owned the property? (If the retrofit was partially completed or only applied to a portion of the identified feature, or if similar work was performed, or if your response below needs clarification, provide the explanation/clarification below. If you are unsure if the retrofit item was completed or satisfied the conditions specified, check "No" and provide any explanation/clarification below.)

(1) Roof replaced with Class A fire-rated roof.....	☐ Yes ☐ No
(2) Spaces between roof covering and sheathing blocked with non-combustible materials (bird stops).....	☐ Yes ☐ No
(3) Installation of noncombustible gutter cover on gutters to prevent the accumulation of leaves and debris in the gutter.....	☐ Yes ☐ No
(4) Covered chimney and stovepipe outlets with a noncombustible corrosion-resistant metal mesh screen (spark arrestor), with 3/8 inch to 1/2 inch openings.....	☐ Yes ☐ No
(5) Install ember and flame-resistant vents.....	☐ Yes ☐ No
(6) Caulk and plug gaps greater than 1/8-inch around exposed rafters and blocking to prevent ember intrusion into the attic or other enclosed spaces.....	☐ Yes ☐ No
(7) Inspect exterior siding for dry rot, gaps, cracks, and warping. Caulk or plug gaps greater than 1/8-inch in siding and replace any damaged boards, including those with dry rot.....	☐ Yes ☐ No
(8) Install weather-stripping to gaps greater than 1/8-inch between garage doors and door frames to prevent ember intrusion. The weather-stripping must be compliant with UL Standard 10C.....	☐ Yes ☐ No
(9) Replace windows with multi-paned windows that have at least one pane of tempered glass.....	☐ Yes ☐ No
(10) Replace siding or deck using compliant noncombustible, ignition-resistant, or other OSFM Wildland Urban Interface (WUI) Products.....	☐ Yes ☐ No

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FHDS REVISED 6/25 (PAGE 1 OF 2)

Buyer's Initials _____ / _____ Seller's Initials _____ / _____



FIRE HARDENING AND DEFENSIBLE SPACE DISCLOSURE AND ADDENDUM (FHDS PAGE 1 OF 2)

Figure 18 Fire Hardening and Defensible Space Disclosure, Page 1

(11) Cover openings to operable skylights with a noncombustible metal mesh screen with openings in the screen not to exceed 1/8 inch. ☐ Yes ☐ No

(12) Install a minimum 6-inch metal flashing, applied vertically on the exterior of the wall at the deck-to-wall intersection to protect the combustible siding material. ☐ Yes ☐ No

Explanation/Clarification: _____

3. **DEFENSIBLE SPACE DISCLOSURE AND ADDENDUM:** (Paragraph 3 is only required to be completed if all three conditions in paragraph 1B are met; the Defensible Space Decision Tree (C.A.R. Form DSDT) may be consulted for additional information on how to complete this paragraph):

A. LOCAL COMPLIANCE REQUIREMENTS: The Property (☐ IS, ☐ IS NOT) subject to a local vegetation management ordinance requiring defensible space around an improvement on the Property. (Paragraphs 3B and 3C must be completed regardless of the answer to paragraph 3A if the conditions in paragraph 1B are met.)

B. SELLER REPRESENTATION OF PROPERTY COMPLIANCE with the applicable State defensible space requirement or local vegetation management ordinance (hereafter, State or local defensible space law) at the time of Seller signature:

(1) Seller is UNWARE of whether the Property is in compliance with the applicable State or local defensible space law. Seller does NOT have a report prepared by an Authorized Defensible Space Inspector.

OR (2) ☐ Property IS in compliance with State or local defensible space law, whichever is applicable. If ONLY State law applies, Seller must have obtained compliance within the last 6 months. Seller shall Deliver to Buyer documentation of compliance within 3 (or _____) Days after Seller's execution of this FHDS form or the time specified in paragraph 3N(1) of the Agreement, whichever occurs last. If this paragraph is checked, also check paragraph 3C(5) below.

OR (3) ☐ Property is NOT in compliance with State or local defensible space law, whichever is applicable. If Seller has, or agrees to obtain, a report prepared by an Authorized Defensible Space Inspector, Seller shall Deliver such report to Buyer within 3 (or _____) Days after Seller's execution of this FHDS form or the time specified in paragraph 3N(1) of the Agreement, whichever occurs last.

C. BUYER AND SELLER AGREEMENT REGARDING WHICH PARTY SHALL OBTAIN COMPLIANCE WITH APPLICABLE STATE OR LOCAL DEFENSIBLE SPACE REQUIREMENTS:

(1) **BUYER RESPONSIBILITY – NO LOCAL ORDINANCE.** Buyer shall obtain documentation of compliance with the State defensible space law within one year of Close Of Escrow.*

OR (2) ☐ **BUYER RESPONSIBILITY – LOCAL VEGETATION MANAGEMENT ORDINANCE IN EFFECT** which requires compliance as a result of a sale of the Property. The local ordinance allows either Seller or Buyer to obtain documentation of compliance. Buyer shall comply with the requirements of the ordinance after Close Of Escrow.

OR (3) ☐ **BUYER RESPONSIBILITY – LOCAL VEGETATION MANAGEMENT ORDINANCE IN EFFECT** which does NOT require compliance as a result of a sale of the Property. Buyer shall obtain documentation of compliance with the State defensible space law within one year of Close Of Escrow,* or if applicable comply with the local requirement after Close Of Escrow.

OR (4) ☐ **SELLER RESPONSIBILITY – LOCAL VEGETATION MANAGEMENT ORDINANCE IN EFFECT** which requires compliance as a result of a sale of the Property. The local ordinance requires Seller to obtain documentation of compliance prior to Close of Escrow. Seller shall obtain documentation of compliance prior to the time for Buyer's final verification of condition.

OR (5) ☐ **SELLER RESPONSIBILITY – STATE OR LOCAL COMPLIANCE ALREADY COMPLETE.** If ONLY state law applies, Seller has obtained documentation of compliance with State defensible space requirement within the last 6 months. For either State or local law, Seller shall Deliver documentation of compliance to Buyer.

OR (6) ☐ **SELLER RESPONSIBILITY – AGREEMENT TO OBTAIN STATE COMPLIANCE.** Seller shall obtain documentation of compliance and Deliver to Buyer prior to the time for Buyer's final verification of condition.

D. The local agency from which a copy of the documentation in paragraph 3B(2), 3B(3), 3C(4), 3C(5), or 3C(6), as applicable, may be obtained is _____, which may be contacted at _____.

* The requirement to provide documentation of compliance with State defensible space requirements only applies if there is a state or local agency, or other governmental entity, or qualified non-profit entity in the jurisdiction where the Property is located that is authorized to inspect the Property and provide documentation of compliance ("Authorized Defensible Space Inspector").

4. ☐ **FINAL INSPECTION REPORT DISCLOSURE:** The Property was newly constructed, or was rebuilt following damage by a fire and the construction required a permit, and Seller has obtained a final inspection report addressing compliance with home fire hardening recommended building standards as described in Government Code § 51182. Seller has a copy of the report, and it is attached, or ☐ Seller does not have a copy of the report and Buyer may obtain a copy at _____.

Seller represents that Seller has provided the answers on paragraphs 2B and 3B of this form based on Seller's awareness on the date of Seller's signature below, and the answers on paragraph 2C are accurate. Seller acknowledges receipt of this Fire Hardening and Defensible Space Disclosure and Addendum and agrees to the applicable terms in paragraph 3C.

Seller _____ Date _____

Seller _____ Date _____

By signing below, Buyer acknowledges that they have received a copy of this Fire Hardening and Defensible Space Disclosure and Addendum, and they have read and understand the form and agree to the terms in paragraph 3C.

Buyer _____ Date _____

Buyer _____ Date _____

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FHDS REVISED 6/25 (PAGE 2 OF 2)

FIRE HARDENING AND DEFENSIBLE SPACE DISCLOSURE AND ADDENDUM (FHDS PAGE 2 OF 2)

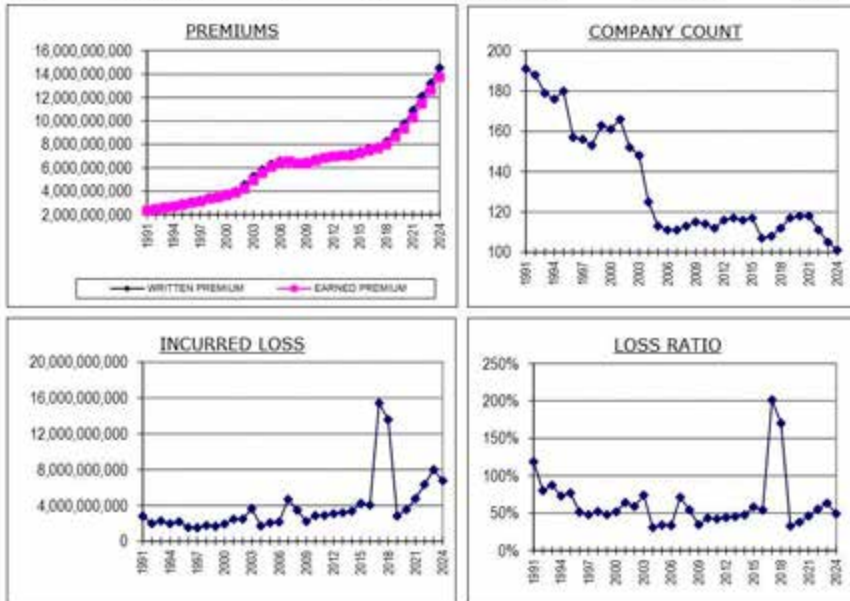
Figure 19 Fire Hardening and Defensible Space Disclosure, Page 2

Appendix E

California Department of Insurance Data

1991-2024 CALIFORNIA P&C HISTORICAL PREMIUM AND LOSS
Line of Business: HOMEOWNERS MULTIPLE PERIL [04]

YEAR	WRITTEN PREMIUM	% Chg.	Co.Count	EARNED PREMIUM	INCURRED LOSS	LOSS RATIO
1991	2,398,651,496		191	2,349,924,901	2,791,008,371	118.77%
1992	2,555,745,940	6.5%	188	2,468,835,484	1,980,200,380	80.21%
1993	2,669,536,350	4.5%	179	2,588,229,132	2,260,932,154	87.35%
1994	2,757,073,066	3.3%	176	2,688,902,970	1,957,548,203	72.80%
1995	2,934,990,317	6.5%	180	2,828,528,558	2,170,026,959	76.72%
1996	3,090,172,058	5.3%	157	2,992,922,532	1,536,204,414	51.33%
1997	3,219,673,063	4.2%	156	3,128,673,253	1,493,329,331	47.73%
1998	3,445,849,365	7.0%	153	3,358,899,095	1,758,775,892	52.36%
1999	3,560,100,595	3.3%	163	3,476,827,465	1,663,998,077	47.86%
2000	3,740,477,538	5.1%	161	3,676,266,079	1,908,291,220	51.91%
2001	3,992,960,925	6.8%	166	3,866,932,308	2,474,244,352	63.98%
2002	4,565,626,156	14.3%	152	4,211,592,936	2,476,270,849	58.80%
2003	5,296,194,308	16.0%	148	4,935,892,774	3,647,291,668	73.89%
2004	5,843,429,606	10.3%	125	5,560,574,064	1,715,301,749	30.85%
2005	6,305,176,422	7.9%	113	6,065,178,507	2,063,072,529	34.02%
2006	6,591,912,516	4.5%	111	6,436,870,073	2,147,266,579	33.36%
2007	6,453,088,200	-2.1%	111	6,568,857,449	4,675,914,725	71.18%
2008	6,355,980,869	-1.5%	113	6,386,251,776	3,452,898,028	54.07%
2009	6,513,371,686	2.5%	115	6,391,096,439	2,209,791,955	34.58%
2010	6,758,183,845	3.8%	114	6,612,865,838	2,870,059,793	43.40%
2011	6,896,796,197	2.1%	112	6,832,454,959	2,890,230,414	42.30%
2012	7,018,043,553	1.8%	116	6,962,824,501	3,076,419,837	44.18%
2013	7,033,097,194	0.2%	117	7,038,071,457	3,189,727,981	45.32%
2014	7,202,319,845	2.4%	116	7,031,937,018	3,351,846,286	47.67%
2015	7,409,994,305	2.9%	117	7,248,990,918	4,230,850,026	58.36%
2016	7,645,677,515	3.2%	107	7,475,784,553	4,047,329,931	54.14%
2017	7,761,932,830	1.5%	108	7,664,490,935	15,418,577,650	201.17%
2018	8,266,332,994	6.5%	112	7,983,075,132	13,577,455,112	170.08%
2019	9,004,847,173	8.9%	117	8,631,287,540	2,818,562,833	32.66%
2020	9,767,233,243	8.5%	118	9,362,270,255	3,539,955,749	37.81%
2021	10,912,068,287	11.7%	118	10,298,463,872	4,753,166,698	46.15%
2022	12,084,613,385	10.7%	111	11,480,004,192	6,333,910,318	55.17%
2023	13,218,555,040	9.4%	105	12,615,427,773	7,990,111,685	63.34%
2024	14,516,380,112	9.8%	101	13,749,361,195	6,760,543,067	49.17%



Note: This report includes only California licensed companies with written premium greater than zero.

California Department of Insurance

Rate Specialist Bureau - April 30, 2025

Figure 20 California Property and Casualty Insurance Company Homeowners Premium and Loss

Zip Code	Fire Hazard Severity Zone	CDI Wildfire Distress Area	City	Vanity City or Location	Residential Dwellings Insured by Voluntary Market	Residential Dwellings Insured by FAIR Plan	Percentage of Residential Dwellings Insured by FAIR Plan
90620	None		Buena Park		10,826	20	0.2%
90621	VH, H, M, None		Buena Park	Los Coyotes CC	3,863	19	0.5%
90623	None		La Palma		3,701	7	0.2%
90630	None		Cypress		10,692	22	0.2%
90631	VH, H, M, None		La Habra	Westridge CC	12,999	274	2.1%
90680	None		Stanton		3,591	9	0.3%
90720	None		Los Alamitos		5,821	4	0.1%
90740	None		Seal Beach		4,741	6	0.1%
90742	None		Huntington Beach	Sunset Beach	303	4	1.3%
90743	None		Seal Beach	Surfside	139	2	1.4%
92602	VH, H, M, None		Irvine	Loma Ridge	5,755	23	0.4%
92603	VH, H, M, None		Irvine	Turtle Rock, Shady Canyon	4,115	20	0.5%
92604	None		Irvine		4,660	3	0.1%
92606	None		Irvine		3,195	1	0.0%
92610	VH, H, M, None		Lake Forest	Foothill Ranch	2,996	41	1.4%
92612	H, M, None		Irvine	William R. Mason Regional Park	1,574	1	0.1%
92614	None		Irvine		3,102	4	0.1%
92617	M, None		Irvine	UCI	993	0	0.0%
92618	VH, H, M, None		Irvine	Laguna Altura, Borrego Canyon	9,789	17	0.2%
92620	VH, H, M, None		Irvine	Stonegate	12,171	11	0.1%
92624	H, M, None		Dana Point	Capistrano Beach	2,255	4	0.2%
92625	VH, H, M, None		Newport Beach	Corona Del Mar	4,423	7	0.2%
92626	None		Costa Mesa		8,817	4	0.0%
92627	H, M, None		Costa Mesa	Talbert Regional Park	9,748	14	0.1%
92629	VH, H, M, None		Dana Point	Crown Valley Pkwy.	7,229	8	0.1%
92630	VH, H, M, None		Lake Forest	Saddleback Church	14,090	24	0.2%
92637	VH, H, M, None		Laguna Woods	Laguna Canyon	545	0	0.0%
92646	None		Huntington Beach		14,923	11	0.1%
92647	None		Huntington Beach		11,451	14	0.1%
92648	None		Huntington Beach		8,997	6	0.1%
92649	H, M, None		Huntington Beach	Brightwater Dr., Oceanridge Dr.	8,363	6	0.1%
92651	VH, H, M, None		Laguna Beach		8,760	459	5.0%
92653	VH, H, M, None		Laguna Hills	North Laguna Hills	6,266	13	0.2%
92655	None		Unincorporated OC	Midway City	1,408	1	0.1%
92656	VH, H, M, None		Aliso Viejo	Wood Canyon Dr.	7,537	37	0.5%
92657	VH, H		Newport Beach	Newport Coast	3,133	100	3.1%
92660	H, M, None		Newport Beach	Newport Ridge Clubhouse	7,209	15	0.2%
92661	None		Newport Beach	Balboa Peninsula	1,683	4	0.2%
92662	None		Newport Beach	Balboa Island	1,367	1	0.1%
92663	M, None		Newport Beach	Canyon Park	5,479	10	0.2%
92672	VH, H, M, None		San Clemente		8,901	37	0.4%
92673	VH, H, M, None		San Clemente		7,804	42	0.5%
92675	VH, H, M, None		San Juan Capistrano		8,415	58	0.7%
92676	VH	Yes	Unincorporated OC	Silverado	156	550	77.9%
92677	VH, H, M, None		Laguna Niguel	Pacific Island Dr., Salt Creek Open Space	14,861	112	0.7%
92678	VH	Yes	Unincorporated OC	Trabuco Canyon	16	15	48.4%
92679	VH, H, M		Unincorporated OC	Trabuco Canyon, Coto de Caza, Dove Canyon	8,019	1,052	11.6%

Note: P. O. Boxes are excluded from this list. Data is for calendar year 2022 and includes homeowners (excluding condominium), mobile home, dwelling fire owner- and tenant-occupied insuring structures with four or less units.

Source: California Department of Insurance

Figure 21 FAIR Plan Data for Orange County Zip Codes 90620 - 92679

Zip Code	Fire Hazard Severity Zone	CDI Wildfire Distress Area	City	Vanity City or Location	Residential Dwellings Insured by Voluntary Market	Residential Dwellings Insured by FAIR Plan	Percentage of Residential Dwellings Insured by FAIR Plan
92683	None		Westminster		16,837	20	0.1%
92688	VH, H, M, None		Rancho Santa Margarita		7,872	52	0.7%
92691	VH, H, M, None		Mission Viejo	Wilderness Glen Park	11,920	10	0.1%
92692	VH, H, M, None		Mission Viejo		12,832	26	0.2%
92694	VH, H, M, None		Unincorporated OC	Ladera Ranch	7,453	42	0.6%
92697	None		Irvine	UCI	0	0	0.0%
92698	None		Aliso Viejo		0	0	0.0%
92701	None		Santa Ana		3,818	77	2.0%
92703	None		Santa Ana		7,396	97	1.3%
92704	None		Santa Ana		10,533	82	0.8%
92705	VH, H, M, None		Santa Ana	Cowan Heights, Peters Canyon	9,699	34	0.3%
92706	None		Santa Ana		5,507	6	0.1%
92707	None		Santa Ana		7,554	77	1.0%
92708	None		Fountain Valley		13,293	9	0.1%
92780	None		Tustin		7,315	2	0.0%
92782	VH, H, M, None		Tustin	Pioneer Road Park	4,483	12	0.3%
92801	None		Anaheim		6,802	20	0.3%
92802	None		Anaheim		4,421	15	0.3%
92804	None		Anaheim		11,474	22	0.2%
92805	None		Anaheim		8,715	24	0.3%
92806	None		Anaheim		5,357	11	0.2%
92807	VH, H, M, None		Anaheim	Walnut Canyon Reservoir	9,178	67	0.7%
92808	VH, H, M, None		Anaheim	Anaheim Hills	4,648	34	0.7%
92809	None		Anaheim		0	0	0.0%
92821	VH, H, M, None		Brea		8,838	64	0.7%
92823	VH, H, M, None		Brea	Carbon Canyon Rd.	1,380	55	3.8%
92831	VH, H, M, None		Fullerton	Panorama Nature Preserve	5,326	11	0.2%
92832	None		Fullerton		3,846	7	0.2%
92833	VH, H, M, None		Fullerton	Ralph B. Clark Park	10,168	22	0.2%
92835	VH, H, M, None		Fullerton	Rolling Hills Park, Laguna Lake Park	6,157	11	0.2%
92840	None		Garden Grove		8,946	6	0.1%
92841	None		Garden Grove		6,013	2	0.0%
92843	None		Garden Grove		6,064	9	0.1%
92844	None		Garden Grove		2,763	1	0.0%
92845	None		Garden Grove		4,808	1	0.0%
92861	VH, H, M, None		Villa Park		1,964	2	0.1%
92862	VH, H, M, None		Unincorporated OC	Black Star Canyon	6	0	0.0%
92865	None		Orange		4,257	10	0.2%
92866	None		Orange		3,048	1	0.0%
92867	VH, H, M, None		Orange	Santiago Oaks Regional Park	9,943	12	0.1%
92868	None		Orange		2,776	3	0.1%
92869	VH, H, M, None		Orange	El Modena Open Space	8,215	25	0.3%
92870	None		Placentia		10,759	15	0.1%
92886	VH, H, M, None		Yorba Linda	Black Gold GC	13,587	82	0.6%
92887	VH, H, M, None		Yorba Linda	Box Canyon Park	5,210	217	4.0%
92799	None		Santa Ana	Distribution Center	0	0	0.0%
92850	None		Anaheim		0	0	0.0%
92899	None		Anaheim	Distribution Center	0	0	0.0%
Totals					588,062	4,387	0.7%

Note: P. O. Boxes are excluded from this list. Data is for calendar year 2022 and includes homeowners (excluding condominium), mobile home, dwelling fire owner- and tenant-occupied insuring structures with four or less units.

Source: California Department of Insurance

Figure 22 FAIR Plan Data for Orange County Zip Codes 92680 – 92899

Appendix F

OCFA and Covered Cities



Figure 23 Orange County Fire Authority Covered Cities

Orange County Fire Jurisdictions

Anaheim Fire Department

201 S. Anaheim Blvd., Suite 301
Anaheim, CA 92805
714-765-4000

Brea Fire Department

1 Civic Center Circle
Brea, CA 92821
714-990-7600

Costa Mesa Fire Department

2803 Royal Palm Dr.
Costa Mesa, CA 92628
714-754-5106

Fountain Valley Fire Department

10200 Slater Ave.
Fountain Valley, CA 92708
714-593-4436

Fullerton Fire Department

312 E. Commonwealth Ave.
Fullerton, CA 92832
714-738-6500

Placentia Fire and Life Safety Dept.

401 E Chapman Avenue
Placentia, CA 92870
714 9938117

Huntington Beach Fire Department

2000 Main St.
Huntington Beach, CA 92648
714-536-5411

La Habra - LA County Fire Department

1320N. Eastern Avenue
Los Angeles, CA 90063-3220
323-881-2411

Laguna Beach Fire Department

505 Forest Ave.
Laguna Beach, CA 92651
949-497-3311

Newport Beach Fire Department

3300 Newport Blvd.
Newport Beach, CA 92663
949-644-3104

Orange Fire Department

176 S. Grand Ave.
Orange, CA 92866
714-288-2500

Orange County Fire Authority

1 Fire Authority Road
Irvine, CA 92602
714-573-6000

The OCFA provides fire services for the following cities: Aliso Viejo • Buena Park • Cypress • Dana Point • Garden Grove • Irvine • Laguna Hills • Laguna Niguel • Laguna Woods • Lake Forest • La Palma • Los Alamitos • Mission Viejo • Rancho Santa Margarita • San Clemente • San Juan Capistrano • Santa Ana • Seal Beach • Stanton • Tustin • Villa Park • Westminster • Yorba Linda • and Unincorporated Areas of Orange County

DIAL 911 FOR EMERGENCY SERVICES

Figure 24 Orange County Fire Jurisdictions

Appendix G

Ready, Set, Go!, Zone 0 At-A-Glance and Links



READY, SET, GO!
IMMEDIATE ZONE

The main objective of the Immediate Zone, or 0 to 5 feet zone, is to reduce the potential that embers landing near a building will ignite fuels and expose the area around a home to a direct flame.


The Immediate Zone is the most important zone to reduce home ignition from flying embers. Install hard surfaces, reduce vegetation, and eliminate combustible mulch.


Orange County Fire Authority
www.ocfa.org/RSG

Changes made to the Immediate Zone can make a big impact in reducing structure loss during a wildfire

- Use hardscape like gravel, pavers, concrete and other noncombustible material. No combustible bark or mulch
- Remove all dead and dying weeds, grass, plants, shrubs, trees, branches and vegetative debris (leaves, needles, cones, bark, etc.); Check your roofs, gutters, decks, porches, stairways, etc.
- Remove all branches within 10 feet of any chimney or stovepipe outlet
- Limit plants in this area to low growing (below 2 feet), nonwoody, properly watered and maintained plants
- Limit combustible items (outdoor furniture, storage, planters, etc.) on top of decks
- Relocate firewood and lumber 30 feet away from buildings
- Replace combustible fencing, gates, and arbors attached to the home with noncombustible alternatives
- Consider relocating garbage and recycling containers outside this zone
- Consider relocating boats, RVs, vehicles and other combustible items outside this zone


Immediate Zone

For more information, please visit the OCFA website or call (714) 573-6774 to schedule a Wildfire Home Assessment.

Regulations for wildfire safety are dynamic and new requirements may be enacted by the State of California and its regulatory agencies at any time. Projects must comply with all state requirements for vegetation management and wildfire safety, in addition to the requirements in this guideline, in place at the time of plan submittal. Where a conflict between this guideline and other applicable regulations exists, the more stringent or specific requirement will apply.

Figure 25 Ready, Set Go! Flyer for Immediate Zone



READY, SET, GO!
DEFENSIBLE SPACE

Defensible Space is an area between your house and an oncoming wildfire, where the vegetation has been controlled, trimmed, or removed to reduce wildfire threat from embers, flames, and intense heat.

In order to offer wildfire protection, Defensible Space should reach at least 100 feet from the house, garage, and other buildings on the property, or to the property line. In many cases, Defensible Space is simply the front, side, and back yards of your home.

Guidelines for Vegetation Management within 100 feet of your home include:

- Remove all dead and dying plants
- Recommend removal of vegetation found on the Undesirable Plant List and replant using drought-tolerant, fire-resistive plants
- Trim or remove plants to create the recommended vertical and horizontal separation between them
- Remove dry leaves, twigs, pine needles, etc. from the yard, roof, and rain gutters
- Install hard surfaces, reduce vegetation, and eliminate combustible mulch within 5 feet of home

It's not necessary to remove all vegetation around your home, but creating Defensible Space will give firefighters a better chance of keeping wildfire from spreading to your home. Mowing, weeding, pruning, thinning, spacing, and careful plant selection can make the difference between survival and losing your home during a wildfire. Consult a geologist prior to beginning maintenance if you have slope stability issues.

Creating Defensible Space is the duty of every resident living in an area at risk for wildfires.

Orange County Fire Authority
www.ocfa.org/RSG

For more information, please visit the OCFA website or call **(714) 573-6774** to schedule a Wildfire Home Assessment.

Figure 26 Ready, Set, Go! Flyer on Defensible Space




HOME HARDENING

The main objective of Home Hardening is to give your home the best chance to survive a wildfire. Home Hardening addresses the most vulnerable components of your home, which includes the construction materials that make up your home and the quality of defensible space surrounding it.



Prepare (harden) your home now before a wildfire starts!



Orange County Fire Authority

www.ocfa.org/RSG

All new homes built in the Wildland Urban Interface (WUI) are required to meet the minimum standards for the protection of life and property by increasing the home's ability to resist ember intrusion, direct flames, and radiant heat. Homes can be retrofitted to these new building requirements using the recommendations listed below:

1. **Roof** - Ember-resistant material. Gaps are filled with ignition-resistant material. No loose roof flashing.
2. **Eaves** - Eaves are maintained with all gaps filled with caulking and painted over.
3. **Vents** - 1/8-inch metal mesh screen or ember proof vents.
4. **Chimney** - 1/2-inch spark arrestor screen. Clear tree branches and/or vegetation at least 10 feet away from opening.
5. **Gutters** - Install gutter guards. Remove combustible debris on a regular basis.
6. **Exterior Siding** - Exterior siding is maintained with all gaps filled with caulking and painted over.
7. **Doors** - Weather-stripping around door frames and doors adjusted for a "tight fit" within the frame.
8. **Windows** - Multi-pane windows, with at least one pane being tempered, and metal framing.
9. **Fences** - Non-combustible or ignition-resistant material. Maintain fencing by keeping vegetation clear.
10. **Patio Covers** - Ignition-resistant material. Fill all gaps and crevices. Install metal flashing between the patio and outside wall.
11. **Balconies & Decks** - Ignition-resistant material. Fill all gaps between the deck and outside wall with caulking or metal flashing. Remove or replace combustible items stored above and below.
12. **Immediate Zone** - No woody vegetation located within 5 feet of the home. No combustible items located within 5 feet of the home (trash bins, patio furniture, storage, mulch, etc.)

Refer to the California Wildland Urban Interface Code (CWUIC) for permits and specific requirements.

For more information, please visit the OCFA website or call **(714) 573-6774** to schedule a Wildfire Home Assessment.

Figure 27 Ready, Set, Go! Flyer for Home Hardening, Page 1

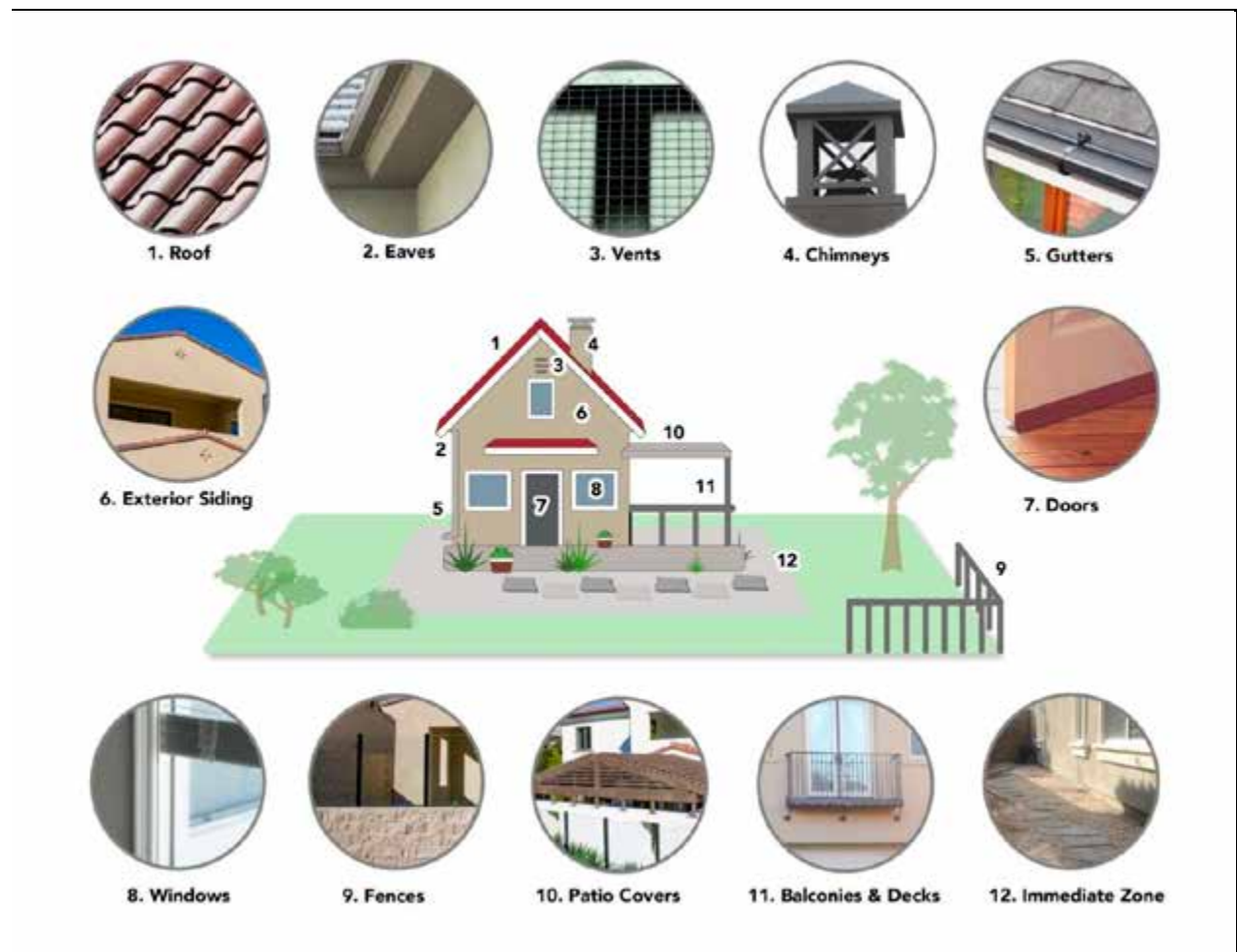


Figure 28 Ready, Set, Go! Flyer for Home Hardening, Page 2



READY, SET, GO!
VEGETATION MANAGEMENT

Vegetation Management is controlling plant material to prevent wildfire spread. It requires a constant commitment to follow the 4 R's of Vegetation Management to reduce the threat.



Vegetation Management isn't a one-time fix. It's an ongoing commitment.



Orange County Fire Authority

www.ocfa.org/RSg

Removal:

- Remove all dead and dying plants within 100 feet of your home
- Identify and remove plants found on OCFA's Undesirable Plant List
- Remove dry leaves, bark and pine needles from the yard, roof, and rain gutters

Reduction:

- Prune and thin plants within 100 feet of your home, including your plants within 100 feet of your neighbor's home
- Provide 6 feet vertical separation between shrub tops and lower tree branches to reduce "ladder fuels"
- Use Horizontal Separation Guidelines for plants over 2 feet in height (15 feet minimum or 3 times the tallest plant)
- Keep all shrubs within 10 feet of your home trimmed to 2 feet or lower
- Prune or remove plants near windows
- Remove all tree branches or plants within 10 feet of chimney outlets
- Move wood piles at least 30 feet from your home, or to the property line
- Keep annual grasses and weeds cut to 4 inches or less

Replacement:

- Replace fire-prone plants with fire-resistant and drought tolerant plants. See the OCFA Planting Guide for recommendations
- When putting in new plants, leave enough space for them to grow to mature size
- Any vegetation over 2 feet cannot be within 15 feet of a tree canopy

Resistant:

- Use fire-resistant plants whenever possible
- Keep in mind that even plants listed on the Planting Guide must be maintained using Spacing Guidelines for both vertical and horizontal separation. Plant separation is an important part reducing wildfire threat

For more information, please visit the OCFA website or call **(714) 573-6774** to schedule a wildfire home assessment.

Figure 29 Ready, Set, Go! Flyer on Vegetation Management



READY, SET, GO!
BE EMBER AWARE

Embers are burning pieces of vegetation or other flammable material and are the leading cause of structural damage and home loss from a wildfire.



In order to successfully protect your home, you need to understand the real threat during a wildfire.

Once they're picked up by strong winds, embers can travel as much as five miles in front of the active front of a wildfire. Before flames get anywhere near your home, embers can land in dry or flammable vegetation or small open spaces on your roof or walls, and ignite, threatening your home.

If embers fall on and ignite nearby plants, the radiant heat created by the fire can burn combustible siding, doors, or window frames. Radiant heat can also cause windows to break, creating openings that allow flames and embers to enter your home. Once the home is on fire, it will create more embers that can be picked up by winds, travel to other homes and neighborhoods, and increase fire damage for the entire community.

Embers create a huge threat during a wildfire. It's the steps you take now to make your home and landscaping more ember-resistant that will protect your family, your home, and your community during the next wildfire. Take responsibility!



Orange County Fire Authority

www.ocfa.org/RSG

For more information, please visit the OCFA website or call **(714) 573-6774** to schedule a Wildfire Home Assessment.

Figure 30 Ready, Set, Go! On Be Ember Aware




READY, SET, GO! HOME ASSESSMENT

A Wildfire Home Assessment is a meeting at your home with a Fire Department representative, who will give you tips on how to better protect your home from a wildfire.



**Don't wait.
Set up a
FREE Home
Assessment to
protect your
home today.**



**Orange County
Fire Authority**

www.ocfa.org/RSG

Experts can't tell you when the next wildfire will happen, but they do know that wildfires can happen at any time in Southern California. Many residents have not taken the most basic steps to protect their families, homes and neighborhoods from Orange County's #1 fire risk.

During your FREE Wildfire Home Assessment, the outside of your home and property, along with other risk factors, will be evaluated. Then, you'll be given specific steps you can take to reduce your home's vulnerability to wildfire.

Many proven tips to help your home survive a wildfire are available 24/7 at ocfa.org, including:

Landscaping	Construction	Safety
Plant Selection Spacing Separation Dead & Dying Plants Fuel Modification Creating Defensible Space Vegetation Management	Balconies & Decks Chimneys Fences Garages Patio Covers Rain Gutters Roofs, Eaves, & Vents Walls and Siding Windows	Ember Awareness As Wildfire Approaches Wildfire Evacuation If You Get Trapped Disaster Kits & Go! Bags Red Flag Warnings

Homes survive wildfires because of what you do to prepare for them ahead of time, not by fate or luck. No matter where you live, or how much money you can spend, there are things that you can do right now to help protect your home.

To schedule your FREE Home Assessment:




Figure 31 Ready, Set, Go! Flyer on Home Assessment



Wildfire Home Risk Assessment

Are You READY?

READY! SET! GO!

Directions: Answer each question using assigned point values as it applies to the home. If the question does not apply, score it as a zero. Total the points to determine the risk level for the home.

Home			
Condition found	Recommendation	Points	Total
The home has all non-combustible siding (brick, stucco, metal)		0	
The home has some vinyl siding	Replace siding with non-combustible material	5	
The home has some wood siding		10	
The roof material is non-combustible (metal, composition, tile) with no areas for fire embers to intrude (i.e. has bird stops, flashing at valleys, and blocking)		0	
The roof has wood shakes or areas for fire embers to intrude	Replace wood shake with Class A roof assembly with approved "blocking" material. Eliminate intrusion areas	20	
All chimneys have spark arresters		0	
Some chimneys do not have spark arresters	Install spark arresters with 1/2" non-combustible mesh ¹	5	
All gutters and roof are clear of combustible debris		0	
Some gutters and/or roof have combustible debris present	Clear all combustible debris from roof and gutters. Install screens on gutters to reduce the accumulation of combustible debris ¹	5	
All eaves are boxed to prevent ember collection underneath		0	
Some eaves are not boxed	Plug openings in open-eave areas with durable caulk. Install a non-combustible covering over blocking to eliminate openings	5	
All windows are dual pane with durable frame (one pane is tempered).		0	
Some windows are single pane or have wood frames or do not have any tempered glass	Replace with dual pane windows with a durable frame. One pane should be tempered	5	
All eave and cornice vents are baffled. All other vents are protected with 1/8" non-combustible mesh		0	
Some eave vents and cornice vents are present and are not baffled or some vents are not protected by 1/8" non-combustible mesh	Replace eave and cornice vents with approved baffled vents. Protect all other vents with 1/8" non-combustible mesh. Keep the areas around the vents clear of vegetation	10	
Patio cover is constructed or covered with non-combustible material (brick, stucco, metal) or is not within 10' of home		0	
Patio cover is constructed with uncovered combustible material and is within 10' of home	Replace with non-combustible material or cover with non-combustible material (brick, stucco, metal)	5	
All balconies are constructed or covered with non-combustible material (brick, stucco, metal, tile, etc.). Undersides are protected to prevent ember accumulation		0	
Some balconies are constructed with combustible material or combustible material is exposed or undersides are unprotected	Replace with non-combustible material or cover with non-combustible material. Protect undersides	5	
All decks are constructed with non-combustible material (composite, tile, brick, etc.)		0	
Some decking is constructed with combustible material (un-approved vinyl, wood, etc.)	Replace with non-combustible material or cover with non-combustible material	10	
The undersides of all raised decks are constructed or covered with non-combustible material (brick, stucco, metal, tile, etc.)		0	
The undersides of some raised decks are constructed with combustible material and not covered with non-combustible material (brick, stucco, metal, tile, etc.)	Replace with non-combustible deck or cover with non-combustible material (brick, stucco, metal, tile, etc.)	10	
All fences, gazebos, and trellis's are 10' or more from the home or are constructed with non-combustible material		0	
Some fencing, gazebos or trellis's are less than 10' from the home and constructed with combustible material	Replace fencing, gazebo or trellis with non-combustible material within 10' from the house	5	

Figure 32 Ready, Set, Go! Flyer on Wildfire Home Risk Assessment, Page 1

Landscape			
Condition found	Recommendation	Points	
All vegetation is green and well watered (not annual grasses) and/or drought resistant		0	
Some vegetation is dead or not drought or fire resistant	Remove ALL dead vegetation and replace with fire resistant planting material. Visit www.ocfa.org for recommendations	10	
All shrubs are at least 5' from structures		0	
Some shrubs are within 5' of structures	Replace shrubs with low lying vegetation or thin shrubs to 50% density	10	
All overhanging limbs are at least 10' above roofs and at least 10' away from structures		0	
Some overhanging limbs are less than 10' from roofs and structures	Remove all limbs within 10' from structures ¹	5	
All taller vegetation is pruned and separated from underbrush and separated from trees. Separation between shrubs and trees is at least 3 times height of shrubs. Separation between low lying vegetation and shrubs is at least 3 times height of low lying vegetation. Spacing between shrubs is at least three times width of shrubs		0	
Some taller vegetation hangs over underbrush creating a "fuel ladder" that can carry fire up and toward the home	Provide separation between low lying vegetation and shrubs. Provide separation between shrubs and trees.	10	
All outbuildings and secondary structures are at least 20' from the home or constructed with non-combustible material		0	
Some outbuildings and secondary structures are within 20' of the home and constructed with combustible material	Replace with non-combustible material or cover with non-combustible material	5	
Perimeter			
Condition found	Recommendation	Points	
Home has at least 100' of brush clearance around it or is protected by a formal and compliant "fuel modification" program		0	
Home has 30' - 100' of defensible space	Remove dead or dying vegetation within 100' of homes. Remove native vegetation within 30' of home. Thin native vegetation 50% density within 30' to 100' of home ¹	5	
Home has less than 30' of defensible space		10	
All firewood and other combustible materials are stored at least 30' from the home		0	
Some firewood or other combustible materials are stored against or within 30' of home	Move firewood and other combustible storage at least 30' away from home ¹	10	
TOTAL SCORE _____			
SCORING: During a wildfire, firefighters are better able to protect homes that have low scores. Firefighters may not be able to protect homes that have higher scores. 0: Your home has the greatest potential for survivability during a hostile wildfire. 5-20: Your home has been identified as a low risk . Recommendations indicated on this checklist should be addressed to increase the survivability of your home during a hostile wildfire. 25-40: Your home has been identified as a moderate risk . Survivability of your home will be an issue during a hostile wildfire. Recommendations indicated on this checklist should be completed. 45 and above: Your home has been identified as a high risk . The survivability of your home is low. Your home may be in extreme danger during a hostile wildfire. Recommendations indicated on this checklist are strongly encouraged to be completed.			
For additional information on how to increase the chance your home will survive a wildfire, please visit the Orange County Fire Authority's Safety and Education page at www.ocfa.org and the State Fire Marshal's wildland urban interface products page at http://osfm.fire.ca.gov/licensinglistings/licenselisting_bml_searchcotest .			
If you walk your property without an OCFA inspector and have questions afterwards feel free to contact us at 714-573-6774 or rsgoc@ocfa.org			
¹ For some homeowners, these recommendations may be requirements of the fire code. If the property is near a wildland area and is subject to a Defensible Space inspection, this is not just a recommendation, but a requirement and subject to a Wildland Inspection Notice.			

For follow up questions regarding this risk assessment, please contact:

Consultation Performed by:

Name: _____

Phone: _____

Date: _____

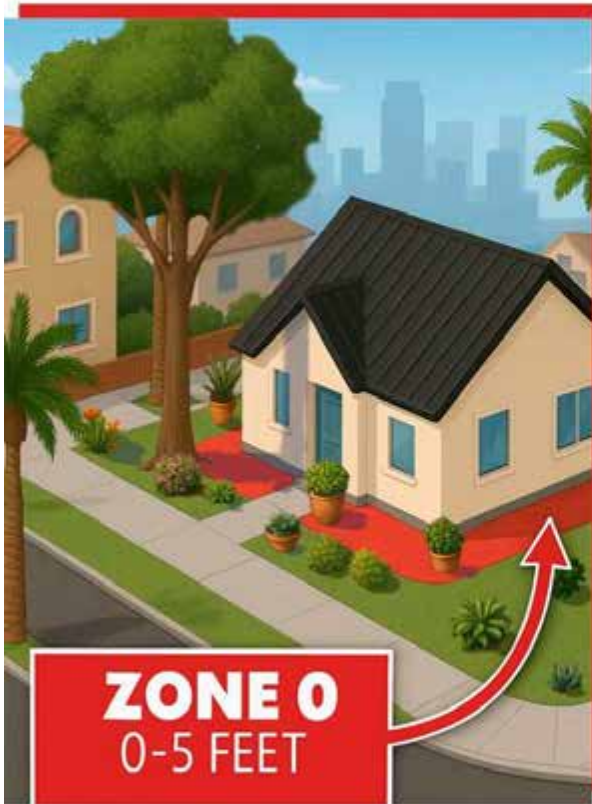
Figure 33 Ready, Set, Go! Flyer on Wildfire Home Risk Assessment, Page 2

ZONE 0 AT-A-GLANCE



Wind-driven embers during wildfires are a leading cause of homes being destroyed, including in the 2025 Los Angeles fires. Californians can protect their homes by removing items that can ignite from these dangerous embers around the first five feet of their homes.

In 2021 state leaders passed a law that requires statewide guidelines that protect the area immediately adjacent to homes, which is known as "Zone 0". Since then, several cities have already adopted Zone 0 requirements on their own and the California Department of Insurance has established the Safer from Wildfires Program to enable home insurance discounts for implementation of these protective measures.



ZONE 0
0-5 FEET

Zone 0 is the first five feet surrounding your home, decks, and attached structures. This area is called the ember-resistant zone and is critical to wildfire defense. The goal is simple: keep this zone completely free of combustible materials so embers or flames cannot ignite your home.

ZONE 0 GUIDELINES

- Use pavers, concrete, or other hardscape materials instead of combustible mulch.
- Clear dead weeds, grass, and debris; check roofs, gutters, and outdoor areas.
Keep branches trimmed 10 feet away from chimneys and stovepipes.
- Minimize combustible items like furniture and planters on decks.
- Move firewood and lumber to Zone 2 for safety.
- Replace combustible fencing and gates with fire-resistant materials.
Shift garbage and recycling containers to a safer area outside this zone.
- Relocate boats, RVs, and vehicles away from this zone to reduce fire risks.
- Plants can be added just outside Zone 0 as a way to maintain vegetation around the home.



Figure 34 Zone 0 At-A-Glance, Page 1

ZONE 0 AT-A-GLANCE



THE SCIENCE BEHIND ZONE 0

In an ongoing collaboration, CAL FIRE - Office of the State Fire Marshal (OSFM) and the Insurance Institute for Business & Home Safety (IBHS) continue to conduct live burn demonstrations using a mitigated and nonmitigated structure.

The demonstrations provide a controlled environment to study how specific structural and landscape modifications mitigate wildfire risk, thereby offering data-driven insights into fire behavior and prevention.

Research has concluded that removing flammable materials within the first five feet of a structure prevents embers from starting a fire, greatly reducing the risk of ignition to exterior walls, eaves, and gutters—areas where wildfire embers can easily take hold. Keeping this area clear is one of the best protection measures you can take to protect your home.



- **Zone 0 Landscaping** – Non-mitigated home had wood mulch, plants, and a wooden fence within five feet, acting as a wick for flames. The mitigated home used gravel, hardscaping, and a metal fence, removing fuel for embers.
- **Vents** – Standard vents let embers enter and ignite the attic. Ember-resistant vents on the mitigated home blocked them.
- **Siding** – Flammable siding to the ground allowed flames to climb. The mitigated home used noncombustible material at the base.
- **Gutters** – Debris-filled plastic gutters fueled ember ignition. The mitigated home had clean metal gutters with noncombustible gutter guards to prevent debris accumulation.
- **Furniture** – Flammable outdoor furniture on the non-mitigated home ignited from embers. The mitigated home used noncombustible furniture, preventing ignition.

MORE RESOURCES [LINKTR.EE/CALFIREZONE0](https://linktr.ee/calfirezone0)
SCIENCE, VIDEOS, AND MORE...



Figure 35 Zone 0 At-A-Glance, Page 2

Links

Immediate Zone

<https://storageocfaprod001.blob.core.windows.net/blobocfaprod01/2025/12/Immediate-Zone-2025.pdf>

Defensible Space

<https://storageocfaprod001.blob.core.windows.net/blobocfaprod01/2025/03/OCFA-RSG-Defensible-Space-1-1.pdf>

Home Hardening

<https://storageocfaprod001.blob.core.windows.net/blobocfaprod01/2025/12/Home-Hardening-2025.pdf>

Vegetation Management

<https://storageocfaprod001.blob.core.windows.net/blobocfaprod01/2026/01/OCFA-RSG-Vegetation-Management.pdf>

Be Amber Aware

<https://storageocfaprod001.blob.core.windows.net/blobocfaprod01/2025/07/OCFA-RSG-Be-Ember-Aware-688b04d7e4fb9.pdf>

Home Assessment

<https://storageocfaprod001.blob.core.windows.net/blobocfaprod01/2025/12/Home-Assessment-2025.pdf>

Wildfire Home Risk Assessment

<https://storageocfaprod001.blob.core.windows.net/blobocfaprod01/2025/07/OCFA-RSG-Home-Assessment-Form-688b05b09d57e.pdf>

Zone 0 At-A-Glance

<https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/prepare/zone-0-at-a-glance.pdf>



California Housing Mandates

**The Unintended Reshaping of Orange County
Neighborhoods**



Orange County Grand Jury 2025-2026

TABLE OF CONTENTS

SUMMARY	5
BACKGROUND	6
REASON FOR STUDY	9
METHOD OF STUDY.....	10
RESEARCH.....	10
INTERVIEWS	10
OBSERVATIONS AND SITE VISITS.....	10
PUBLIC FORUMS AND EVENTS	11
GOVERNMENT MEETINGS	11
DOCUMENT REVIEW	11
CITY SURVEY.....	11
INVESTIGATION AND ANALYSIS.....	11
STATE HOUSING MANDATES AND LOCAL IMPLEMENTATION	11
ENVIRONMENTAL CONTEXT AND CEQA	13
REGIONAL HOUSING NEEDS ASSESSMENT PROCESS	15
REGIONAL HOUSING NEEDS ANALYSIS CHALLENGES	17
PENALTIES FOR NOT HAVING AN HCD-APPROVED HOUSING ELEMENT.....	19
PENALTIES FOR NOT MEETING HOUSING-PLAN CONSTRUCTION GOALS	20
FEASIBILITY OF HOUSING MANDATE IN ORANGE COUNTY	20
ONE SIZE DOES NOT FIT ALL	22
CALIFORNIA AND ORANGE COUNTY POPULATION TRENDS	23
6 TH CYCLE (2021-2029) HOUSING ALLOCATIONS IN OC	25
CITY CHALLENGES.....	27
7 TH CYCLE (2029-2037) CONCERNS	31
CONCLUSION.....	32
FINDINGS	34
RECOMMENDATIONS.....	36
RESPONSES CODE	40
RESPONSES	41
GLOSSARY AND ACRONYMS	45
BIBLIOGRAPHY	49
APPENDIX	55

APPENDIX A: MAJOR HOUSING LAWS & WHAT THEY TRIED TO DO	55
APPENDIX B: ORANGE COUNTY HOUSING MANDATE SURVEY QUESTIONS.....	65
APPENDIX C: RESPONSIBILITIES.....	65
<i>Responsibilities of OCCOG</i>	65
<i>Responsibilities of SCAG</i>	66
<i>Responsibilities of HCD</i>	66

SUMMARY

California's perceived housing shortage has prompted the California Legislature to impose increasingly bureaucratic prescriptive State Housing Mandates (Housing Mandates) on local governments, with the stated goal of accelerating production across all income levels. Core frameworks such as the Housing Element and the Regional Housing Needs Allocation (RHNA) process require cities and counties to plan for significant increases in housing capacity. Many additional statutes have contributed to a streamlined development approval process and weakened local discretion with severe penalties for noncompliance. These measures are intended to overcome decades of the perceived underbuilding and restrictive zoning within cities, yet their cumulative effect has been to create unnecessary local government costs, confusion, inequity, and growing tension between state directives and local realities. All of these efforts have led to minimal housing being built.

In Orange County, a region defined by diverse cities, established neighborhoods, and distinct infrastructure constraints, as well as environmentally sensitive areas, these Housing Mandates operate as a one-size-fits-all system poorly suited to local conditions. Housing targets are derived from opaque formulas, that fail to account for land costs, land availability, funding limitations, labor shortages, construction costs, infrastructure capacity and accurate population projections. Without corresponding investments in transit, utilities, schools, parks, public safety, and affordable housing subsidies, the Housing Mandates themselves are largely impractical and difficult to achieve. In addition, because of the financial infeasibility of building low-income housing without subsidies, cities must approve developments with higher density to pay for and meet the affordable housing requirements. As a result, local cities face mounting pressure to comply with requirements that often lack economic and logistical feasibility.

The dissolution of local redevelopment agencies in 2012 eliminated a primary mechanism for financing and managing affordable housing at the local level. In response, the State layered new housing requirements through the Housing Mandates onto cities and counties without restoring comparable funding tools or infrastructure support. Although these laws are framed as solutions to homelessness and affordability, they have in fact caused unintended consequences that have not produced incremental housing production. This is primarily due to regulatory complexity, limited subsidies, and heavy reliance on private market forces. Over time, repeated legislative interventions to solve these challenges have only expanded state authority. This leaves local governments with fewer resources and diminished control.

Housing Mandates have significantly eroded local land-use authority, supplanting community-based planning with rigid, top-down rules. Residents experience a loss of

meaningful input; even as local officials remain legally responsible for compliance. Streamlined approvals frequently bypass public hearings and local design standards, shift liability to cities, and prioritize building over neighborhood character. The practical elimination of traditional single-family zoning and the widespread upzoning of existing neighborhoods threaten longstanding community character while limiting local oversight of height, density, parking, and environmental resilience.

The Southern California Association of Governments (SCAG) determines the RHNA housing allocation for most of Southern California. Within this framework, the Orange County Council of Governments (OCCOG) serves as the County's representative to SCAG in the RHNA process. The RHNA methodology and resulting allocations have been widely criticized as unrealistic, inequitable, and insufficiently transparent.¹ OCCOG's level of influence with SCAG is critical to regional planning outcomes. OCCOG needs substantial funding increases to better advocate in Sacramento and within SCAG to support OC jurisdictions.

Given the significant challenges and inequitable housing allocations experienced during the current RHNA 6th Cycle (2021-2029), it is imperative that Orange County begin strategic preparation for the upcoming 7th Cycle (2029-2037) process. Proactive planning will strengthen the County's ability to advocate within SCAG for fair, data-driven, and achievable housing allocations in the next cycle.

This report examines how Housing Mandates operate in practice within Orange County, and how well-intended legislation has produced unintended consequences for cities, neighborhoods, and local governance. It evaluates the feasibility, effectiveness, and equity of current state policies, and highlights the growing disconnect between mandated housing goals and the capacity of communities to absorb them responsibly. The report underscores the need for housing solutions that respect local conditions, restore meaningful public participation, and align development goals with infrastructure, funding, and community priorities.

BACKGROUND

California continues to experience some of the highest housing prices and rents in the nation, while some say housing production has not kept pace with population and employment growth². State policymakers have concluded that fragmented local decision-making, restrictive zoning practices, and lengthy approval processes, have

¹ [New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf](#)

² [California Housing in 2025 - Advocacy - California Chamber of Commerce](#)

contributed to this imbalance³. In response, the California Legislature has pursued a more centralized and enforceable approach to housing policy such as Senate Bill (SB)9, SB10, SB35, SB79, SB131, SB330, and Assembly Bill (AB)1050, AB2011(see Appendix A), shifting significant authority from local jurisdictions to the State. Since 2017, the California Legislature has enacted more than one hundred housing-related bills designed to establish clearer production expectations, reduce procedural delays, and strengthen enforcement mechanisms for jurisdictions that do not comply with state housing requirements.

The Housing Element Law (Government Code 65580-65589.11), originally adopted in 1969, remains the foundation of California’s housing policy. The law requires every city and county to prepare a Housing Element as part of its General Plan that identifies how the jurisdiction will meet the housing needs of all income groups.⁴ The RHNA process implements these Housing Mandates by assigning each jurisdiction a specified number of housing units—categorized by income level. Compliance is tied to eligibility for state housing and transportation funding, creating substantial financial implications for the County of Orange and its 34 municipalities.

Zoning has long been a cornerstone of local government authority, guiding development, and shaping the physical form of cities.

First introduced in the late nineteenth and early twentieth centuries to address public safety concerns, zoning has since expanded into a sophisticated regulatory system governing land use, building height, setbacks, lot coverage, density, and numerous other development standards. These tools enable local governments to align growth with infrastructure capacity, environmental constraints, and long-term planning objectives, while simultaneously delivering broad public benefits. In addition to protecting public health and safety by distancing residential areas from heavy industrial activities and ensuring reliable emergency access, zoning helps preserve neighborhood character and property values. It also supports community cohesion by balancing residential, commercial, and civic uses, and guides growth in ways that correspond with available public services and facilities. Moreover, zoning plays a vital role in safeguarding environmentally sensitive areas and reducing exposure to wildfire risks, underscoring its enduring importance as a foundational instrument of urban planning.

In recent years, traditional zoning practices have been subject to increasing scrutiny. Critics argue that low-density zoning and land-use restrictions have contributed to housing shortages, affordability challenges, socioeconomic segregation,

³ [In California, statewide housing reforms brush against local resistance | Brookings](#)

⁴ [New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf](#)

automobile-dependent development, and exclusionary housing patterns.⁵ Housing advocates, civil rights organizations, and some policymakers have cited these concerns as justification for significant state intervention and reform of local land-use authority.⁶

State leaders have relied on these critiques to support a series of Housing Mandates that expand the State's role in local planning decisions. These measures prioritize increased housing production as the central response to the State's affordability challenges. The underlying assumption is that a significant increase in supply will help reduce housing costs. However, historical data reviewed by the 25-26 Orange County Grand Jury (OCGJ) indicate that periods of high housing production in Orange County, including during the 1990s, did not consistently result in improved affordability.⁷ This suggests that housing affordability is influenced by multiple factors other than housing supply, including land values, construction costs, wages, and regional economic conditions.

The dissolution of redevelopment agencies in 2012 further altered the local housing landscape. Redevelopment agencies had served as a significant source of financing for affordable housing and community revitalization projects through tax-increment financing and state-authorized planning powers. Their elimination removed a key funding mechanism for cities and counties.⁸ In subsequent years, the State imposed additional Housing Mandates without restoring revenue sources, leaving jurisdictions and builders responsible for meeting expanded obligations with reduced financial capacity.

The current generation of State Housing Mandates (6th Cycle) reflects multiple statewide policy objectives. Early legislative proposals referenced a goal of constructing approximately 3.5 million new housing units; later that figure was reduced to approximately 2.5 million units.⁹ Despite these goals, statewide production continues to fall short of identified need. To address this, state housing legislation has emphasized increased zoning density, reduced discretionary review, expanded ministerial approval pathways, strengthened density bonus incentives, and increased requirements for jurisdictions to facilitate affordable housing in lieu of government subsidies. Additional measures focus on locating new housing near employment centers and transit corridors to reduce commute times and greenhouse gas emissions.¹⁰

⁵ [National Low Income Housing Coalition - Land Use Restrictions and Affordable Housing](#)

⁶ [Fixing California's housing shortage requires new policy and new politics - Berkeley Economy & Society Initiative](#)

⁷ [Court Agrees Anaheim Violated State Law. Decision is a Big Win for Fair Housing in California | California Department of Housing and Community Development](#)

⁸ [California Post-RDA Affordable Housing Developer Survey: Analysis of Results - San Francisco Fed](#)

⁹ [New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf](#)

¹⁰ [California State Senate Recent Legislative Actions](#)

Collectively, these policies mark a significant shift in California’s approach to land-use governance. While intended to address housing shortages and affordability concerns, they have also raised questions regarding feasibility, infrastructure capacity, public engagement, and the long-term effects on established communities. These issues are particularly relevant in Orange County, where many cities are fully built out, constrained by environmental concerns, geography, and infrastructure limitations, and seeking to balance statutory obligations with community priorities and public expectations. The impact on Orange County and its 34 cities in meeting these Housing Mandates deserves intense scrutiny.

REASON FOR STUDY

The expansion of Housing Mandates has provoked public awareness and challenged local governments. Media coverage has grown, reflecting divergent viewpoints regarding the Housing Mandates’ effectiveness, equity, and long-term consequences. Cities across Orange County have responded in a variety of ways, adopting compliance strategies that differ widely in breadth, transparency, and community engagement. Residents have expressed a similarly broad range of perspectives, from support for expanded housing opportunities to concerns regarding neighborhood impacts, infrastructure strain, loss of local control, and limitations on public participation in land-use decision-making.

Housing Mandates have the potential to significantly reshape the character of Orange County Communities.

Beyond requiring increased zoning density and higher residential densities, the Housing Mandates influence demographic patterns, neighborhood character, transportation systems, public services, and environmental concern. Local jurisdictions must absorb these impacts without corresponding state investment in infrastructure, affordable housing subsidies, or restoration of tools previously used to manage growth, such as redevelopment agency financing.

Given these conditions, this report attempts to evaluate both the intended and unintended consequences of Housing Mandates as they are applied within Orange County. It will identify where state requirements may conflict with local capacity and community needs and assess how recent legislative changes have shifted the balance between state authority and local governance. In addition, this report seeks to establish a strategic framework for influencing future housing allocations within SCAG by strengthening the role and effectiveness of OCCOG as we move into the next planning phase.

METHOD OF STUDY

In conducting this study, the OCGJ employed a multi-method approach designed to gather information from a broad range of governmental, professional, construction industry, and community perspectives. The methodology included research, interviews, observational site visits, document review, surveys, and participation in relevant public forums. This comprehensive approach allowed the OCGJ to evaluate how Housing Mandates are interpreted, implemented, and experienced across Orange County jurisdictions.

Research

The OCGJ conducted extensive background research using publicly available sources, including:

- Governmental and agency websites
- Online news and media sources
- Local and Community news outlets

Interviews

The OCGJ conducted interviews with representatives from the following organizations and groups:

- City leadership from multiple Orange County cities
- Sitting and former city officials
- Orange County Council of Governments (OCCOG)
- Orange County Public Works – Development Services
- Orange County Housing & Community Development
- Local housing program administrators
- American Institute of Certified Planners (AICP) – housing specialists
- Private-sector builders and development professionals

Observations and Site Visits

OCGJ members conducted guided site visits and observations of housing and mixed-use developments, including:

Multiple retail and housing developments (market rate, affordable and low income) in:

- Huntington Beach
- Midway City
- Anaheim
- Santa Ana
- Westminster
- Irvine

- San Juan Capistrano

Public Forums and Events

The Members of the OCGJ attended:

- The 2025 Chapman Economic Forecast
- Newport Beach Community Forum
- Foothills Neighborhood Association Town Hall

Government Meetings

The Members of the OCGJ attended:

- Orange County Board of Supervisors
- Orange County Council of Governments (OCCOG)
- Technical Advisory Committee (TAC), a subcommittee of OCCOG
- Monitored City Council meeting within the County

Document Review

- Complaints and correspondence submitted by Orange County residents.
- Community Development Records from applicable jurisdictions

City Survey

The OCGJ developed and distributed written survey questions to Orange County cities to gather information concerning:

- Housing Element compliance strategies
- Local responses to Housing Mandates
- Community engagement processes
- Infrastructure and resource constraints

INVESTIGATION AND ANALYSIS

State Housing Mandates and Local Implementation

The Housing Mandates, through the laws approved by the California Legislature, have pursued a more centralized and enforceable approach to housing policy (Appendix A), shifting significant authority from local jurisdictions to the State. Since 2017, the California Legislature has enacted more than one hundred housing related bills, designed to establish clearer production expectations, reduce procedural delays, and strengthen enforcement mechanisms for jurisdictions that do not comply with state housing requirements.

California's housing statutes are not aspirational guidelines; they carry the force of law and impose affirmative legal obligations on local jurisdictions. Cities are therefore required to plan for, accommodate, and in many cases, approve housing development consistent with Housing Mandates, regardless of local political preferences, historic planning practices or public consensus.

According to California State policy guidance, the Housing Mandates are intended to address decades of housing underproduction that state policymakers identify as contributing to rising housing costs, overcrowding, displacement, reduced economic mobility and a lack of affordable housing.¹¹ From the State's perspective, reliance on regional and local discretion has not consistently generated housing at levels necessary to improve affordability, particularly for lower and moderate-income households.¹² In response, the California Legislature and HCD have adopted a compliance driven model designed to ensure that every jurisdiction contributes to meeting statewide housing needs.

Orange County cities differ significantly. The OCGJ's investigation focused on areas where the state's rapidly evolving legislative requirements conflicted with local zoning practices, infrastructure constraints, and past practices. It also examined how recent statutory reforms shifted authority away from local jurisdictions toward state oversight and enforcement, reshaping the governance methodology and altering both the practical and legal responsibilities of cities.

Within this context, this report does not question whether cities must comply with state housing law—they must—but rather this report's objective is to assist Orange County jurisdictions and the public in understanding the framework within which they operate and enhance the possibility of good planning practices and design. During interviews, city officials and builders described to the OCGJ the benefits of citizen engagement, proactive and early coordination on planning, realistic site inventories, and timely engagement with state agencies to avoid punitive actions.

Public communication and civic education is essential. Several Orange County cities reported undertaking efforts to engage residents and explain how the Housing Mandates affect local decision-making authority, including reductions in traditional zoning discretion. Transparent public outreach was identified as an important practice for maintaining community trust and managing expectations in an era of constrained local control.

Through interviews, document review, site observations, and comparative analysis, several key themes emerged and are expanded on below:

¹¹ [Statewide Housing Plan](#)

¹² [California Legislative Analyst's Office - California Housing](#)

- Environmental Context and CEQA
- RHNA Process
- RHNA Challenges
- Penalties of Not Having an Approved HCA Housing Element
- Penalties for Not meeting Approved Housing Plan
- Feasibility of Housing Mandate in Orange County
- One Size Does Not Fit All
- California and OC Population Trends
- 6th Cycle Housing Allocations in OC
- City Challenges
- 7th Cycle Concerns

Environmental Context and CEQA

In 1970, California enacted the California Environmental Quality Act (CEQA) with broad legislative support. These are the broad body of environment laws that attempt to protect California's environment¹³. Its core purpose is to ensure that state and local government agencies identify and publicly disclose the environmental impacts of proposed projects before approving them.¹⁴ Importantly, CEQA does not prohibit development; it ensures development is done responsibly, with environmental protections, public notice, and accountability. It has played a key role in shaping California's environmental standards for over five decades. Yet recent housing laws are chipping away at these hard-won environmental protections and may put our environment at risk.

Over time, the California Legislature has adopted amendments intended to streamline housing projects. Several interviewees asserted that recent statutes—including A130 and SB131—have the effect of narrowing CEQA's environmental review for qualifying housing projects by expanding ministerial or exempt pathways¹⁵. Before CEQA and the Federal Clean Air Act, Southern California experienced severe air pollution, with the region enduring over 200 days each year of unhealthy ozone levels.¹⁶ In the 1970s, this led to frequent smog alerts and restrictions on outdoor activity for vulnerable residents¹⁷. Longtime residents recall this period as one when smog was so persistent it regularly obscured visibility and affected daily life. Today, air quality in Southern California is dramatically improved, with far fewer unhealthy-air days due to decades of

¹³ [PPIC Statewide Survey: Californians and the Environment - Public Policy Institute of California](#)

¹⁴ [South Coast Air Quality Management District - CEQA](#)

¹⁵ [California Lawmakers Approve Major Overhaul of Landmark Environmental Law | KQED](#)

¹⁶ [How Los Angeles Began to Put its Smoggy Days Behind | History & Society | PBS SoCal](#)

¹⁷ [Los Angeles Historical Air Quality Analysis: AQI, PM, CO, SO2, NO2, O3](#)

CEQA measures that have collectively transformed the air basin and made local conditions significantly cleaner and healthier than during the smog-filled 1970's.¹⁸



A smoggy aerial view of downtown Los Angeles in January 1975.

Polling in California consistently shows strong public support for environmental protection, though some surveys also indicate support for regulatory changes aimed at increasing housing production and lowering costs.¹⁹

Recent laws have made it simpler to construct housing by scaling back environmental controls.²⁰ While this may accelerate development, it also threatens to weaken important environmental protections that California has relied on for decades. And importantly, there is no guarantee that these streamlined projects will provide affordable homes or meaningfully improve the housing crisis.

¹⁸ [How Los Angeles Began to Put its Smoggy Days Behind | History & Society | PBS SoCal](#)

¹⁹ [PPIC Statewide Survey: Californians and the Environment - Public Policy Institute of California](#)

²⁰ [In California, statewide housing reforms brush against local resistance | Brookings](#)

Regional Housing Needs Assessment Process

RHNA is the State mandated process that determines the number of new housing units across various income levels that each city and county must plan for each 8-year cycle.²¹ It requires local governments to zone adequate land to meet projected regional housing needs.²² RHNA is implemented through the HCD whose mission statement emphasizes safe, affordable homes and sustainable communities.²³

The RHNA process begins with HCD's review of household growth projections to estimate future housing needs by region. The California Department of Finance shares demographic projections with regional planning bodies known as Councils of Governments (COGs). These projections form the basis for RHNA determinations among California regions, and each COG then develops suballocations for counties and cities within its jurisdiction. Each city is required to update a Housing Element as part of its General Plan, describing objectives, programs, and housing sites consistent with RHNA goals. In recent years, the California Legislature has enacted statutes expanding HCD's authority in reviewing and enforcing RHNA related plans.²⁴

SCAG is the largest COG in the State which includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG represents 197 jurisdictions across more than 38,000 square miles. SCAG develops RHNA allocations for its member jurisdictions and also engages at the state level on issues relevant to regional planning, including housing legislation.²⁵

OCCOG, established as a joint power's agency in 1996, serves as a representative of Orange County to SCAG on RHNA planning (and other issues, i.e., transportation). The organization emphasizes collaboration, transparency, and consistent advocacy to ensure Orange County's interests are effectively represented in regional planning, areas where the OCGJ has identified deficiencies.²⁶

OCCOG's charter describes it as a voluntary advisory association of local governments seeking sub regional and regional planning, coordination, and technical assistance on issues of mutual concern. OCCOG has an Executive Director and minimal staff. A member of the Orange County Board of Supervisors serves on the OCCOG Board and is the SCAG representative for the County of Orange.²⁷

²¹ [California Housing Element Law Explained – Legal Clarity](#)

²² [The California State of Real Estate - Realtor.com Economic Research](#)

²³ [Welcome to HCD! | California Department of Housing and Community Development](#)

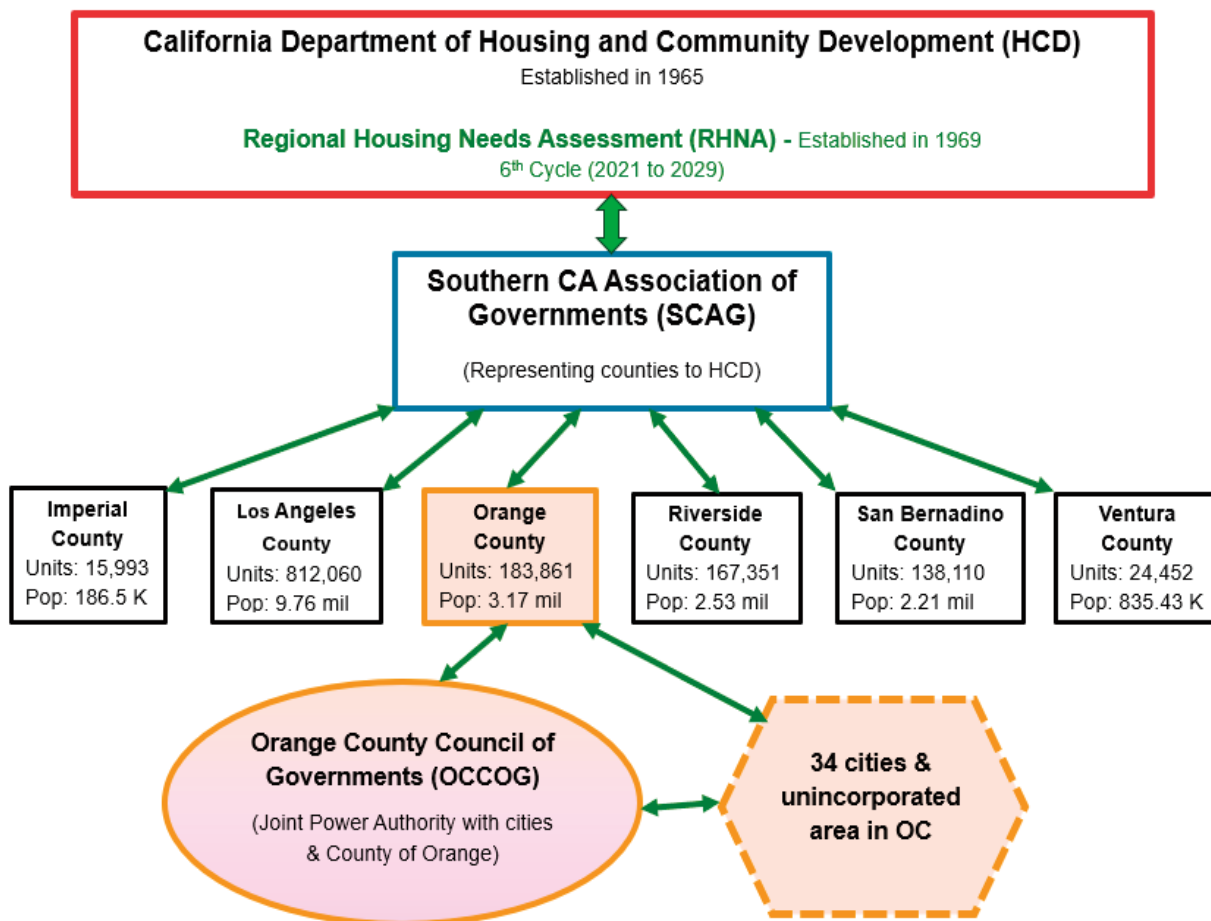
²⁴ [Enforcement Authority | California Department of Housing and Community Development](#)

²⁵ [About us | Southern California Association of Governments](#)

²⁶ [Orange County Council of Governments](#)

²⁷ [Orange County Council of Governments](#)

RHNA PROCESS



SCAG adopted its 6th Cycle housing allocation plan for the period of October 2021 through October 2029. The plan assigns 1,341,827 additional housing units across the SCAG region—which includes most of Southern California—and distributes those units among cities and unincorporated areas, including those in Orange County.²⁸

Stakeholders reported that the 6th Cycle methodology resulted in a significant housing unit increase compared with the 5th Cycle allocation to SCAG of 411,953 units; representing approximately a 300% increase. The dramatic increase prompted the municipalities to request reviews and appeals of their assigned housing requirements. In response, HCD cited multiple reasons for the regional increases including unit overcrowding, affordability indicators, the ongoing effects of previously unbuilt housing units during the 2008 recession and the statutory adjustment factors under California Government Code § 65584.01 (statutory formula)²⁹

²⁸ [Southern California COG Regional Housing Need Determination](#)

²⁹ [Southern California COG Regional Housing Need Determination](#)

Summarized are the five objectives that the COGs (i.e. SCAG) must further in their allocation methodology (Gov. Code § 65584(d)).³⁰

- Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, resulting in allocations for low and very low-income households, and providing for extremely low and acutely low-income allocations within the range prescribed by statute
- Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, encouraging efficient development patterns, and achieving greenhouse gas reduction targets pursuant to Government Code section 65080.
- Improving the intraregional relationship between jobs and housing, including balance between low wage jobs and housing affordable to low wage workers.
- Allocating a lower proportion of housing need to an income category where a jurisdiction already has a disproportionately high share of households in that category relative to the countywide distribution.
- Affirmatively furthering fair housing.

These objectives are intended to support more economically diverse communities by assigning housing to high resource, job rich areas and by encouraging infill development while protecting environmental resources (CEQA).³¹ RHNA assigns targets to each jurisdiction by income category. For the 6th Cycle, the four income categories are: Very Low ($\leq 50\%$ of county median income), Low (50–80%), Moderate (80–120%), and Above Moderate ($\geq 120\%$)³². Through HCD and RHNA, California instructs and enforces compliance with specific housing targets.

Regional Housing Needs Analysis Challenges

The cities' leadership in Orange County offered multiple critiques of RHNA, including: (1) allocation methodology at SCAG does not reflect local housing need, (2) concerns of fairness in allocation across jurisdictions, (3) the appeal process to SCAG by local governments were consistently denied, and (4) assigned housing goals do not consistently translate into actual permitting, especially for lower income households.³³ HCD has stated that RHNA goals should not be interpreted as a production forecast but

³⁰ [California Department of Housing and Community Development |](#)

³¹ [The 5 Statutory Objectives of the RHNA Methodology](#)

³² [State Housing Law Program | California Department of Housing and Community Development](#)

³³ [Best Practices for Allocating & Evaluating RHNA](#)

as a planning objective.³⁴ Even with this planning objective, Orange County jurisdictions reported significant operational and fiscal challenges associated with implementation.

Jurisdictions described resource constraints that affect their ability to implement the Housing Mandates consistent with legislative intent, including staffing limitations, the need for specialized consultant support, and budget constraints. Several cities characterized RHNA determination and compliance as complex and costly. Some cities reported spending hundreds of thousands of dollars (sometimes reaching close to \$1,000,000) to meet the reporting mandate. Taxpayer money spent on planning does not directly result in the construction of housing units.

Interviewees also reported that SCAG's approved methodology is complex and difficult for elected officials to communicate their housing allocation and ultimate Housing Element to their constituents. HCD and SCAG should take steps to improve the RHNA processes, including enhancing communication transparency and simplifying data driven methodologies. Additionally, recognizing the compliance costs to taxpayers cannot be left unaddressed even as the 7th Cycle planning is currently underway.

In October 2021, the California State Joint Legislative Audit Committee approved an emergency audit of HCD's regional determination process, citing limited public visibility of calculation methods and a need for independent review.³⁵ Further, the audit identified errors in certain data calculations and raised concerns³⁶. The California State Auditor subsequently issued findings that criticized aspects of HCD's methodology indicating potential inflation of requirements by a substantial number of housing units.³⁷ Some of the cited errors included the use of very outdated and inaccurate vacancy factor rates³⁸. One report even suggests base information used was from the 1980's³⁹. Others reported that HCD relied on population projections that differed from California Department of Finance forecasts, which generally show relatively modest long-term growth, and instead used assumptions that resulted in significantly higher projected housing needs.⁴⁰ HCD's response, to the California State Auditor, and on their website, acknowledged there was room for improvement and addressed the allocation criticisms in very general terms but did not mention that the numbers had been or would be corrected.⁴¹

³⁴ [New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf](#)

³⁵ [California Auditor Report 2021-125](#)

³⁶ [California Auditor Report 2021-125](#)

³⁷ [More Homes, Hardly Any Population Growth—So Why Is California Still So Expensive?](#)

³⁸ [CA Auditor Bashes State's Mandated Housing Numbers, Says Process Is Flawed, Lacks Oversight](#)

³⁹ [CA Auditor Bashes State's Mandated Housing Numbers, Says Process Is Flawed, Lacks Oversight](#)

⁴⁰ [Court: 'Regional Housing Need' Determinations Aren't Judicially Reviewable - Davis Vanguard](#)

⁴¹ [California State Auditor - Report 2021-125 Recommendation 3 Responses](#)

Separately, in June 2021, OCCOG, on behalf of the Orange County cities, filed a judicial challenge to HCD's regional housing determination, arguing that HCD failed to follow statutory requirements in developing the RHNA allocation.⁴² The trial court dismissed the petition in November 2021, and the Second District Court of Appeal affirmed that dismissal in July 2023, holding that neither OCCOG nor its member cities could challenge HCD's methodology.⁴³ On August 24, 2023, the OCCOG Board authorized counsel to petition the California Supreme Court for review, but the Court denied the petition on October 11, 2023, effectively ending OCCOG's legal challenge.⁴⁴ During the 6th Cycle process, SCAG received 48 appeals from cities challenging their housing allocation within their 45-day appeal period. After SCAG's review, they quickly denied 47 of them.⁴⁵ This demonstrates limited jurisdictional influence over the allocation and appeal process. This series of rulings confirms that HCD's statutory authority has been upheld by the courts, and that any changes sought by local jurisdictions may be addressed better through the legislative process rather than litigation.

Penalties for Not Having an HCD-Approved Housing Element

A city that fails to obtain certification of its Housing Element from the HCD is considered out of compliance with state Housing Element Law and becomes subject to a range of escalating enforcement actions.⁴⁶ HCD's Housing Accountability Unit (HAU) has authority to initiate enforcement, including referral to the California Attorney General for legal action when a jurisdiction does not meet statutory planning requirements.⁴⁷ When a city is out of compliance, it can be exposed to severe statutory penalties, such as lawsuits by the Attorney General or outside entities, court-imposed fines ranging from \$10,000 to \$600,000 per month, and court orders that may mandate project approvals, require rezoning, suspend a city's authority to issue building permits, or even strip the city council of land-use authority until compliance is achieved.⁴⁸

The most concerning and widely known consequence of noncompliance is the Builder's Remedy, which restricts a city's ability to deny qualifying housing projects even when they conflict with the city's General Plan or zoning rules.⁴⁹ Under this provision, developers may propose larger, denser projects that bypass local zoning controls if at least 20% of the units are affordable to low-income households or if the project is 100%

⁴² [OCCOG Press Release HCD](#)

⁴³ [Orange Cnty. Council of Gov'ts. v. Velasquez - vLex United States](#)

⁴⁴ [Orange County Council of Governments](#)

⁴⁵ [Orange County Council of Governments](#)

⁴⁶ [Analysis Finds Davis Not on Track to Meet Housing Requirements without Approval of Two Voter Projects - Davis Vanguard](#)

⁴⁷ [Analysis Finds Davis Not on Track to Meet Housing Requirements without Approval of Two Voter Projects - Davis Vanguard](#)

⁴⁸ [Housing Open Data Tools | California Department of Housing and Community Development](#)

⁴⁹ ["Builder's Remedy" Reform Bill Approved by Governor Newsom | Allen Matkins](#)

moderate-income.⁵⁰ Cities without a compliant Housing Element lose their ability to regulate these projects through their typical zoning constraints unless they can demonstrate specific, adverse health or safety impacts.⁵¹ Additional consequences include loss of access to key state funding sources and being placed on a shorter four-year Housing Element update cycle rather than the standard eight-year schedule.⁵²

As of this writing, some Orange County cities—such as Huntington Beach and Seal Beach—have not yet obtained certification of their Housing Elements for the 6th Cycle or have been subject to enforcement actions related to noncompliance, while others, such as Costa Mesa, have only achieved compliance after delays and state intervention.⁵³

Penalties for Not Meeting Housing-Plan Construction Goals

While RHNA production targets are planning requirements, not actual construction mandates – cities may face meaningful consequences if they fail to implement the programs and rezoning commitments included in their certified Housing Elements. HCD's HAU monitors compliance with both Housing Element commitments and state housing laws, and violations may prompt enforcement letters, monitoring actions, or legal referrals to the Attorney General.⁵⁴ Courts have shown a willingness to override local discretion when a city's failure to implement its Housing Element prevents the jurisdiction from accommodating its assigned RHNA allocation.⁵⁵ In some cases, courts may mandate rezoning, invalidate local development restrictions, or require approval of specific projects to ensure that adequate housing capacity is created.⁵⁶

Feasibility of Housing Mandate in Orange County

The feasibility of California's Housing Mandates in Orange County raises significant practical concerns. HCD, during the 6th Cycle, has allocated 183,161 housing units to Orange County to be constructed by 2029 with 30% being considered 'affordable'. However, according to the US Census Bureau, Orange County is only producing an average of 5,000 units a year over the past 5 years.⁵⁷ Clearly this is a dilemma for the County. While it is relatively easy for the California Legislature to pass ambitious housing laws, the actual construction of these units is far more challenging. The Housing Mandates may be well-intentioned but translating them into real-world development is complex, due to constraints in land availability and costs, infrastructure

⁵⁰ [Builder's Remedy Primer](#)

⁵¹ [The Builder's Remedy and Housing Elements](#)

⁵² [Housing Elements | California Department of Housing and Community Development](#)

⁵³ [Appeals Court Orders Huntington Beach to Comply with State Housing Law - Davis Vanguard](#)

⁵⁴ [Enforcement Process | California Department of Housing and Community Development](#)

⁵⁵ [Appeals Court Orders Huntington Beach to Comply with State Housing Law - Davis Vanguard](#)

⁵⁶ [Appeals Court Orders Huntington Beach to Comply with State Housing Law - Davis Vanguard](#)

⁵⁷ [Index of /programs-surveys/popest/tables](#)

capacity, high construction and labor costs, community acceptance, and capital formation.

Capital formation for housing development in Orange County faces significant challenges. The cost of capital remains high, and the long timeline required to entitle, build, and eventually generate revenue increases financial risk for developers. Interest-rate volatility further complicates financing, affecting both equity investment and construction loan terms. At the same time, affordable housing projects often struggle to qualify for limited government subsidies, leaving many developments financially infeasible. These pressures are intensified in Orange County, which has some of the highest land and construction costs in California, making lower-income housing especially difficult to deliver without substantial public support.^{58 59 60 61}

Most parts of Orange County are already built out, leaving limited land available for new development. Substantial portions of the remaining undeveloped areas are further constrained by coastal regulations, floodplains, wildfire-prone zones, steep hillsides, protected open space, and other environmentally sensitive lands. These physical and regulatory barriers significantly reduce the amount of land that can realistically be developed. At the same time, the County faces substantial infrastructure limitations—including constraints on water and sewer systems, road capacity and traffic circulation, parking availability, schools, parks and recreation space, transit corridors, and even utilities such as electricity and natural gas. Taken together, these constraints sharply limit how much additional housing can be accommodated, even when zoning or Housing Mandates call for higher densities.

High construction costs remain a major obstacle to new housing production, driven by escalating prices for essential building materials such as lumber, steel, concrete, and electrical components. Persistent labor shortages across skilled trades further compound these costs, as limited labor supply leads to higher wages and project delays. Appliance costs have also risen significantly, especially for energy-efficient or higher-end models now commonly required by building codes or market expectations. Additionally, the desired level of luxury or finish, such as premium flooring, countertops, fixtures, and community amenities, can substantially increase overall project budgets, making even modest housing developments expensive to deliver.

Reports indicate it cost approximately \$500,000 to \$800,000 to build a one-bedroom low-income rental unit in Orange County. Low Income units require rental subsidies.

⁵⁸ [Turner Center UC Berkeley Development Math](#)

⁵⁹ [Interest Rates Impact Construction Project Funding](#)

⁶⁰ [CHP State Housing Needs Report](#)

⁶¹ [The High Cost of Producing Multifamily Housing in California: Evidence and Policy Recommendations | RAND](#)

With declining federal, state, and local funding subsidies, it is difficult to build affordable housing. Developer interest therefore is focused on market rate housing production.

In short, Housing Mandates are legally binding, yet remain extraordinarily difficult for many cities to achieve. While RHNA serves a key role as a planning tool, requiring cities to zone for additional housing and align local policies with statewide objectives, meeting the full scale of assigned housing targets, especially for lower-income households, is often unrealistic without sustained public funding, expanded infrastructure, and ongoing State support. In practice, the Housing Mandates alone do not produce homes. Achieving HCD/SCAG goals in Orange County ultimately depends on market-responsive policies, and complementary funding strategies. It is not simply higher numerical requirements or punitive measures.

In practice, Housing Mandates alone do not build homes.

One Size Does Not Fit All

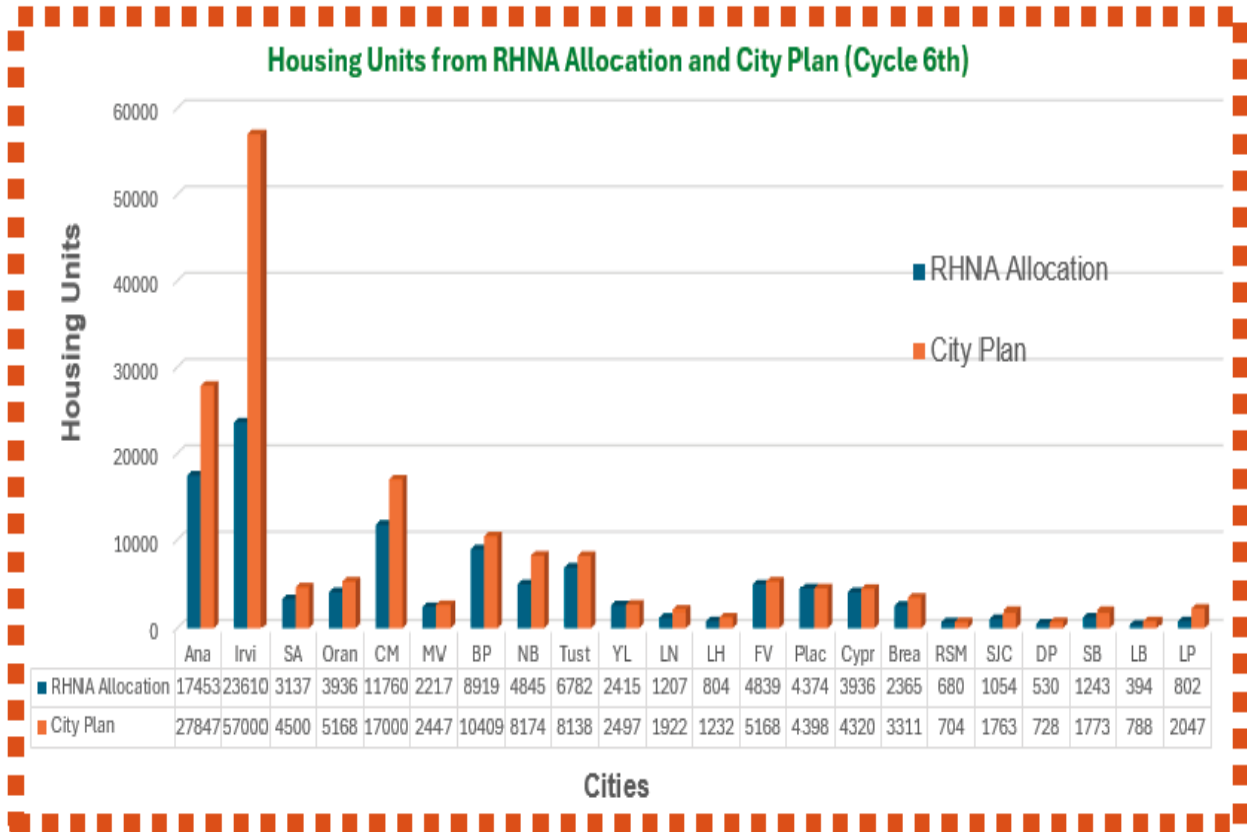
California's statewide Housing Mandates are intended to address a persistent and perceived shortage of housing.⁶² However, the OCGJ found that the uniform statutory framework governing the RHNA process can function as a blunt instrument when applied across jurisdictions with widely differing conditions. City leadership consistently noted that a one-size-fits-all approach may not fully account for the unique character, environmental, infrastructural, economic, demographic, and geographic circumstances facing individual communities.

Several stakeholders noted that the RHNA process does not adequately differentiate among jurisdictions with varying levels of infrastructure capacity, longstanding physical or environmental constraints, or distinct development patterns. In particular, it fails to account for older, largely built-out cities—such as Garden Grove, Westminster, La Habra, and Fountain Valley, where available land is minimal and new housing can occur primarily through infill development. In these contexts, construction is typically more complex and costly, further challenging feasibility. As a result, some local governments face disproportionate burdens in accommodating housing allocations that do not fully reflect on-the-ground constraints and local conditions.

The OCGJ notes that perspectives on this issue varied considerably. Interviewees from fast-growing or infrastructure-rich areas were more likely to support uniform standards, arguing that consistent requirements prevent jurisdictions from avoiding their fair share of housing obligations. Others expressed the view that Housing Mandates are necessary to overcome decades of underproduction and local resistance to growth.

⁶² [California Department of Housing and Community Development | California Department of Housing and Community Development](#)

Ultimately, comments on the adequacy and fairness of California's uniform approach depended heavily on local context and a jurisdiction's capacity to absorb additional housing.



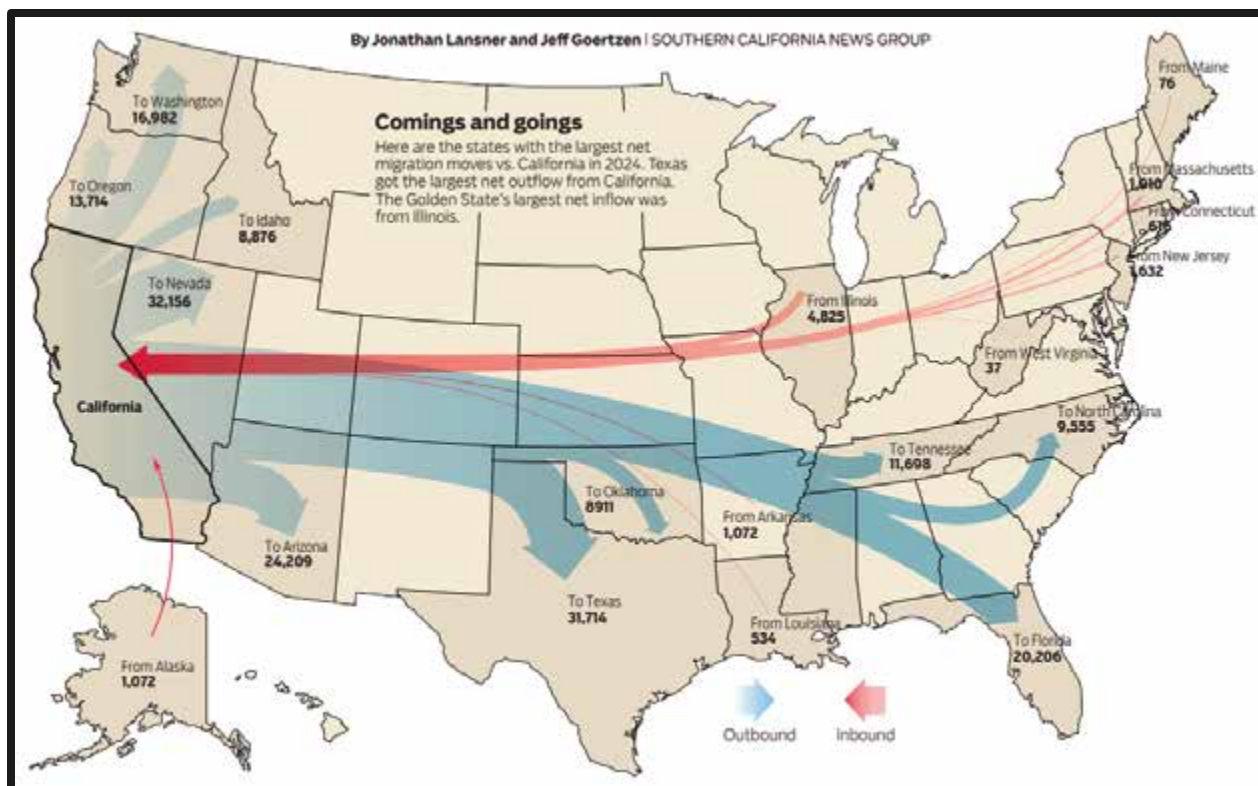
Data source: Cities' responses to the 2526 Grand Jury's survey

California and Orange County Population Trends

Over the past three decades, California has undergone a profound demographic shift. After more than a century of rapid population expansion (growing from under 20 million in 1970 to nearly 40 million by 2020) the State's growth has slowed dramatically, and in recent years has turned negative.⁶³ According to the Public Policy Institute of California, California lost 322,000 residents between July 2020 and July 2022 due largely to emigration, declining births, and reduced immigration.⁶⁴ And although modest growth resumed between 2022 and 2025, the overall trend remains flat and well below historical norms. As previously noted, this validates the California State Auditor's criticism of HCD, and its projections based on population.

⁶³ [CSUF - Center for Demographic Research](#)

⁶⁴ [California's Population - Public Policy Institute of California](#)



Source Orange County Register ⁶⁵

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Historically, one of California's fastest-growing regions, Orange County, exhibits similar trajectories – population stagnation and decline. The U.S. Census Bureau has documented recent population decreases, noting that Orange County's long-standing growth pattern began to reverse in the early 2020's due in part, to an aging population, and reduced international migration and increased outmigration.⁶⁶ These trends challenge long-held assumptions about continuous growth in Orange County and suggest that future planning should incorporate demographic stabilization rather than expansion.

Despite these emerging realities, population projections used during the 6th Cycle (2021–2029) relied on pre-pandemic models that assumed continued growth.⁶⁷ HCD's 6th Cycle regional determination began with population forecasts from the Department of Finance and applied upward adjustments for overcrowding, cost burden, and vacancy—factors that significantly inflated the region's housing need calculation. However, by 2020–2025, many of these underlying drivers shifted in the opposite direction as

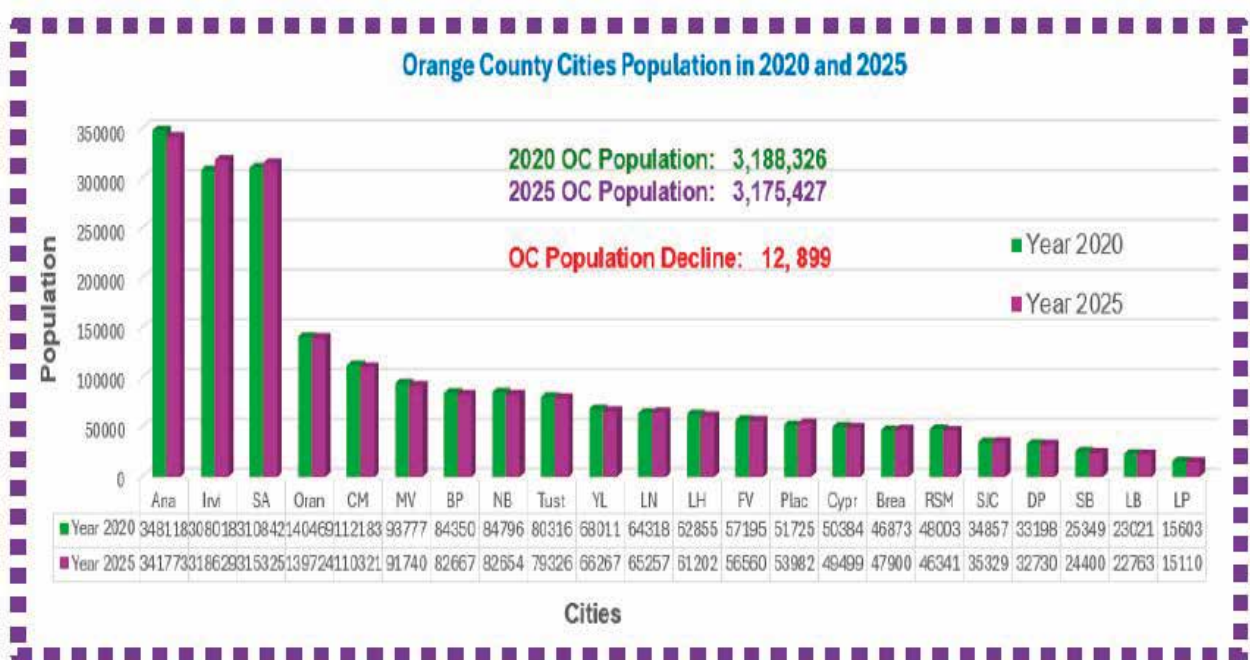
⁶⁵ [Infographic: Are people leaving California? Here's what the numbers show us – Orange County Register](#)

⁶⁶ [Infographic: Are people leaving California? Here's what the numbers show us – Orange County Register](#)

⁶⁷ [Presentation: Overview of Regional Growth Forecasting, Modeling Task Force May 25, 2022 Meeting](#)

California entered a period of population decline, raising questions about the accuracy of the assumptions embedded in the 6th Cycle projections. SCAG has acknowledged concerns from stakeholders regarding the appropriateness of the population and household growth assumptions used during the 6th Cycle and has initiated discussions with HCD to reform the methodology.⁶⁸

Looking ahead to the 7th Cycle, California's demographic outlook is markedly different from the 6th Cycle. The Department of Finance's newest long-range projections (2024 baseline) show significantly slower statewide and county-level growth through 2070, with some regions, including Orange County, projected to experience prolonged stagnation or decline.⁶⁹ These updated projections, combined with post-2020 population losses, underscore the necessity for HCD and SCAG to recalibrate their methodologies so that the next RHNA Cycle reflects a more accurate and data-driven assessment of true housing need. Without incorporating the State's new demographic trajectory, RHNA risks overestimating future household growth and imposing planning obligations disconnected from both California's and Orange County's actual population realities.



Data source: Orange County Progress Report 2025

Notes: This chart includes only cities, who responded to the 2526 Grand Jury's survey.

6th Cycle (2021–2029) Housing Allocations in OC

California's Housing Element Law requires every city and county to plan for its share of regional housing need. For the 6th Cycle (October 2021–October 2029), SCAG

⁶⁸ [PowerPoint Template for SCAG Presentations](#)

⁶⁹ [Projections | California Department of Finance](#)

assigned the Orange County subregion a total of 183,861 housing units, allocated across four income categories: Very Low, Low, Moderate, and Above Moderate.⁷⁰

While RHNA establishes the minimum number of units each jurisdiction must plan for, this OCGJ finds that cities seeking to meaningfully expand affordable housing production must adopt local housing targets that exceed their RHNA assignment. This is largely because the cost of constructing deed-restricted affordable units—often approaching \$700,000 per unit—is rarely economically feasible without substantial public subsidy, layered financing, and other creative development strategies. As a result, cities increasingly rely on density bonus incentives, allowing developers to build additional market-rate units in exchange for providing affordable units, to help close funding gaps and meet lower-income housing obligations.

The RHNA process begins with the HCD determining the amount of housing needed for each region, including affordability levels, and continues with a regional agency (here, SCAG) dividing that need among counties and cities. SCAG’s final 6th Cycle plan assigns Orange County jurisdictions a combined 183,861 total units for 2021–2029.⁷¹

SCAG’s allocation plan further distributes Orange County’s total to each city (and to the County’s unincorporated area). The largest allocations go to major employment and population centers, with substantial totals assigned to, among others:

<u>City</u>	<u>Units</u>	<u>City</u>	<u>Units</u>
Irvine	23,610	Huntington Beach	13,368
Garden Grove	19,168	Costa Mesa	11,760
Anaheim	17,453	OC Unincorporated	10,340

These totals reflect the regional policy judgment—guided by state objectives—that jurisdictions must plan for additional housing capacity across income categories.

In summary, RHNA 6th Cycle allocations establish minimum planning obligations, but they do not, by themselves, overcome the structural feasibility barriers that constrain low-income housing delivery. This higher target is justified by (1) the anticipated attrition between zoning capacity and constructed projects, and (2) the necessity of leveraging private development to be incentivized to build affordable housing in a market where restricted rents cannot reliably support new construction without layered public assistance.

⁷⁰ [Regional Housing Needs Assessment | Southern California Association of Governments](#)

⁷¹ [Regional Housing Needs Assessment | Southern California Association of Governments](#)

City Challenges

California's increasingly prescriptive Housing Mandates have placed substantial pressure on local governments in Orange County, requiring cities to plan for significantly higher levels of housing capacity. The cumulative effect has been added local government costs, uncertainty in interpreting evolving state requirements, inequities among jurisdictions, and escalating tension between state directives and the longstanding expectation of local control over planning and zoning.

While the State has articulated policy goals and methodology behind its Housing Mandates, the top-down framework often overlooks the essential role of local communities in electing officials to ensure that planning and zoning decisions reflect the values and priorities of the electorate—the very reason most cities incorporated in the first place. This disconnect has contributed to considerable tension, community frustration, and political instability in many Orange County cities, not to mention the constituents' lack of confidence that their elected officials are representing their interests.

To successfully meet the requirement of the Housing Mandates cities must file a Housing Element with HCD every eight years to meet the aggressive targets being mandated. Many local cities lack the internal expertise and staff time to draft such housing submissions and thus must hire costly external consultants to prepare appropriate legal documents. As previously noted, the costs to cities have been between \$100,000 and over \$1,000,000 for some of the larger cities. With 34 cities in Orange County and the County also required to provide a housing plan, the administrative costs are in the millions of dollars just to comply. With many local cities having budgetary challenges, this administrative burden is just another unfunded liability. These taxpayer dollars are spent to comply with the law and have no commensurate direct beneficial outcome for the community.

In Orange County, the Housing Mandates have substantially narrowed local land use discretion while increasing administrative, legal, and compliance risks for cities. Although framed as a planning requirement, the Housing Mandates have expanded residential density and embedded enforceable state oversight into what were traditionally local planning functions. As a result, compliance and enforcement mechanisms have begun to reshape municipal governance and materially influenced developmental patterns across the county. The result of these impacts in Orange County includes but are not limited to the following:

- Reduced local land-use authority
- Administrative and staffing burdens
- Financial expense
- Infrastructure limitations

- Increased legal exposure
- Political and community conflict
- Unfair RHNA housing allocations across the cities

Each city in Orange County has had a variety of challenges based upon differences in geography, fiscal capacity, land availability, funding availability, development interest and conditions, local policy decisions and community responses. The impact of the Housing Mandates has had dramatic impacts and cannot be ignored.

For example:

Anaheim: As the largest (population) city in Orange County, Anaheim has a strong fiscal base, including significant tourist-based revenue, and has already permitted and constructed a large number of housing units especially in light of their massive OC Vibe residential, retail and entertainment district. This is not to say, however, that they do not have their challenges with developers pushing to increase density within Anaheim Hills and the City's concern of density and building into a designated high-fire risk area. Due to its population of over 300,000, unlike most Orange County cities, Anaheim does have access to state and federal dollars, to assist in meeting the affordable housing requirements.

Costa Mesa: Costa Mesa is one of only three Orange County cities still without a compliant Housing Element. Its continued effort to defend local regulations on sober living homes—rules that HCD does not formally recognize—has already cost the city access to certain state low-income housing funding. The situation worsened when one of the City's largest developers withdrew all of his properties from Costa Mesa's Housing Element inventory, slashing projected housing capacity from roughly 17,000 units to the bare minimum of about 11,750 units needed to meet state requirements.⁷² This leaves the City with virtually no buffer to achieve compliance.

Fountain Valley: Fountain Valley is largely built out, with approximately 90% of its land already utilized. Limited available land and constrained financing capacity present major hurdles in Fountain Valley ever being able to meet the state requirements.

Huntington Beach: Huntington Beach has adopted a totally different strategy to address the Housing Mandates. They have aggressively pursued litigation in an effort as a "charter city" to preserve local land-use authority. This approach has resulted in substantial legal costs and financial exposure for the City for noncompliance. The City's

⁷² [Planning Commission Bombshell: Housing Element Update Crisis in Costa Mesa](#)

legal challenges have all been denied including a final appeal to the US Supreme Court.⁷³ Consequences for non-compliance are pending.

Irvine: Irvine's response to the Housing Mandates differs from other Orange County cities. Being very progressive with available land currently under development, and two major developers active, the master planned community of Irvine has substantial flexibility. They have submitted to the State committing to build 56,000 additional units even though their allocation is approximately 26,000 units, the highest in Orange County. The original vision of Irvine being a residential community with commercial and residential balance runs the risk of being seriously eroded with high density apartments being vigorously constructed. This suggests Irvine might ultimately be more of an urban versus suburban community in the future. Residents are starting to be concerned as to the impact on traffic, parks, and schools. Furthermore, the current City council's recent move to rezone past open space commitments has created voter activism and resistance.

Newport Beach: Newport Beach has faced difficulty implementing the Housing Mandates due the concerns regarding community character, coastal constraints, and local values, contributing to resistance to higher density residential development. While elected officials worked hard at engaging and educating the community on the Housing Mandates, as development projects started to come on-line, major public resistance ensued. A recent ballot initiative was just approved to push back on the City's approved Housing Element.⁷⁴

Mission Viejo: In March 2026, hundreds of Mission Viejo residents rallied in opposition to a proposed expansion of the Vista Del Lago apartment complex off Marguerite Parkway. The developer's plan called for demolishing 68 existing units and replacing them with 418 new units, resulting in a net increase of 350 units, as well as constructing a new parking structure. The expansion would bring the total number of units on the 33-acre property to 958 units, dramatically increasing density in an area surrounded primarily by single-family homes.

After hours of heated public testimony and debate, the City Council voted 3–2 to advance the project. A majority of councilmembers stated they felt they had no choice but to approve the development due to the Housing Mandates, which require cities to zone and plan for significantly higher housing densities regardless of local neighborhood opposition.⁷⁵

⁷³ [Attorney General Bonta Celebrates U.S. Supreme Court's Denial of Huntington Beach's Challenge to State Housing Laws | State of California - Department of Justice - Office of the Attorney General](#)

⁷⁴ [Newport Beach may dump state mandate as residents prep to vote on plan for far fewer housing units | LAist](#)

⁷⁵ [Editorial: Mission Viejo's needless angst over apartments – Orange County Register](#)

San Juan Capistrano: Due to its historical significance and geographic characteristics, the City has been challenged to meet the Housing Mandates. It is a tale of two communities – residents of great wealth and a large lower socioeconomic population requiring the need for more affordable housing. To date, City leadership appear to have built partnerships with low-income developers to build projects that maintain the community's heritage and meet the needs of the City. As high-end development takes place, a "fee in lieu" is assessed that generates funds for affordable housing. Superb planning and design have led to across-the-board community support for well designed, low-income redevelopment projects completed or underway.

Santa Ana: Santa Ana is already considered by HCDs' RHNA process to be a densely populated, lower socioeconomic community, and it has the lowest housing target in Orange County with only 3,137 units. Like Anaheim due to its population size, it has access to more federal and state housing dollars to meet its low-income housing compliance obligations.

The County of Orange: The County also has a RHNA requirement for its unincorporated areas. The County struggled to obtain certification of its Housing Element in 2025; it required multiple revisions due to the nature of small pockets of unincorporated areas it serves. Its largest development area in South Orange County, Rancho Mission Viejo of over 6,000 acres was entitled by the County before the Housing Mandates became law – few were affordable units. In addition, the largest track of undeveloped land is owned by the Federal Government (Cleveland National Forest) and not available for development.

The impacts of the Housing Mandates have disrupted governance and local control. In some communities it has created fierce resistance. The loss of local control impacts the traditions and norms within many Orange County cities. Community heritage, rightly or wrongly, is being seriously eroded.

The one-size-fits-all Housing Mandates has serious repercussions economically and politically only now coming into focus for the voters of Orange County as the implementation goes forward.

Community political activism has increased as housing projects move from approval to construction, but this engagement is often narrowly focused on individual developments rather than broader policy impacts. Cities should take a more proactive role in engaging residents in a comprehensive discussion about how RHNA implementation is affecting neighborhood character, infrastructure, and social cohesion. In addition, local elected officials have a responsibility to clearly communicate how state-directed housing policies, originating in Sacramento, shape local land-use decisions and limit municipal discretion.

7th Cycle (2029-2037) Concerns

The 7th Cycle of the RHNA planning process has already started, addressing the period from 2029-2037. The OCGJ identified significant concerns related to transparency, data integrity, governance, and Orange County's ability to competitively represent itself within the broader SCAG region. These concerns stem from documented issues in the 6th Cycle, particularly the lack of clarity of the allocation methodology, the complexity of the decision-making structure, and inadequate procedural safeguards to ensure that Orange County's unique conditions are fully acknowledged.

The 6th Cycle methodology relied on numerous questionable inputs—including projected population, transit accessibility, job growth, vacancy adjustments, cost burden, and subjective social equity factors—derived from HCD and SCAG's adopted methodology.⁷⁶ These inputs were published but remained difficult for local jurisdictions to interpret due to their subjectivity, complexity and technical nature and the failure of HCD to clearly identify their methodology.⁷⁷

Given these findings, Orange County cities face a recurring risk, because the statewide RHNA determination feeds directly into SCAG allocations, any methodological deficiencies at the state level immediately cascade into subregional planning and ultimately influence the allocations assigned to Orange County jurisdictions.

Experiences from the 6th Cycle highlight several issues that continue to shape Orange County's concerns heading into the 7th Cycle. The previous allocation process was marked by complexity, questionable data, late-stage modifications, and an overall lack of transparency. For example, SCAG's 6th Cycle allocation was adopted in March 2021 and then modified only a few months later⁷⁸, fueling confusion about how final numbers were determined. The process felt unfair to many local jurisdictions because the appeals window was extremely compressed, the methodology was difficult to replicate, and the relationship between data inputs—such as overcrowding, cost burden, or future transit accessibility—and final allocations was not easily understood. The appeals process was also futile and was not open to cities concerns.

Governance also played a role. SCAG and OCCOG rely on a large network of committees, working groups, and advisory bodies, which ensures broad participation but diffuses responsibility. With so many entities involved, accountability for data accuracy, timely inputs, and interpretation of the methodology becomes fragmented, making it difficult for any single entity to ensure the process is both rigorous and transparent.

⁷⁶ [SCAG Final RHNA Methodology, March 5, 2020](#)

⁷⁷ [Best Practices for Allocating & Evaluating RHNA](#)

⁷⁸ [Regional Housing Needs Assessment | Southern California Association of Governments](#)

The upcoming 7th Cycle is expected to be even more data-intensive.⁷⁹ New state guidance calls for clearer and more prescriptive methodology factors, improved appeals procedures, new income categories, and stronger alignment with greenhouse-gas and transportation planning.⁸⁰ Transit definitions are also being standardized statewide, meaning all Orange County Transportation Authority (OCTA) transit routes, frequencies, and hub locations must be fully validated and published early in the process. Without early coordination, the County risks being disadvantaged compared with regions that already have well-organized transit datasets.

Transparency remains a central concern. Orange County jurisdictions need access to all datasets used to calculate their allocations, ranging from growth projections to transit accessibility metrics, and must be able to replicate the calculations that lead to their assigned numbers. The California State Auditor has previously flagged gaps in how HCD documented its factors, reinforcing the need for a system that jurisdictions can audit and verify.

CONCLUSION

“We shape our buildings; thereafter they shape us.” (Winston Churchill)

Housing Mandates and the RHNA allocation process are highly consequential for Orange County jurisdictions, particularly because the construction of low-income housing is rarely feasible without substantial subsidy. Interviewees consistently reported that funding streams to support deed-restricted housing remain limited, leaving cities responsible for planning large numbers of units that may never be financially viable without additional state or federal assistance. This gap between planning obligations and realistic development capacity has heightened local concern about the fairness and practicality of the current RHNA framework not to mention wasted tax dollars.

Against this backdrop, a recurring theme in interviews was the need for stronger regional coordination. Per the Joint Powers Agreement, OCCOG members pay dues to support operations, based on a 2009 adopted formula tied partly to each city’s share of the county population. However, dues have not been adjusted in many years, leading several stakeholders to question whether current funding levels adequately support OCCOG’s ability to coordinate subregional planning, respond to SCAG, and represent Orange County interests on matters as significant as RHNA. SCAG likewise uses population factors in its own dues structure, meaning jurisdictions with growing populations carry greater financial responsibility. Stakeholders noted that the overall

⁷⁹ [California’s Housing Future 2040: The Next Regional Housing Needs Allocation | California Department of Housing and Community Development](#)

⁸⁰ [California’s Housing Future 2040: The Next Regional Housing Needs Allocation | California Department of Housing and Community Development](#)

resource base may still be insufficient for the level of technical engagement required. Many jurisdictions expressed that increased support for OCCOG, both financial and participatory, would improve transparency around RHNA inputs and allow for more robust review of the assumptions that drive housing allocations.

The OCGJ believes that OCCOG is an underutilized regional asset that could play a significantly larger role in promoting equity, transparency, and public understanding of the RHNA process. Interviewees emphasized that consistent, proactive participation by city and county representatives in OCCOG and SCAG meetings is critical, especially early in the methodology-setting phase, when data inputs, assumptions, and distribution formulas are still in development. Without regular engagement, jurisdictions risk losing opportunities to influence decisions that later become binding obligations. Several interviewees suggested that cities consider enhancing their financial contributions so OCCOG can expand its analytical capacity, conduct independent research, and engage more effectively in SCAG's technical and policy committees and at the state level.

As work begins on the 7th Cycle, the need for collaboration is more urgent than ever. Cities cannot afford to be passive observers. Even if cities cannot directly change the final numbers issued by HCD or SCAG, their active involvement is essential to ensuring that Orange County's unique circumstances are understood and represented. Meaningful engagement can also help jurisdictions align their local planning strategies, clarify shared concerns, and coordinate responses to proposed methodological changes before they become final. A more empowered and better-resourced OCCOG would strengthen Orange County's collective voice, improve regional planning outcomes, and ensure local governments are not navigating the California's housing requirements in isolation.

Finally, the OCGJ notes that collaboration must extend beyond government agencies to the residents they serve. As Sacramento lawmakers continue to enact significant housing legislation, much of it with direct consequences for zoning, density, local control and neighborhood character development standards, the public must be informed and involved. Cities, working through OCCOG and SCAG, have an important role in educating residents about new laws, explaining their local impacts, and encouraging constituents to register their views with State Representatives. Improving public awareness not only strengthens transparency and trust but also ensures that community perspectives are included in shaping future housing policy.

By working together, jurisdictions, regional agencies, and the public, Orange County can more effectively navigate the challenges of Housing Mandates and advocate for a clearer, more equitable, and more locally responsive RHNA process.

FINDINGS

In accordance with California Penal Code §933 and §933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency and city affected by the “Findings” presented in this section. Responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation “California Housing Mandates” the 2025-2026 Orange County Grand Jury has arrived at 22 findings as follows:

- F1** In recent years, the California Legislature has enacted an unusually large and burdensome volume of housing-related laws intended to strengthen compliance with State Housing Mandates.
- F2** Housing Mandates are implemented through a RHNA process that often lacks transparency and relies on complex methodologies that are difficult for local officials and the public to understand or meaningfully challenge.
- F3** OCCOG coordinates RHNA regional planning in partnership with the SCAG for Orange County. OCCOG lacks adequate influence with SCAG.
- F4** Meaningful participation by Orange County cities in both OCCOG and SCAG meetings is critical to ensuring that local perspectives are represented during the development and implementation of Housing Mandates policies.
- F5** SCAG’s 6th Cycle RHNA assigned Orange County a questionable total of 183,861 housing units for the 2021–2029 planning period, with higher allocations concentrated in cities with major population and employment centers.
- F6** RHNA allocations are unrealistic and not attainable within the current planning cycle due to limited available land, built-out urban conditions, infrastructure constraints, environmental factors, and public health and safety requirements.
- F7** Residents in Orange County consistently express a desire for local planning decisions to reflect community priorities, including but not limited to neighborhood character, safety considerations, the environment and open-space preservation.
- F8** California’s regulatory construction costs (i.e. permitting fees) present substantial challenges for private housing developers—particularly those delivering affordable units.

- F9** The cost of constructing a single affordable housing unit in California typically ranges from approximately \$500,000 to \$800,000 per unit when fully complying with current state regulations. New low-income housing is generally not financially feasible without public subsidy.
- F10** Prior to their dissolution in 2012, redevelopment agencies served as a primary mechanism for cities and counties to finance affordable housing and related infrastructure. The loss of redevelopment has reduced cities' ability to support construction of affordable units.
- F11** Because public subsidy is limited and highly competitive, cities seeking to produce meaningful quantities of low-income housing must rely in part on private development incentives, often resulting in higher overall development densities and unit counts than the RHNA allocation.
- F12** The 6th Cycle RHNA methodology included numerous technical inputs published by SCAG and HCD; however, these inputs were highly complex and difficult for cities to interpret or independently verify.
- F13** The California State Auditor's 2022 review found significant deficiencies in HCD's regional determination process—including inadequate documentation, data-entry errors, and insufficient justification for key assumptions—raising concerns that similar issues may affect the 7th Cycle process.
- F14** OCCOG's current resources and organizational structure are insufficient to fully advocate for Orange County jurisdictions during RHNA methodology development, especially when compared with larger or more heavily resourced regional councils of governments that also influence SCAG.
- F15** Demands on HCD are anticipated to materially alter methodology for the 7th Cycle, but Orange County jurisdictions have not yet received clear guidance on how these allocations will be translated into SCAG policy or local impacts.
- F16** The reliance on transit accessibility as a major RHNA consideration requires high-quality, early-released datasets from OCTA; however, these datasets are not currently consolidated or formally adopted for use in the 7th Cycle methodology.
- F17** The large number of committees, subcommittees, and advisory groups involved in SCAG and OCCOG's RHNA processes promotes broad participation but diffuses accountability, making it difficult to determine who is responsible for specific analytic inputs or process decisions.

- F18** The City of Huntington Beach has been unsuccessful in its attempts to contest Housing Mandates. To date, Huntington Beach lacks an approved General Plan Housing Element related to RHNA Allocation.
- F19** The City of Irvine has been progressive in submitting a housing plan that calls for twice the number of units mandated (56,000). However, this threatens the historical nature of a master plan community with substantial infrastructure challenges.
- F20** Cities and other stakeholders encounter difficulty explaining RHNA outcomes to elected officials and the public due to a lack of clear, consolidated documentation describing how allocation decisions are derived from the underlying data.
- F21** The absence of a clearly articulated and easily understandable description of the RHNA allocation algorithm contributes to perceptions that discretionary or political considerations may influence outcomes, even when allocations are made in compliance with state housing laws.
- F22** Improved transparency and communication regarding RHNA methodology would enhance public confidence in the process and reduce misunderstandings among member jurisdictions.

RECOMMENDATIONS

In accordance with California Penal Code §933 and §933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency and city affected by the “Recommendations” presented in this section. Responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury makes the following 20 recommendations:

- R1** OCCOG should expand its technical-assistance and training programs, by September 30, 2026, to ensure that all Orange County jurisdictions understand RHNA methodology, statutory obligations, and the implications of noncompliance. (F1, F2, F3, F4)
- R2** OCCOG should coordinate a countywide review of sites identified in local Housing Elements, by December 31, 2026, to evaluate whether each site meets state requirements for realistic capacity and development feasibility, supported by a standardized, version-controlled change log. (F3, F4)

- R3** OCCOG should develop and publish a comprehensive RHNA Inputs Catalog, by April 30, 2027, prior to drafting the 7th Cycle methodology, documenting all datasets used, their sources, methodological assumptions, and a version-controlled record of changes. (F3, F4)
- R4** OCCOG should create a public-facing RHNA Accountability Dashboard, by April 30, 2027, displaying deadlines, responsible agencies, dataset readiness, and upcoming SCAG decision points, to ensure transparency and timely action by jurisdictions. (F16)
- R5** OCCOG should request that SCAG and HCD, by December 31, 2026, provide written guidance explaining how HCD’s recommendations will be applied in shaping the 7th Cycle RHNA methodology so that jurisdictions can prepare proactively. (F16)
- R6** OCCOG should convene a 7th Cycle Technical Working Group, by December 31, 2026, composed of planners, data analysts, and transit experts to pre-evaluate methodology scenarios and deliver unified, countywide recommendations to SCAG. (F3, F6, F15)
- R7** OCCOG, all Orange County cities and the County of Orange should reassess the current dues structure, by September 30, 2026, to ensure that OCCOG has the resources necessary to effectively represent Orange County jurisdictions in SCAG processes, including RHNA methodology development and appeals. (F3, F15)
- R8** By December 31, 2026, the Orange County Board of Supervisors should partner with cities to evaluate countywide infrastructure capacity—including water, wastewater, flood control, transportation, and public-safety systems—and develop a coordinated regional plan capable of supporting the level of housing growth required under state law. (F6)
- R9** By September 30, 2026, the Orange County Board of Supervisors should strengthen its engagement with OCCOG and increase staff support to develop a shared, countywide database of potential housing sites and key development-feasibility factors. (F15)
- R10** By June 30, 2027, the Orange County Board of Supervisors should evaluate whether the County should pursue its own independent Metropolitan Planning Organization (MPO) designation for purposes of regional housing planning. (F5, F6, F7, F15)

- R11** The County of Orange and each city should ensure consistent participation in SCAG and OCCOG committees by September 30, 2026, including the Technical Advisory Committee (TAC), to strengthen regional representation during RHNA-methodology development. (F3, F4, F15)
- R12** The County of Orange and each city should designate a single technical representative, by September 30, 2026, along with an alternate, for all RHNA-related SCAG and OCCOG committees to ensure continuity of participation and eliminate gaps in representation across multiple decision-making bodies. (F4)
- R13** OCTA should provide an official, data-frozen countywide transit dataset (GTFS + GIS), by September 30, 2026, to meet OCCOG’s analytical needs for 7th Cycle RHNA planning. (F17)
- R14** By April 30, 2027, the County of Orange and each city should publish annual monitoring dashboards showing (a) entitlement pipeline conditions, (b) realistic site yield, (c) assembled funding sources for affordable units, and (d) conversion rates from planned capacity to issued permits and completed units, ensuring that County and city-determined capacity assumptions remain aligned with actual production. (F13)
- R15** By September 30, 2026, and ongoing, the County Board of Supervisors and all city councils should make a coordinated and sustained effort to educate their constituents about the RHNA process—its requirements, its impact on local planning and community character, and the role residents can play in shaping outcomes. Public education efforts should also include guidance on how community members can effectively engage with the California Legislature and advocate for more realistic, data-driven housing policies. (F1, F7)
- R16** By December 31, 2026, all cities should look to enhance their relationships with not-for-profit affordable housing developers to increase the opportunity to develop more affordable housing. (F8, F10, F12)
- R17** By September 1, 2026, the City of Huntington Beach should evaluate submitting an appropriate Housing Element to reduce potential exposure to HCD penalties. (F18)
- R18** By September 1, 2026, the City of Irvine should ascertain the level of community support for its housing element submission and its impact on the character of its master plan. (F19)

- R19** By September 1, 2026, SCAG should conduct a formal review of its RHNA allocation methodology and clearly document, in understandable language, the inputs, assumptions, weighting, and decision points used in the allocation algorithm. This documentation should be publicly released and designed to improve transparency, reduce perceptions of political influence, and enhance public understanding of how allocations are determined. (F21)
- R20** By September 1, 2026, SCAG should revise its RHNA appeals process to improve procedural transparency and responsiveness by clearly defining appeal criteria, documenting staff analyses and recommendations, providing written explanations for appeal decisions, and ensuring jurisdictions have meaningful opportunities to present and respond to staff findings. (F22)

RESPONSES CODE

The following excerpts from California Penal Code provide the requirements for public agencies to respond to the Findings and Recommendations of this Grand Jury's report:

Penal Code §933

(c) *No later than 90 days after the grand jury submits a final report on the operations of any public agency subject to its reviewing authority, the governing body of the public agency shall comment to the presiding judge of the superior court on the findings and recommendations pertaining to matters under the control of the governing body, and every elected county officer or agency head for which the grand jury has responsibility pursuant to Section 914.1 shall comment within 60 days to the presiding judge of the superior court, with an information copy sent to the board of supervisors, on the findings and recommendations pertaining to matters under the control of that county officer or agency head and any agency or agencies which that officer or agency head supervises or controls. In any city and county, the mayor shall also comment on the findings and recommendations. All these comments and reports shall forthwith be submitted to the presiding judge of the superior court who impaneled the grand jury. A copy of all responses to grand jury reports shall be placed on file with the clerk of the public agency and the office of the county clerk, or the mayor when applicable, and shall remain on file in those offices. One copy shall be placed on file with the applicable grand jury final report by, and in the control of the currently impaneled grand jury, where it shall be maintained for a minimum of five years.*

Penal Code §933.05.

(a) *For purposes of subdivision (b) of Section 933, as to each grand jury finding, the responding person or entity shall indicate one of the following:*

- (1) *The respondent agrees with the finding.*
- (2) *The respondent disagrees wholly or partially with the finding; in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons therefor.*

(b) *For purposes of subdivision (b) of Section 933, as to each grand jury recommendation, the responding person or entity shall report one of the following actions:*

- (1) *The recommendation has been implemented, with a summary regarding the implemented action.*
- (2) *The recommendation has not yet been implemented, but will be implemented in the future, with a timeframe for implementation.*
- (3) *The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a timeframe for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of*

the public agency when applicable. This timeframe shall not exceed six months from the date of publication of the grand jury report.

(4) The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation therefor.

(c) However, if a finding or recommendation of the grand jury addresses budgetary or personnel matters of a county agency or department headed by an elected officer, both the agency or department head and the board of supervisors shall respond if requested by the grand jury, but the response of the board of supervisors shall address only those budgetary or personnel matters over which it has some decision-making authority. The response of the elected agency or department head shall address all aspects of the findings or recommendations affecting his or her agency or department.

RESPONSES

The Orange County Grand Jury requires (or, as noted, requests) the following responses:

OCCOG Findings Recommendations	90 Day Response Required F3, F4, F5, F12, F13, F14, F15, F17 R1, R2, R3, R4, R5, R6, R7, R9, R11, R13
County of Orange, Board of Supervisors Findings Recommendations	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R10, R11, R12, R14, R15, R16
OCTA Findings Recommendations	90 Day Response Required F16 R13
SCAG Findings Recommendations	90 Day Response Required F3, F4, F5, F12, F13, F14, F15, F17, F20, F21, F22 R5, R11, R19, R20
City of Aliso Viejo Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Anaheim Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Brea	90 Day Response Required

Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Buena Park	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Costa Mesa	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Cypress	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Dana Point	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Fountain Valley	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Fullerton	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Garden Grove	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Huntington Beach	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12, F18
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16, R17
City of Irvine	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12, F19
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16, R18
City of La Habra	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of La Palma	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16

City of Laguna Beach Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Laguna Hills Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Laguna Niguel Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Laguna Woods Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Lake Forest Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Los Alamitos Findings: Recommendations:	90 Day Response Requested F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Mission Viejo Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Newport Beach Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Orange Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Placentia Findings: Recommendations:	90 Day Response Requested F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Rancho Santa Margarita Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16

City of San Clemente	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of San Juan Capistrano	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Santa Ana	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Seal Beach	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Stanton	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Tustin	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Villa Park	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Westminster	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Yorba Linda	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16

GLOSSARY AND ACRONYMS

ADU	Accessory Dwelling Unit (ADU) is a secondary, independent housing unit located on the same lot as a primary residence. ADUs are sometimes called granny flats, in-law units, casitas, or backyard homes.
Builder's Remedy	Builder's Remedy is a provision in California's Housing Accountability Act (HAA) that limits a city or county's ability to deny certain housing projects when the jurisdiction does not have a State-compliant Housing Element.
Charter City	Charter City is a city governed by its own locally adopted charter rather than solely by California general law. Under the California Constitution, charter cities have greater authority over municipal affairs, including land use and zoning. However, this authority may be limited when the State determines that a matter, such as housing, is of statewide concern and subject to state law.
COG	Council of Governments (COG) is a regional planning body made up of elected officials from cities and counties within a defined geographic area.
Deed-Restricted	Deed-Restricted refers to a property that is subject to legally recorded limitations or conditions placed on its use, occupancy, or resale. In the housing context, deed restrictions are commonly used to ensure long-term affordability by limiting resale prices, rental rates, or eligible occupants based on income thresholds for a specified period, often several decades or longer.
Deed-in-Lieu	Deed-in-Lieu (of foreclosure) is a voluntary transaction in which a property owner transfers ownership of a property to a lender to satisfy a mortgage debt and avoid foreclosure. While commonly used in the private lending context, the term may appear in discussions of property disposition, distressed assets, or redevelopment-related transactions.
Density Bonus Incentives	Density Bonus Incentives are benefitting that California law (primarily Government Code § 65915) provides to housing developers in exchange for including affordable housing units within a residential or mixed-use project. These incentives make it easier and financially feasible to build affordable housing by allowing developers flexibility beyond local zoning limits.
Equity Component	Equity Component is the requirement that housing need to be allocated in a way that promotes socioeconomic equity, reduces

segregation, and balances disproportionate household income distributions across jurisdictions.

Fee-in-Lieu

Fee-in-Lieu refers to a payment made as an alternative to fulfilling a low income housing requirements.

Federal Clean Air Act

Federal Clean Air Act (CAA) is the primary U.S. federal law that regulates air pollution to protect public health and the environment. It authorizes the federal government, principally the U.S. Environmental Protection Agency (EPA), to set and enforce standards that limit harmful air pollutants from industrial facilities, power plants, and motor vehicles.

GIS

Geographic Information System (GIS) is a type of software and data system used to map, analyze, and visualize geographic information. Examples: ArcGIS, QGIS which integrates layers of spatial information such as: Parcels, Zoning maps, Transit lines (often imported from GTFS), Flood zones, Environmental constraints, Income and demographic data, RHNA site inventories.

Grand Jury

Grand Jury (GJ) is a legal body empowered to conduct official proceedings to investigate potential criminal conduct and determine whether criminal charges should be brought.

Green State

Green State generally refers to a government or jurisdiction, often a U.S. state, that prioritizes environmental protection, sustainability policies, and climate-focused governance. The term is descriptive, not legal.

GTFS

General Transit Feed Specification (GTFS) is a standardized, machine-readable data format used to describe public transit systems, including Bus routes, Rail lines, Station and stop locations, Service schedules.

General Plan

In California, a city General Plan is a comprehensive, long-term policy document that serves as the legal and policy foundation for all local land-use and development decisions within a city. Adopted by the city council pursuant to California Government Code § 65300 et seq., the General Plan expresses the community's vision for physical development and conservation over time and guides zoning, public investment, and regulatory actions.

HAU

Housing Accountability Unit (HAU) is a specialized enforcement and oversight unit within the California Department of Housing and Community Development created to ensure local governments comply with state housing and homelessness laws and to hold

	jurisdictions accountable for meeting their Housing Element commitments.
HCD	Housing and Community Development (HCD) is California state agency responsible for housing policy, building standards, and the administration of affordable housing and community development programs. It operates under the California Business, Consumer Services and Housing Agency (BCSH).
Housing Element Law (65580-65589.11)	Housing Element Law is California's foundational land-use law requiring every city and county to plan for the housing needs of all economic segments of the community. It is part of each jurisdiction's General Plan and must be regularly updated on a state-mandated cycle.
Joint Powers Authority	A Joint Powers Authority (JPA) is a legal structure used in California (and some other states) that allows two or more public agencies to jointly exercise their powers through a separate, shared entity.
Layered Financing	Layered Financing (sometimes called capital stacking) is a funding approach in which a project—most commonly a real estate or affordable housing development—is financed through multiple sources of capital, each with different requirements, risk levels, repayment terms, and priorities.
Ministerial approval	Ministerial approvals are a type of land-use or development approval in which a government agency must issue the permit automatically once an application meets all the objective, pre-established standards. Because the approval is non-discretionary, officials do not exercise judgment or interpretation, hold public hearings, or evaluate subjective criteria such as neighborhood character or compatibility.
MPO	Metropolitan Planning Organization (MPO) is a regional transportation-planning agency required by federal law in every urbanized area with 50,000 or more people.
OCGJ	Orange County Grand Jury (OCGJ) refers 2025-2026 Orange County Grand Jury.
OCTA	Orange County Transportation Authority (OCTA) is the county transportation planning commission, responsible for funding and implementing transit and capital projects for a balanced and sustainable transportation system.
RHNA	Regional Housing Needs Allocations (RHNA) works with the California Department of Housing & Community Development (HCD) to allocate each jurisdiction's share of required housing across income levels.

RTP

Regional Transportation Plans (RTP) are utilized to coordinate regional transportation, land-use planning, and climate-related planning (e.g., reducing vehicle miles traveled). Data, forecasts, and long-range planning. They provide demographic forecasts, economic analyses, and collaborative regional policies.

State Housing Mandates

State Housing Mandates (Housing Mandates) are legal requirements specifically the Housing Element Law in California, obligating local governments (cities/counties) to adopt plans facilitating the construction of housing across all income levels. These mandates require compliance with Regional Housing Needs Allocation (RHNA) targets forcing localities to zone for rather than necessarily build.

SCS

In California, a Sustainable Communities Strategy (SCS) is a regional land-use, housing, and transportation planning framework prepared by a Metropolitan Planning Organization as part of its Regional Transportation Plan. Required by Senate Bill 375 (2008), the SCS is designed to integrate transportation investments, housing patterns, and land-use policies in a way that reduces greenhouse gas emissions from passenger vehicles while supporting economic development and public health.

Vacancy Factor Rates

Vacancy Factor Rates refer to the percentage of housing units within a defined geographic area that are assumed to be vacant at any given time. In state housing planning, vacancy rates are used as an analytical adjustment to account for normal turnover in the housing market and to ensure availability for new households. Assumed vacancy rates directly affect housing need calculations and can influence required housing production targets.

**5th Cycle,
6th Cycle,
7th Cycle**

The 5th, 6th, and 7th Cycles refer to sequential eight-year planning periods of the Regional Housing Needs Allocation (RHNA) process mandated by California housing law.

- The 5th Cycle generally covered the period from 2013 to 2021 (with timing varying by region).
- The 6th Cycle generally covers the period from 2021 to 2029 and includes significantly higher housing allocations statewide.
- The 7th Cycle will be the next allocation period following the 6th Cycle and is expected to further shape long-term housing planning requirements for cities and counties.

Each cycle establishes projected housing needs that jurisdictions must plan for through their Housing Elements.

BIBLIOGRAPHY

ABAG. “The “Builder’s Remedy” and Housing Elements”. *Association of Bay Area Governments – Technical Assistance for Local Planning Housing*, accessed on May 14, 2026. [The Builder’s Remedy and Housing Elements](#)

Alameldin, Muhammad. “California Housing Laws That Go into Effect in 2025”. *Turner Center for Housing Innovation – UC Berkeley*, October 29, 2024. [California Housing Laws That Go into Effect in 2025 - Turner Center](#)

Biesiada, Noah. “CA Auditor Bashes State’s Mandated Housing Numbers, Says Process Is Flawed, Lacks Oversight”. *Voice of OC*, April 25, 2022. [CA Auditor Bashes State’s Mandated Housing Numbers, Says Process Is Flawed, Lacks Oversight](#)

Biesiada, Noah. “Huntington Beach Reignites Fight Against State Housing Law”. *Voice of OC*, January 11, 2024. [Huntington Beach Reignites Fight Against State Housing Law](#)

Biesiada, Noah. “How Are Orange County’s Cities Doing At Building Affordable Housing?”. *Voice of OC*, April 2, 2024. [How Are Orange County’s Cities Doing At Building Affordable Housing?](#)

Biesiada, Noah. “Irvine Grapples With Nearly 60,000 New Housing Unites in General Plan Proposal”. *Voice of OC*, May 21, 2024. [Irvine Grapples With Nearly 60,000 New Housing Units in General Plan Proposal](#)

Biesiada, Noah. “Federal Appeals Court Slaps Down Huntington Beach’s Anti Housing Lawsuit”. *Voice of OC*, October 30, 2024. [Federal Appeals Court Slaps Down Huntington Beach’s Anti Housing Lawsuit](#)

Bonta, Rob. “Attorney General Bonta Celebrates U.S. Supreme Court’s Denial of Huntington Beach’s Challenge to State Housing Laws”. *State of California – Department of Justice*, February 23, 2026. [Attorney General Bonta Celebrates U.S. Supreme Court’s Denial of Huntington Beach’s Challenge to State Housing Laws | State of California - Department of Justice - Office of the Attorney General](#)

Business issues and Legislative Guide. “Leading the Way to a More Prosperous California”. *Advocacy*, accessed on May 14, 2026. [California Housing in 2025 - Advocacy - California Chamber of Commerce](#)

CA DOF. “Population Projections (Baseline 2024)”. *State of California Department of Finance*, accessed on May 14, 2026. [Projections | California Department of Finance](#)

CALCOG. “What Regions Do”. *California Association of Councils of Governments*, 2026. [Home - California Association of Councils of Governments](#)

CALCOG. “Housing Implementation Programs Exchange”. *California Association of Councils of Governments*, accessed in January 2026. [Housing Exchange - California Association of Councils of Governments](#)

California Department of Housing and Community Development. “Home Page”. *California HCD*, 2026. [California Department of Housing and Community Development | California Department of Housing and Community Development](#)

California Department of Housing and Community Development. “State Housing Law Program”. *California HCD*, 2026. [State Housing Law Program | California Department of Housing and Community Development](#)

California Department of Housing and Community Development. “California Reaches Settlement with City of Fullerton over Violations of Housing Element Law”. *California HCD*, January 18, 2024. [California Reaches Settlement with City of Fullerton over Violations of Housing Element Law | California Department of Housing and Community Development](#)

California Government Code §65584.01(b). [California Government Code section 65584.01 \(2025\)](#)

California State Senate. “Recent Legislative Actions to Increase Housing production in California”. *Shou Senate California Government*, February 2025. [California State Senate Recent Legislative Actions](#)

Case-Law. “Orange Cnty. Council of Gov’ts. v. Velasquez”. *vlex*, accessed on May 14, 2026. [Orange Cnty. Council of Gov'ts. v. Velasquez - vLex United States](#)

CDHC. “A Home for Every Californian”, *Statewide Housing Plan*, accessed on May 14, 2026. [Statewide Housing Plan](#)

CDHCD. “California’s Housing Future 2040: The Next Regional Housing Needs Allocation”. *California Department of Housing and Community Development*, accessed on May 14, 2026. [California’s Housing Future 2040: The Next Regional Housing Needs Allocation | California Department of Housing and Community Development](#)

CDHCD. “Enforcement Authority”. *California Department of Housing and Community Development*, accessed on May 14, 2026. [Enforcement Authority | California Department of Housing and Community Development](#)

CDHCD. “Housing Open Data Tools”. *California Department of Housing and Community Development*, accessed on May 14, 2026. [Housing Open Data Tools | California Department of Housing and Community Development](#)

Center for Demographic Research. “Orange County Progress Report”. *Cal State Fullerton*, April 9, 2026. [products | CSUF - Center for Demographic Research](#)

Chase, Caroline Guibert. ““Builder’s Remedy” Reform Bill Approved by Governor Newsom”. *Allen Matkins*, September 19, 2024. [“Builder’s Remedy” Reform Bill Approved by Governor Newsom | Allen Matkins](#)

Chief Financial Officer. “FY 2024-2025 Adopted Budget with NCC Summary”. *County of Orange*, 2024-2025. [FY 2024-25 Final Budget Summary](#)

Christopher, Ben. “Gavin Newsom signs law overhauling local zoning to build more housing”. *Cal Matters*, October 10, 2025. [New California law overrules local zoning to boost housing - CalMatters](#)

Christopher, Ben. (2025, September 28). Why the housing shortage is so hard to quantify. *Los Angeles Times (Sunday)*. [PressReader.com | Why the housing shortage is so hard to quantify](#)

Conte, Allaire. “California Added More Homes Than People – but Buyers and Renters Still Aren’t Getting Relief”. *realtor.com*, April 17, 2026. [More Homes, Hardly Any Population Growth—So Why Is California Still So Expensive?](#)

Elmendorf, Christopher S. “A Primer on California’s “Builder Remedy” for Housing-Element Noncompliance”. *UCDavid School of Law*, March 29, 2022. [Builder’s Remedy Primer](#)

Espinoza, Pablo “Court Agrees Anaheim Violated State Law. Decision is a Big Win for Fair Housing in California”. *California Department of Housing and Community Development*, February 2, 2024. [Court Agrees Anaheim Violated State Law. Decision is a Big Win for Fair Housing in California | California Department of Housing and Community Development](#)

Farzan, Yusra. “Irvine considers waiving affordable housing requirements for developer in land swap deal”. *LAist*, December 8, 2025. [Irvine considers waiving affordable housing requirements for developer in land swap deal | LAist](#)

Farzan, Yusra. “Major OC developer can skip affordable housing requirements after Irvine land swap approval”. *LAist*, December 11, 2025. [Major OC developer can skip affordable housing requirements after Irvine land swap approval | LAist](#)

FRBSF, “California Post-RDA Affordable Housing Developer Survey: Analysis of Results”. *Federal Reserve Bank of San Francisco*, accessed on May 14, 2026. [California Post-RDA Affordable Housing Developer Survey: Analysis of Results - San Francisco Fed](#)

Fulton, Bill. “New Pathways to Encourage Housing Production: A Review of California’s Recent Housing Legislation”. *Terner Center for Housing Innovation – UC Berkeley*, April

2023. [New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf](#)

Fulton, William. “Steps Local Governments Can Take to Unlock More Housing: Lessons from San Diego”. *Turner Center for Housing Innovation – UC Berkeley*, October 8, 2025. [Steps Local Governments Can Take to Unlock More Housing: Lessons from San Diego - Turner Center](#)

Garcia, David. “Making It Pencil: The Math Behind Housing Development (2023 Update)”. *Turner Center for Housing Innovation – UC Berkeley*, December 2023. [Turner Center UC Berkeley Development Math](#)

Goertzen, Jeff and Lansner, Jonathan. (2026, April 4) Infographic: Are people leaving California? Here’s what the numbers show us. *The Orange County Register*, online. [Infographic: Are people leaving California? Here’s what the numbers show us – Orange County Register](#)

Greenwald, David. “Court: ‘Regional Housing Need’ Determinations Aren’t Judicially Reviewable”. *Vanguard News Group*, July 28, 2023. [Court: ‘Regional Housing Need’ Determinations Aren’t Judicially Reviewable - Davis Vanguard](#)

Hale, Danielle and others. “The California State of Real State”. *realtor.com*, January 29, 2026. [The California State of Real Estate - Realtor.com Economic Research](#)

Hicks, Angelina. “San Juan Capistrano With Mandated Housing Numbers”. *Voice of OC*, August 26, 2025. [San Juan Capistrano Grapples With Mandated Housing Numbers](#)

Johnson, Hans and Mejia, Marisol Cuellar and McGhee, Eric. “California’s Population”. *PPIC*, January 2026. [California's Population - Public Policy Institute of California](#)

Johnson, Nikie and Collins, Jeff. (2021, January 31). Report Card: California cities, counties failing again on affordable housing goals. *The Orange County Register*, online. [Report card: California cities, counties failing again on affordable housing goals – Orange County Register](#)

Julia Gill and Schuetz, Jenny. “In California, statewide housing reforms brush against local resistance”. *Brookings*, June 28, 2023. [In California, statewide housing reforms brush against local resistance | Brookings](#)

LegalClarity California. “California Housing Element Law Explained”. *Search LegalClarity*, December 14, 2025. [California Housing Element Law Explained – Legal Clarity](#)

LigiScan LLC. “California Legislature | 2025-2026 | Regular Session”. *LigiScan – Bringing People to the Process*, 2025-2026. [California Legislature | 2025-2026 | Regular Session | LigiScan](#)

Mazzella, Danielle M. “California Affordable Housing Needs Report 2025”. *California Housing Partnership*, 2025. [CHP State Housing Needs Report](#)

McDonald, Cynthia. “Planning Commission Meeting Bombshell!”. *Costa Mesa First*, February 13. [Planning Commission Bombshell: Housing Element Update Crisis in Costa Mesa](#)

Metcalf, Ben. “Testimony to the Select Committee on Housing Construction Innovation”. *Terner Center for Housing Innovation – UC Berkeley*, January 6, 2026. [Testimony to the Select Committee on Housing Construction Innovation - Terner Center](#)

Newsom, Garvin. “Final Regional Housing Need Assessment”. *State of California – Department of Housing and Community Development*, October 15, 2019. [Southern California COG Regional Housing Need Determination](#)

OCCOC. “Press Release June 1, 2021”. *Orange County Council of Governments*, June 1, 2021. [OCCOG Press Release HCD](#)

OCCOG. “We lead Orange County’s subregional planning”. *Orange County Council of Governments*, accessed in January 2026. [Orange County Council of Governments](#)

Orange County Community. “Orange County Community Indicators - 25th Anniversary Report”. *Orange County Business Council*, 2024-2025. 1-150. [CommunityIndicators24_digital.pdf](#)

Osterberg, Annelise. “Best Practices for Allocating and Evaluating RHNA”. *Goldman School of UC*, Spring 2020. [Best Practices for Allocating & Evaluating RHNA](#)

Press Release. “California State Auditor Releases Scathing Report on RNA Process, Report Finds Housing Goals are Not Supported by Evidence”. *Voice of OC*, April 8, 2022. [California State Auditor Releases Scathing Report on RHNA Process, Report Finds Housing Goals are Not Supported by Evidence](#)

SCAG. “About Us”. *Southern California Association of Governments*, accessed on January 14, 2026. [About us | Southern California Association of Governments](#)

SCAG. “Regional Housing Needs Assessment”. *Southern California Association of Governments*, accessed in January 2026. [Regional Housing Needs Assessment | Southern California Association of Governments](#)

South Coast AQMD. “Frequently Asked CEQA Questions”. *South Coast Air Quality Management District*, accessed on May 14, 2026. [South Coast Air Quality Management District - CEQA](#)

Tilden, Michael S. “Regional Housing Needs Assessments”. *Auditor of the State of California*, March 17, 2022. [Report 2021-125](#)

The Editorial Board (2026, March 11). Editorial: Mission Viejo's needless angst over apartments. *The Orange County Register*, online. [Editorial: Mission Viejo's needless angst over apartments – Orange County Register](#)

Trachtman, Samuel. "Fixing California's housing shortage requires new policy and new politics". *BESI – Berkeley Economy & Society Initiative*, April 22, 2025. [Fixing California's housing shortage requires new policy and new politics - Berkeley Economy & Society Initiative](#)

Uhler, Brian. "LAO Housing Publications". *Legislative Analyst's Office – The California Legislature's Nonpartisan Fiscal and Policy Advisor*, accessed on May 14, 2026. [California Legislative Analyst's Office - California Housing](#)

United States Census Bureau. "Parent Directory". *United States Government*, accessed in April 2026. [Index of /programs-surveys/popest/tables](#)

Varian, Ethan. (2023, June 25). Nuclear option? Supersized housing projects are planned for Bay Area's wealthiest cities. Is one coming to your neighborhood? *The Mercury News*, online. [Is a supersized housing project coming to your Bay Area neighborhood?](#)

Ward, Jason M. and Schlake, Luke. "The High Cost of Producing Multifamily Housing in California". *Rand*, April 2, 2025. [The High Cost of Producing Multifamily Housing in California: Evidence and Policy Recommendations | RAND](#)

2024 Advocates Guide. "Land Use Restrictions and Affordable Housing". *National Low Income Housing Coalition*, accessed on May 14, 2026. [National Low Income Housing Coalition - Land Use Restrictions and Affordable Housing](#)

APPENDIX

APPENDIX A: Major Housing Laws & What They Tried to Do⁸¹

Surplus Land Act (1968; strengthened by AB 1486 in 2019)

Problem addressed: Local agencies often disposed of valuable public land without prioritizing affordable housing.

Solution: The Surplus Land Act requires local agencies to offer surplus sites to affordable housing developers first; AB 1486 (2019) expanded who must comply, added reporting, and created enforceable penalties. HCD now issues binding guidelines and may impose fines.

Role: A siting tool that converts public land near jobs/transit into affordable housing at scale (HCD reports thousands of units proposed/approved under SLA).

Housing Element Law & RHNA (1969; RHNA made mandatory by 1980 AB 2853; repeatedly strengthened)

Problem addressed: Cities historically under-planned for growth or zoned exclusionary, constraining supply across income levels.

Solution: Every city/county must adopt an 8-year Housing Element showing adequate, zoned sites to meet its RHNA allocation by income tier; HCD issues regional need determinations and certifies elements. Enforcement has tightened (HCD's Housing Accountability Unit; fines; referrals to the AG).

Role: The spine of California housing policy—other laws (HAA, SB 35, SB 330, AFFH) enforce or operationalize these plans.

Density Bonus Law (1979; expanded often, incl. AB 1287 in 2023)

Problem addressed: Mixed-income projects often do not pencil without zoning flexibility.

Solution: Grants extra units, incentives/waivers, and reduced parking in exchange for deed-restricted affordable homes; AB 1287 (2023) added a “stackable” bonus on top of the 50% base, enabling up to ~100% bonus with additional very-low/moderate units.

Role: A ubiquitous feasibility lever to deliver affordability in market-rate projects.

Housing Accountability Act (HAA) (1982; strengthened 2017–2019)

Problem addressed: Cities used subjective discretion (e.g., “neighborhood character”) to deny otherwise compliant housing.

Solution: Limits denial, density reduction, or infeasible conditions for projects meeting objective standards, unless the city makes specific, evidence-based health/safety findings. 2017–2019 updates raised the burden of proof, added fees/attorney's fees, and clarified “objective standards.”

Role: A litigation-backed guardrail ensuring code-compliant housing moves forward—the State's classic “anti-NIMBY” tool.

Redevelopment Agencies (RDAs): Termination and Loss of Local Affordable Housing Funds (2011–2012)

Problem addressed (pre-2012): RDAs used tax-increment financing with a 20% housing set-aside to fund affordable housing; the State later sought budget relief.

Solution: The Legislature passed ABx1 26 (2011); the California Supreme Court affirmed dissolution

⁸¹ Housing Statutes were summarized Microsoft Co-Pilot May 2025 version

effective Feb 1, 2012, shifting property-tax increment, and creating successor agencies to wind down obligations.

Role: Ended a major local funding stream, increasing reliance on density bonus, public land, tax credits, and state programs.

SB 375 (2008) & SB 743 (2013; statewide VMT implementation 2020)

Problem addressed: Sprawl drove VMT and GHGs; CEQA's **Level of Service (LOS)** metric discouraged infill.

Solution: **SB 375** requires Sustainable Communities Strategies (SCS) aligning land use and transportation to cut GHGs; **SB 743** replaced LOS with VMT in CEQA, favoring infill and multimodal access, with statewide implementation by 2020.

Role: Climate + housing siting framework; housing near jobs/transit faces fewer CEQA hurdles than sprawl.

ADUs (2016–2025 waves): Legalizing “Gentle Density”

Problem addressed: Single-family-only rules and local barriers (parking, minimums) impeded backyard cottages/garage conversions near jobs.

Solution: Successive bills created 60-day ministerial approval, broad parking relief, and standardized rules; HCD's 2025 ADU Handbook consolidates guidance and updates.

Role: A distributed, lower-cost production engine—large, scalable homeowner-led supply statewide.

HCD Law §16884.01 (2017): Establishes Housing Element Compliance Consequences and State Enforcement Authority

Problem addressed: For decades, many cities and counties failed to adopt or maintain HCD-compliant Housing Elements, resulting in chronic under-production of housing, exclusionary zoning practices, and resistance to RHNA obligations. Prior housing law lacked clear, enforceable consequences for noncompliance, allowing jurisdictions to delay, obstruct, or ignore housing planning requirements with minimal risk. This undermined statewide housing policy, fair housing objectives, and public accountability.

Solution: HCD Law §16884.01 clarifies and operationalizes the legal consequences of Housing Element non-compliance, explicitly linking failure to adopt or implement a compliant Housing Element to loss of local land-use discretion and enhanced state oversight. The law affirms HCD's authority to make formal findings of noncompliance and triggers statutory remedies under related housing laws, including limits on down-zoning, exposure to the Housing Accountability Act, and eligibility for “builder's remedy” projects when required conditions are met. It strengthens the enforceability of Housing Element Law by making compliance legally consequential rather than aspirational.

Role: A state enforcement backbone for California's housing planning system, §16884.01 functions as a compliance-triggering provision that gives real effect to RHNA and Housing Element Law. It shifts housing policy from a negotiation-based model to a rule-of-law framework, ensuring that local governments that refuse to plan for housing face predictable, uniform consequences while compliant jurisdictions retain local control. The statute is central to California's modern “Yes In My Backyard” enforcement regime.

SB 35 (2017): Streamlined Ministerial Approval

Problem addressed: Lengthy discretionary review and CEQA litigation stalled production, especially where jurisdictions lagged RHNA.

Solution: Creates a ministerial (CEQA-exempt) pathway in cities not meeting RHNA progress for qualifying infill projects that meet objective standards, affordability, and labor provisions; HCD issued binding guidelines.

Role: A fast lane that translates zoning into approvals within 90–180 days; HCD publishes which jurisdictions are subject.

AB 686 (2018): Affirmatively Furthering Fair Housing (AFFH)

Problem addressed: Persistent segregation and unequal access to opportunity despite fair-housing statutes.

Solution: Requires all public agencies to affirmatively further fair housing and adds new Housing Element duties (analysis of segregation, access to opportunity, displacement risk, equitable siting).

Role: Embeds civil-rights obligations into RHNA/Housing Elements, pushing lower-income housing into high-opportunity areas.

SB 330 (2019; extended by SB 8 to 2030): Housing Crisis Act

Problem addressed: Moving goalposts (new subjective standards), downzoning, unlimited hearings, and loss of protected units increased entitlement risk.

Solution: Freezes new subjective design rules, caps hearings, creates preliminary application vesting, and requires replacement/relocation when protected units are impacted.

Role: Stabilizes entitlements, preserves capacity, and protects renters.

SB 9 (2021): Duplexes & Urban Lot Splits

Problem addressed: Large single-family parcels constrained capacity; owners lacked simple legal paths to add units.

Solution: Requires ministerial approval of up to two units on most single-family lots and allows urban lot splits (with guardrails). Implementation and litigation have been mixed, but SB 9 continues to operate statewide.

Role: Incremental densification in high-opportunity areas (uptake has been modest vs. ADUs).

SB 10 (2021): Local Rezoning for “Missing Middle” Housing

Problem addressed: CEQA-exposed rezonings and voter-approved limits made modest upzoning slow and risky.

Solution: Voluntary tool letting cities zone up to 10 units/parcel on transit-rich or urban infill sites with the rezoning action itself exempt from CEQA; may override local initiative restrictions with a 2/3 council vote.

Role: A local-option upzoning mechanism; note it does not streamline the project approvals that follow.

AB 2011 (2022): Affordable Housing and High Road Jobs Act

Problem addressed: Vast commercially-zoned land sat underused while housing faced discretionary review and CEQA.

Solution: Creates ministerial, CEQA-exempt approvals for qualifying multifamily on commercial corridors via two paths: 100% affordable or mixed-income meeting corridor, site, and labor standards. Effective July 1, 2023.

Role: A production-focused pathway converting retail/office/parking sites into housing statewide.

SB 6 (2022): Middle Class Housing Act (Companion to AB 2011)

Problem addressed: Housing often not allowed on commercial parcels absent a rezoning.

Solution: Allows residential use in many commercial zones (by right as a permitted use) with labor standards; not ministerial/CEQA-exempt on its own (but can combine with other tools). Effective July 1, 2023.

Role: Opens more sites to housing when AB 2011 is not available.

AB 2097 (2022): Eliminating Parking Minimums Near Transit

Problem addressed: Mandatory parking minimums near transit raised costs and reduced housing feasibility.

Solution: Prohibits minimum parking requirements for most projects within ½ mile of a major transit stop (with narrow exceptions); HCD issued a 2025 Technical Advisory for implementation.

Role: Lowers costs and removes a common barrier to infill housing.

SB 423 (2023): Extends & Expands SB 35 Through 2036

Problem addressed: SB 35's 2026 sunset and exclusions (e.g., much of the Coastal Zone) limited reach; many cities still failed RHNA or lacked certified elements.

Solution: Extends SB 35 to 2036, applies streamlining to more jurisdictions and sites (incl. parts of the Coastal Zone), ties eligibility to Housing-Element compliance, and updates affordability/labor standards; allows DGS to administer on State-owned land.

Role: A statewide production accelerator, making the SB 35 fast lane broader and longer-lived.

SB 131 + AB 130 (2025): CEQA & Housing Streamlining (Budget Trailer Bills)

Problem addressed: Infill housing still faced CEQA delays, litigation risk, and inconsistent timelines.

Solution: Establishes new CEQA exemptions for qualifying infill housing (e.g., up to 20 acres, or 5 acres for builder's-remedy sites), streamlined review, and—via the broader package—a temporary freeze on code updates to improve predictability. Effective June 30, 2025.

Role: A modernized CEQA framework that complements HAA/SB 330/SB 35 to speed compliant housing.

Builder's Remedy under HAA (codified/updated 2024–2025)

Problem addressed: Some cities delayed or adopted **non-compliant Housing Elements** to preserve restrictive zoning.

Solution: AB 1893 (2024) and AB 1886 (2024) formalize and clarify the Builder's Remedy: where a jurisdiction lacks a certified element, qualifying projects with required affordability may proceed (with new standards and protections effective Jan 1, 2025).

Role: A blunt enforcement backstop—if a city does not plan properly, it loses discretion to reject compliant affordable projects.

SB 79 (2025): Overrides Local Zoning to Enable Higher-Density Housing Near Transit

Problem addressed: Local zoning caps on height and density near transit stops prevented production of transit-oriented housing even in regions with extensive rail and bus networks.

Solution: Preempts local zoning within ½ mile of qualifying transit stops to legalize multi-story multifamily housing, allowing substantially greater height and density. Creates a statewide TOD framework that can be combined with SB 35, SB 330, the Housing Accountability Act, and the State Density Bonus Law to streamline approvals at lower affordability thresholds.

Role: A land-use preemption tool establishing “as-of-right” higher density near transit so state streamlining laws (e.g., SB 35) can actually deliver buildable transit-oriented projects. It operationalizes California's TOD objectives and supports pro-housing production goals.

AB 507 (2025): Establishes Adaptive Reuse as Use-by-Right With Streamlined Approval

Problem addressed: High commercial vacancy rates and slow, discretionary local approval processes made it difficult to convert underutilized office/retail buildings into housing—despite acute statewide housing shortages.

Solution: Declares adaptive reuse a use-by-right in all zones except non-residential industrial areas and provides ministerial, streamlined approval for eligible projects in existing buildings (generally <50 years old or meeting historic-preservation requirements). Requires income-restricted units (e.g., 8% very low + 5% extremely low, or 15% lower-income for rentals) and allows mixed-use conversions if ≥50% of floor area is residential. Waives parking for portions of buildings without existing on-site parking.

Role: A conversion-focused production tool enabling rapid, CEQA-bypassed adaptive reuse of commercial buildings into housing. Pairs with local incentive programs (e.g., tax-increment-funded Adaptive Reuse Investment Funds starting FY 26-27) to subsidize affordability and unlock large-scale urban reuse.

AB 648 (2025): Exempts Community College Housing from Local Zoning

Problem addressed: Community college districts (CCDs) face severe barriers building student, faculty, and staff housing because local zoning ordinances—unlike UC/CSU—block or delay projects, worsening housing insecurity for the 2M+ community college students, over half of whom experience housing instability.

Solution: Exempts CCD-built student, faculty/staff, and university housing projects on CCD-owned or leased property from local city/county zoning regulations. Requires certain projects with faculty/staff units to include extremely low- and lower-income affordable units. Declares the exemption a matter of statewide concern applying to all cities, including charter cities.

Role: A state-level preemption tool enabling rapid production of student and workforce housing on community college land, eliminating local zoning barriers and aligning CCD authority with UC/CSU to address student homelessness and workforce affordability.

AB 1021 (2025): Expands and Streamlines Workforce Housing on School District Property

Problem addressed: High housing costs prevent school districts from recruiting and retaining teachers and staff; thousands of acres of school-owned land remain underutilized due to zoning barriers, procedural hurdles, and limits on allowable uses.

Solution: Revises and expands the law deeming workforce housing an allowable use on any property owned by a local educational agency (LEA). Requires qualifying projects (≥10 units) to prioritize renting to school employees and the public under a set hierarchy, with a majority of units deed-restricted for lower- or moderate-income households. Applies Housing Accountability Act protections, enables density bonuses, and extends the program to 2036.

Role: A major workforce-housing production tool that cuts red tape, activates school district land for affordable educator housing, and strengthens school staffing stability—particularly in high-need communities where housing costs drive turnover.

AB 253 (2025): Creates a Private Pathway to Speed Up Residential Permit Plan-Checking

Problem addressed: Local building departments often take more than 30 days to complete residential plan checks, creating permitting backlogs that slow housing production, increase project costs, and leave small-scale infill projects stalled.

Solution: Establishes the *California Residential Private Permitting Review Act*, requiring cities/counties to publish residential permit fee schedules and provide applicants with estimated plan-check timelines. If the estimated timeframe exceeds 30 business days (or if no determination is provided within 30 days), applicants may hire a licensed private professional (“private professional provider”) to perform the plan check. Applies to 1–10 unit projects ≤40 ft tall and allows private reviewers to certify compliance via affidavit.

Role: A post-entitlement acceleration tool that cuts through municipal bottlenecks by letting homeowners and builders use certified private reviewers, moving small-scale housing through permitting faster while maintaining local agency oversight.

AB 1308 (2025): Imposes an Inspection “Shot Clock” and Allows Private Inspectors

Problem addressed: Unpredictable and months-long delays in final inspections—framing, electrical, plumbing, final occupancy sign-off—prevent newly built or renovated homes from being occupied, increasing holding costs and slowing the delivery of small-scale housing.

Solution: Requires local building departments to conduct inspections for 1–10-unit projects (≤40 ft) within 10 business days after receiving notice of completion. If the estimated inspection window exceeds 30 days—or no inspection occurs within 30 days—applicants may hire a licensed private professional inspector to complete the inspection and submit an affidavit attesting to code compliance. Also requires cities/counties to post residential permit fee schedules.

Role: A post-entitlement enforcement and delivery tool that ensures housing is not delayed at the final inspection stage. Speeds up occupancy, adds accountability to local inspection offices, and allows builders to default to vetted third-party inspectors when jurisdictions are too slow.

AB 712 (2025): Strengthens Enforcement of State Housing Laws Against Noncompliant Cities

Problem addressed: Local agencies routinely delay, obstruct, or illegally deny housing projects despite state housing reform laws; enforcement is weak, costly for applicants, and slow, enabling jurisdictions to continue violating State Mandates without consequence.

Solution: Creates a robust enforcement framework requiring courts to award attorney’s fees and costs to prevailing housing applicants and to impose mandatory fines on violating local agencies. Extends statutes of limitation by 60 days when applicants issue a notice of intent to sue, and bars agencies from requiring applicants to indemnify them for litigation arising from the agency’s own violations. Defines “housing reform law” broadly to cover laws protecting housing applicants or limiting local discretion.

Role: A statewide compliance tool that finally gives housing applicants meaningful remedies—and gives local governments financial and legal consequences for ignoring state housing law, thereby enabling real enforcement of the State’s pro-housing framework.

SB 808 (2025): Fast-Tracks Judicial Review of Housing Permit Denials

Problem addressed: Cities continue denying compliant housing projects, forcing applicants into a slow judicial review process where litigation delays—often lasting years—kill projects, escalate costs, or allow permits to expire.

Solution: Establishes an expedited writ-of-mandate process for housing permit denials. Requires:

- Local agencies to compile and certify the administrative record within 15 days.
 - Courts to set hearings within 45 days and issue decisions within 30 days of submission (or 75 days from filing, whichever comes first).
 - Priority scheduling for appeals.
- Allows the applicant, Attorney General, or HCD to file the petition; authorizes temporary judicial assignments to meet deadlines.

Role: A litigation-acceleration tool that prevents local agencies from using procedural delay to kill housing projects, ensuring that California housing laws have immediate, enforceable consequences. Complements AB 712 by enforcing housing rights on the judicial side.

SB 786 (2025): Clarifies Housing Element Law and Strengthens Court Remedies Against Noncompliant Cities

Problem addressed: Conflicts between General Plan elements, vague housing-element rules, and slow litigation processes create uncertainty for cities, courts, and developers—leading to delays, stalled rezoning, and litigation bottlenecks that block housing production.

Solution: Establishes clear hierarchy rules: when General Plan elements conflict—including quantified development standards—the most recently adopted, HCD-certified Housing Element controls. Tightens judicial timelines in Housing-Element challenges:

- Limits continuances to 60 days,
 - Requires temporary relief whenever continuances occur,
 - Requires HCD to conduct substantial-compliance reviews when local jurisdictions miss required Housing-Element deadlines,
 - Extends rezoning compliance timelines to 120 days and mandates sanctions if jurisdictions fail to comply.
- Applies general-plan challenge rules to charter cities.

Role: A statewide governance-and-compliance tool ensuring that Housing Elements actually function as the controlling document, reducing litigation gamesmanship, and compelling jurisdictions to implement rezoning and Housing-Element obligations on enforceable timelines. Complements AB 712 and SB 808 as part of the Attorney General’s statewide enforcement strategy.

SB 340 (2025): Expands Emergency Shelter Requirements in Housing Elements

Problem addressed: Emergency shelter planning requirements were outdated and limited, failing to reflect modern shelter models (e.g., navigation centers, recuperative care) and the full range of onsite supportive services needed for effective homelessness response.

Solution: Updates the definition of “emergency shelter” to require housing *with supportive services* (not minimal services) and requires Housing Elements to account for all onsite services consistent with written, objective standards. Imposes new obligations on cities/counties in shelter planning and broadens the Emergency Housing and Assistance Program definition.

Role: A homelessness-response modernization tool ensuring jurisdictions plan realistically for service-rich shelter models within their Housing Elements and zoning designations.

AB 610 (2025): Requires Disclosure of New Local Governmental Constraints in Housing Elements

Problem addressed: Cities and counties were adopting new land-use constraints (fees, ordinances, zoning rules) during Housing-Element cycles without disclosure, undermining RHNA compliance and increasing barriers to housing production.

Solution: Requires a governmental constraints disclosure statement in each Housing Element (7th Cycle onward), identifying all new or amended constraints adopted since the last Housing Element. Prohibits adoption of new constraints unless they were disclosed and the jurisdiction has completed all required programs to remove past constraints (except when mandated by state/federal law). Applies to charter cities.

Role: A transparency and anti-backsliding tool ensuring local governments cannot quietly increase barriers to housing once RHNA obligations are set.

AB 670 (2025): Allows Converted Affordable Units to Count Toward RHNA Reporting

Problem addressed: Cities lacked credit in their Annual Progress Reports (APRs) for preserving or converting multifamily buildings into long-term deed-restricted affordable housing, despite this being a major preservation strategy.

Solution: Expands APR reporting starting in 2027 to allow units converted to affordable housing—with 55-year covenants for low, very low, extremely low, or acutely low income households—to count toward a jurisdiction's RHNA-creditable progress, if they meet specified criteria. Includes detailed new reporting requirements for demolitions, replacement units, and affordable conversions.

Role: A preservation-credit tool aligning RHNA reporting with long-term affordable housing conversion strategies, encouraging cities to preserve expiring-affordability stock.

AB 726 (2025): Allows Cities to Count Substantial Rehabilitation of Affordable Units in APRs

Problem addressed: Deeply affordable older units (often 15+ years old) need major rehabilitation but cities receive *zero RHNA/APR credit* for investing in repairs—causing cities to prioritize new construction instead of preserving aging stock.

Solution: Allows jurisdictions to include substantially rehabilitated deed-restricted affordable units (≥15 years old, ≤45% AMI average affordability, ≥\$60k local investment per unit) in APRs. These units cannot be counted toward eligibility for streamlining under SB 35. Updates references to the Office of Land Use and Climate Innovation.

Role: A preservation-incentive tool enabling cities to earn APR credit for rehabilitating deeply affordable units, helping maintain long-term housing quality and prevent affordable-stock losses.

AB 1275 (2025): Extends RHNA Timelines and Aligns Housing Needs with Transportation Plans

Problem addressed: Regional Housing Needs Determinations (RHND) were rushed due to tight timelines (2-year lead time), leading to disputes, insufficient data review, and disconnects between transportation planning and housing allocations.

Solution: Extends RHND timeline from 2 to 3 years before a Housing-Element update (with special rules for 2027–2029 cycles), requires earlier consultation between HCD and councils of governments (COGs), and mandates that RHNA methodology be informed by Sustainable Communities Strategy (SCS) patterns in regional transportation plans. Strengthens integration of job-housing balance, mobility patterns, and fair housing objectives.

Role: A regional-planning alignment tool ensuring RHNA allocations better reflect transportation, climate, and job-housing realities, improving the planning accuracy of future housing cycles.

SB 233 (2025): Requires Earlier State–Regional Consultation for RHNA Determinations

Problem addressed: During prior RHNA cycles, HCD provided regional housing need numbers too late (26-month timeline), leaving councils of governments (COGs) and cities with insufficient time to plan, contributing to widespread late Housing-Element adoption.

Solution: Requires HCD to meet and consult with each COG at least 38 months before a Housing-Element revision (one year earlier than prior law), with special rules for the 7th Cycle. Ensures earlier agreement on RHNA assumptions, methodologies, and data inputs.

Role: A regional-planning coordination tool that expands the planning window for local governments, reducing delays, improving RHNA accuracy, and increasing likelihood of timely Housing-Element compliance.

AB 920 (2025): Requires Centralized Online Portals for Housing Permit Applications

Problem addressed: Local permitting processes were opaque, slow, and inconsistent across cities; applicants could not easily track housing development permits, resulting in delays, confusion, and high administrative burdens.

Solution: Requires cities/counties with populations ≥150,000 to create a centralized online application portal for housing development projects, allowing electronic submissions and real-time status tracking.

Jurisdictions may delay implementation until 2030 only if they begin procurement by 2028. Applies to charter cities.

Role: A statewide digital-permit modernization tool that increases transparency, reduces processing delays, and standardizes how applicants navigate housing approvals.

SB 358 (2025): Reduces Traffic Impact Fees for Transit-Oriented Housing

Problem addressed: Traffic impact fees—often 20% of project cost—were applied using outdated auto-trip assumptions, inflating costs for infill and transit-oriented housing that generates fewer vehicle trips.

Solution: Reforms the Mitigation Fee Act to:

- Require at least 50% fee reductions for qualifying transit-oriented housing,
- Update eligibility criteria (parking maximums, proximity to ≥3 amenities, transit-priority locations),
- Require fee-denial findings to be supported by substantial evidence,
- Remove outdated convenience-retail requirements and proportional-fee provisions.

Role: A cost-reduction and TOD-incentive tool that aligns traffic fees with actual impacts, supporting infill and climate-oriented housing production.

AB 752 (2025): Makes Child Daycare Centers in Multifamily Housing a Use-by-Right

Problem addressed: Cities treated daycare centers co-located with multifamily housing as commercial uses—triggering zoning barriers, business license fees, CEQA review, and inconsistent local requirements, reducing childcare capacity near where families live.

Solution: Makes daycare centers co-located with multifamily housing or community amenities a residential use by right; prohibits business license fees; exempts such centers from CEQA; bars stricter standards on them than those applied to the co-located housing or amenity. Maintains all California licensing and safety requirements.

Role: A childcare-access and land-use integration tool that reduces barriers to collocated daycare centers, supporting housing-adjacent amenities and family-serving communities.

SB 415 (2025): Refines Statewide Warehouse & Logistics Development Standards

(Not a housing production bill but affects land-use and zoning environments related to freight-adjacent communities.)

Problem addressed: AB 98 (2024) established statewide warehouse standards but included ambiguous definitions and inconsistent requirements, creating confusion for local governments, developers, and environmental-justice communities in logistics-heavy regions.

Solution: SB 415 clarifies key definitions (“logistics use development,” “sensitive receptor”), narrows exemptions, updates siting and truck-route standards, refines buffer requirements, and ensures 21st-century warehouses meet applicable sustainable-design standards at permit issuance. Also clarifies where warehouse concentration regions apply.

Role: A land-use-governance and environmental-mitigation tool improving clarity and enforceability of statewide logistics-facility regulations—reducing conflicts between freight operations, housing, and community health.

AB 98 (2024–2025): Establishes Statewide Design, Siting & Environmental Standards for Logistics Facilities

Problem addressed: Warehouse and logistics developments—especially in the Inland Empire—were producing severe air-quality, noise, traffic, and public-health impacts on nearby residential areas, schools, and other sensitive receptors, while local regulations were inconsistent or ineffective.

Solution: Creates California's first statewide design, siting, and operational standards for logistics facilities, including:

- Mandatory buffers (500–900 feet) from sensitive receptors,
 - Truck-route and loading-bay orientation requirements,
 - Anti-idling measures and cold-storage plug-ins,
 - Title 24–level building efficiency standards (solar, EV-readiness),
 - 2:1 replacement requirement for recently occupied affordable units demolished,
 - Applicability to large new facilities and expansions ≥20% of floor area.
- Compliance required for applications submitted after Sept. 30, 2024, with most standards fully effective Jan. 1, 2026.

Role: A statewide environmental-mitigation and freight-land-use tool aimed at protecting communities while aligning logistics growth with sustainability and public-health goals. AB 98 is foundational to later cleanup legislation (SB 415).

AB 1007 (2025): Cuts Responsible-Agency Permit Deadlines in Half

Problem addressed: Even after cities approved housing projects, state and regional “responsible agencies” (e.g., air districts, water boards) could take months to issue secondary permits, causing ballooning timelines and costs. Shot-clocks for these agencies (90 days) were much longer than those for lead agencies.

Solution: Amends the Permit Streamlining Act to require responsible agencies to approve/disapprove residential, mixed-use, supportive, or farmworker housing permits within 45 days of project approval or application completeness—cutting the prior 90-day deadline in half. Applies statewide, including charter cities.

Role: A permitting-acceleration tool ensuring faster post-entitlement approvals and reducing interagency delays that frequently stall housing construction.

AB 1050 (2025): Allows Removal of Private Covenants Blocking Housing on Commercial Properties

Problem addressed: Commercial parcels often have old CC&Rs and reciprocal easement agreements (REAs) that prohibit residential uses or limit density, preventing commercial-to-housing adaptive-reuse projects—even when allowed under State housing laws like AB 2011.

Solution: Expands existing restrictive-covenant-modification law (previously limited to affordable housing) to **all** qualifying housing developments located on commercial sites, allowing developers to:

- Invalidate covenants that restrict residential use, density, unit count, or occupancy,
- Apply the process to REAs as well as CC&Rs,
- Record a Restrictive Covenant Modification Document after county counsel review.

Does not authorize projects inconsistent with state housing laws.

Role: A statewide barrier-removal tool enabling adaptive reuse of commercial corridors and shopping centers into housing by preempting private land-use restrictions.

SB 92 (2025): Closes Loopholes in the Density Bonus Law for Mixed-Use Projects

Problem addressed: Developers exploited the Density Bonus Law to exceed commercial FAR and build oversized hotel-heavy or visitor-serving mixed-use projects with minimal housing (e.g., San Diego “Project Vela”).

Solution: Reforms Density Bonus Law by:

- Limiting commercial FAR increases under DBL to **≤2.5×** base zoning,
- Prohibiting incentives/waivers for transient lodging (hotels, motels, B&Bs) except residential hotels,

- Requiring $\geq 2/3$ of mixed-use square footage to be residential to qualify,
- Maintaining full affordability thresholds for bonus eligibility.

Effective Jan. 1, 2026 (with grandfathering for pre-application projects).

Role: A guardrail tool ensuring Density Bonus Law is used to build actual housing—not oversized hotel or commercial space leveraged through affordable-unit “tokenism.”

AB 87 (2025): Prevents Density Bonus Incentives for Hotel Components of Mixed-Use Projects

Problem addressed: Developers were using DBL concessions (height, FAR, parking waivers) to benefit hotel components of mixed-use projects, diluting the State’s housing incentives and enabling visitor-serving developments that undermined local zoning.

Solution: Clarifies that DBL incentives may not be applied to hotel/motel/visitor-serving portions of a mixed-use project. Makes parallel conforming amendments to align with SB 92 if both bills are enacted. Applies statewide, including charter cities.

Role: A housing-priority tool reinforcing that density bonuses are for residential production—not for hospitality or tourism development.

APPENDIX B: Orange County Housing Mandate Survey Questions

- Q1** What is your city’s 6th-cycle RHNA allocation, and does your Housing Element plan exceed that number? If so, by how much, and what factors influenced the decision to exceed the allocation?
- Q2** If the RHNA mandate were not in place, how would your housing plan differ? Would it still meet the demand for low-income housing?
- Q3** What strategies has your city used to inform and engage residents about the state housing mandate? How do you measure the effectiveness of these outreach efforts?
- Q4** What are the implications of recent state legislation on R-1 single-family zoning for your city’s land-use policies and community character?
- Q5** What are the most significant challenges your city faces in meeting RHNA requirements? In what ways has OCCOG supported your efforts to overcome these challenges?
- Q6** Do you anticipate achieving your approved Housing Element goals by the end of the 6th cycle in 2030? What factors will most influence your success or shortfall?
- Q7** What additional information would you like to provide us regarding this topic?

APPENDIX C: Responsibilities

Responsibilities of OCCOG

Mission Statement:

The Orange County Council of Governments (OCCOG) convenes jurisdictions throughout Orange County to collaboratively address land use, housing, mobility, energy, air quality, and water issues, and to ensure that Orange County is effectively represented in regional and state decision-making. Through sound governance, impartial analysis, and regional coordination, OCCOG delivers value to its member agencies and the residents of Orange County.

Core Responsibilities:

1. Sub-Regional Planning and Coordination
 - a. Serves as Orange County’s official sub-regional planning organization within the six-county SCAG region.

- b. Leads the preparation of required regional and sub-regional planning documents that allow Orange County jurisdictions to compete for state and federal funding. [occog.com], [occog.com]
2. Regional Representation and Advocacy
 - a. Ensures Orange County's interests are represented in regional policy development by coordinating the county's representation on the SCAG Regional Council and committees.
 - b. Works to align countywide perspectives on policy issues affecting transportation, housing, sustainability, and infrastructure.
3. Housing, Transportation, and Sustainable Communities Planning
 - a. Supports housing and transportation planning coordination, including RHNA-related activities and implementation discussions.
 - b. May serve as the lead agency for a sub-regional Sustainable Communities Strategy if Orange County elects to pursue one under SB 375, consistent with SCAG's Regional Transportation Plan.
4. Technical Analysis, Studies, and Data Support
 - a. Conducts countywide and sub-regional studies, prepares technical reports, and provides data-driven analysis to support policymaking by member agencies.
 - b. Develops best-practice guidance (e.g., Complete Streets, mobility and infrastructure tools) for voluntary adoption by cities and the County.
5. Intergovernmental Collaboration and Consensus-Building
 - a. Functions as a forum for cooperation among cities, the County, and special districts on issues of shared concern.
 - b. Facilitates coordination on funding strategies, infrastructure planning, and policy alignment without supplanting local land-use authority.⁸²

Responsibilities of SCAG

Mission Statement

The Southern California Association of Governments (SCAG) serves as the regional planning agency for Southern California, coordinating among local, regional, state, and federal partners to advance transportation, housing, land-use, and environmental planning that supports sustainable growth, economic vitality, social equity, and improved quality of life for the region's diverse communities.

SCAG's mission is to lead collaborative regional planning by developing and implementing integrated transportation, housing, and sustainability strategies; allocating regional housing needs; ensuring compliance with state and federal planning requirements; and providing data, technical assistance, and policy guidance to its member jurisdictions to address Southern California's long-term growth challenges.⁸³

Responsibilities of HCD

Mission Statement (Primary)

The California Department of Housing and Community Development (HCD) works to ensure safe, affordable, and sustainable housing opportunities for Californians by administering housing programs,

⁸² [Orange County Council of Governments](#)

⁸³ [Home | Southern California Association of Governments](#)

shaping statewide housing policy, and enforcing housing laws to promote equity, environmental quality, and community stability across the state.

HCD's mission is to lead and implement California's housing policy by determining regional housing needs, reviewing and enforcing Housing Element compliance, administering state and federal housing funds, and holding local jurisdictions accountable for fulfilling their obligations under state housing law.⁸⁴

⁸⁴ [California Department of Housing and Community Development](#)



PFAS and Public Awareness

A Closer Look at
Orange County Drinking Water



Orange County Grand Jury 2025-2026

TABLE OF CONTENTS

SUMMARY	5
BACKGROUND	5
REASON FOR STUDY	8
METHOD OF STUDY.....	8
INVESTIGATION AND ANALYSIS	9
FINDINGS	35
RECOMMENDATIONS	36
COMMENDATIONS	37
REQUIRED RESPONSES	39
Acronyms	46
Glossary	50
Bibliography	51
Appendix A	55
Appendix B.....	62

FIGURES

Figure 1 - Potential Major Exposure Pathways of PFAS to Humans	6
Figure 2 - Orange County Groundwater Public Supply Wells.....	11
Figure 3 - Orange County Water District (OCWD) Service Area	12
Figure 4 - Municipal Water District of Orange County (MWDOC) Service Area	13
Figure 5 - The PFAS Cycle.....	15
Figure 6 - Wastewater Treatment Discharges to the Santa Ana River	16
Figure 7 - CDC Multi-site Study Site Orange County, CA.....	17
Figure 8 - Average PFAS Levels in Blood, CDC Multi-site Study Virtual Open House, July 2025.....	18
Figure 9 - How are people exposed to PFAS?	20
Figure 10 - Are PFAS Safe?	22
Figure 11 - Highest PFAS Detections Among All OCWD Sources During UCMR 3 and UCMR 5 Monitoring Cycles.....	24

Figure 12 - Highest PFAS Detections Among All OCWD Sources Listed on Each SWRCB Monitoring Order Exhibit A	25
Figure 13 - PFAS Rule Enforceable Maximum Contaminant Levels and Maximum Contaminant Level Goals	27
Figure 14 - Timeline of OCWD Response to PFAS in the Santa Ana River Basin	29
Figure 15 - Map of Current and Future PFAS Treatment Locations	30
Figure 16 - Approximate PFAS Capital Funding Sources	31
Figure 17 - Summary of PFAS Treatment Facilities	32
Figure 18 - OCWD Share of PFAS Treatment Facility Annual O&M Cost	33
Figure 19 - PFAS Monthly Cost to OCWD Service Area Residents	34
Figure 20 - UCMR 3 Contaminants List, PFAS Contaminants	55
Figure 21 - UCMR 5 Contaminants List, PFAS Contaminants	56
Figure 22 - SWRCB PFAS General Monitoring Orders Issued 2020 through 2025	57
Figure 23 - SWRCB General Monitoring Order 2020-0003-DDW, PFAS Constituents .	58
Figure 24 - SWRCB General Monitoring Order 2021-0001-DDW, PFAS Constituents .	59
Figure 25 - SWRCB General Monitoring Order 2022-0001-DDW, PFAS Constituents .	60
Figure 26 - SWRCB General Monitoring Order 2025-0002-DDW, PFAS Constituents .	61
Figure 27 - EPA Eight Content Requirements of a Consumer Confidence Report	62

SUMMARY

Per- and Polyfluoroalkyl Substances (PFAS) form a broad class of thousands of synthetic chemicals characterized by strong carbon–fluorine bonds and are among the most durable compounds in organic chemistry. This bond strength makes PFAS highly resistant to breaking down, allowing them to persist in the environment for decades or longer. Because of this persistence, PFAS are often called “forever chemicals.”

Various industries have used PFAS in consumer and commercial applications since the 1940s because their chemical properties provide water, oil, and stain resistance, as well as heat stability. These properties support applications across numerous sectors, including aerospace, automotive, textiles, firefighting foams, food packaging, electronics, and medical devices. As a result of their widespread use and persistence, PFAS now appear globally in water, air, soil, wildlife, and human blood.

Scientific studies continue to show associations between PFAS exposure and harmful health effects in humans and animals, although the degree of risk varies by compound. In response, federal and state agencies, including the United States Environmental Protection Agency (EPA) and the United States Food and Drug Administration (FDA), began accelerating regulatory actions in the 2010s to reduce PFAS exposure, enhance monitoring, and develop treatment and disposal methods.

This report identifies and describes PFAS levels detected by Orange County drinking water agencies. It evaluates how these agencies have responded to recent PFAS regulatory requirements. It also examines the progress of PFAS treatment facility planning and installation, along with implementation of public education programs related to PFAS in drinking water. This report’s findings and recommendations aim to strengthen PFAS reporting in annual Water Quality Reports (Consumer Confidence Reports) and expand public outreach by Orange County drinking water agencies.

BACKGROUND

PFAS are a large group of man-made “forever chemicals” produced since the 1940s, known for extreme persistence, environmental mobility, and bioaccumulation due to strong carbon-fluorine bonds.¹ Used in water/stain-resistant coatings, firefighting foams, industrial processes, PFAS have contaminated soil, water, and air globally.

¹ Elsie M. Sunderland, et al., “A review of the pathways of human exposure to poly- and perfluoroalkyl substances (PFASs) and present understanding of health effects,” *Journal of Exposure Science & Environmental Epidemiology*, November 23, 2018, accessed March 16, 2026, https://sunderlandlab.org/assets/sunderland_jeseerev_2018wsi.pdf.

Contaminated drinking water has led to high levels of exposure to PFOA, PFOS, and other PFAS² for some populations residing near manufacturing facilities. Workers in facilities that make or use PFAS can be exposed to higher amounts of these chemicals and have higher levels in their blood.³ Infants may be exposed to PFAS through breastfeeding.⁴

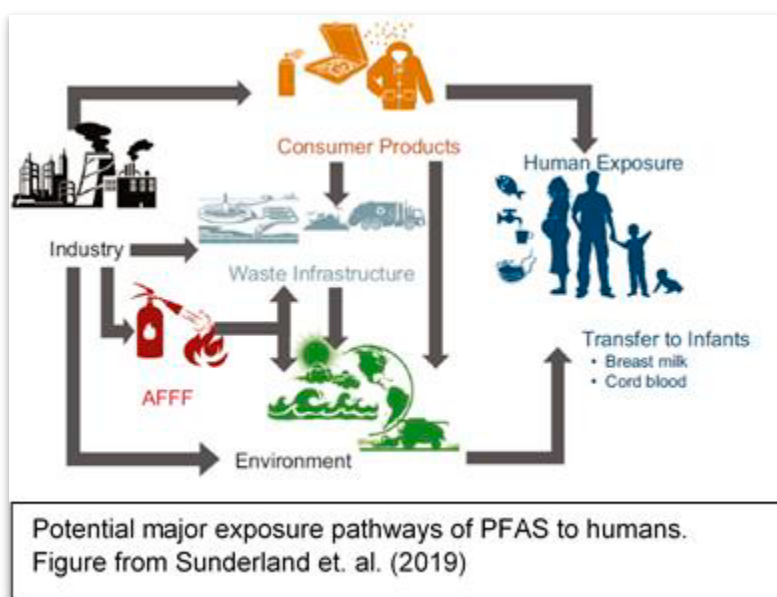


Figure 1 - Potential Major Exposure Pathways of PFAS to Humans⁵

PFAS, especially PFOA and PFOS, have been detected in air, water, and soil in and around manufacturing facilities. However, these releases have been declining since companies began phasing out the production and use of several PFAS in the early 2000s.⁶ Due to their chemical structure, PFAS are very stable in the environment and are resistant to breaking down. Some PFAS are volatile and can be carried long distances through the air, which may lead to contamination of soils and groundwater far from the source of the PFAS emission.⁷

The four major sources of PFAS are: fire training/fire response sites, industrial sites, landfills, and wastewater treatment plants/biosolids. PFAS can get into drinking water when products containing them are used or spilled onto the ground or into lakes and rivers. Once in groundwater, PFAS are easily transported long distances and can

² Kyle Steenland, Tony Fletcher, and David A. Savitz, "Epidemiologic Evidence on the Health Effects of Perfluorooctanoic Acid (PFOA)," *National Library of Medicine*, accessed May 12, 2026, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2920088/>.

³ Sunderland, "A review of the pathways of human exposure."

⁴ Ibid.

⁵ Ibid.

⁶ Ibid.

⁷ "Frequently Asked Questions (FAQs) PFAS General," California State Water Resources Control Board, March 4, 2019, https://www.waterboards.ca.gov/pfas/docs/pfas_general_faq.pdf.

contaminate drinking wells. PFAS in the air can also end up in rivers and lakes used for drinking water.⁸

PFAS have been used extensively in surface coating and protectant formulations due to their unique ability to repel oil, grease, and water. Major applications have included protectants for paper and cardboard packaging products, carpets, leather products, and textiles that enhance water, grease, and soil repellency, and in firefighting foams. PFAS have also been used as processing aids in the manufacture of nonstick coatings on cookware. Common consumer products containing PFAS include Teflon, Gore-Tex and Scotchgard.⁹

Background Summary of PFAS and Its Effects

Source and Exposure: Primary sources include industrial sites, firefighting training, landfills, and wastewater treatment plants. They enter drinking water, food, and indoor dust, resulting in widespread human exposure.

Health and Environmental Impact: PFAS are associated with adverse effects, including cancer (i.e. testicular, kidney), developmental delays, liver damage, and high cholesterol. They do not break down easily, leading to "background" contamination even in remote areas.¹⁰

Regulation and Action: While major US manufacturing of certain PFAS ended around 2015, they remain in products and in the environment. The EPA has established Maximum Contaminant Levels (MCLs) for drinking water.¹¹

"Forever Chemicals" Definition: Their chemical structure, featuring one of the strongest bonds in organic chemistry, makes them resistant to heat, water, and oil, thus earning them the nickname "forever chemicals."¹²

In Orange County, PFAS have been detected in the **Orange County Groundwater Basin**, which provides 77% to 85% of the drinking water for north and central parts of the county. Local agencies have taken a proactive stance, shutting down dozens of impacted wells and building some of the nation's largest treatment facilities to ensure tap water meets safety standards.¹³

⁸ "PFAS background," California State Water Resources Control Board, January 14, 2025, <https://www.waterboards.ca.gov/pfas/background.html>

⁹ Ibid.

¹⁰ "PFAS Explained," EPA, accessed March 11, 2026, <https://www.epa.gov/pfas/pfas-explained>.

¹¹ "Per- and Polyfluoroalkyl Substances (PFAS), Final PFAS National Primary Drinking Water Regulation," Accessed May 12, 2026, <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>.

¹² Ibid.

¹³ University of California, Irvine, "UCI PFAS Health Study, Frequently Asked Questions," accessed May 12, 2026, <https://sites.uci.edu/pfas/frequently-asked-questions/>.

REASON FOR STUDY

Recent regulatory actions related to PFAS have created significant operational, financial, and communication challenges for drinking water agencies across California. Orange County agencies face an intensifying timeline due to the region's reliance on groundwater supplies, the presence of PFAS in local aquifers, and the need to comply with evolving state and federal standards. As regulatory and monitoring requirements expand, agencies must rapidly adapt their treatment strategies, capital planning, and public outreach efforts.

This study is necessary to provide a clear, up-to-date understanding of how Orange County drinking water agencies are responding to these new requirements. Evaluating the status of PFAS treatment planning and installation helps illustrate the extent of infrastructure readiness, the pace of implementation, and the challenges agencies encounter as they work to bring new systems online. At the same time, assessing the development and delivery of PFAS-related education programs offers insight into how effectively agencies are communicating risks, regulatory changes, and water quality information to the public.

By documenting current conditions and identifying gaps or emerging needs, the study supports informed decision-making among water providers, policymakers, and ratepayers. This work helps ensure that Orange County communities receive safe drinking water and that agencies are equipped to meet regulatory expectations while maintaining public trust.

METHOD OF STUDY

The Orange County Grand Jury investigated the PFAS in Orange County drinking water to provide a clear and accurate assessment. The Grand Jury based its study on a comprehensive review of multiple sources, including interviews, public records, field investigations, and relevant news articles. Multiple independent sources corroborated and validated all facts, findings, and recommendations presented in the report.

- Interviewed several Orange County governmental leaders and senior staff directly involved in managing drinking water quality
- Reviewed and analyzed key documents related to the investigation, including:
 - Published Water Quality reports from all Orange County water retailers
 - Records from all Orange County water agencies
- Examined news articles and publications relevant to the topic.
- Conducted extensive internet research.

- Performed field investigations in which Grand Jury members visited several water management agencies to directly observe and assess drinking water processes.

INVESTIGATION AND ANALYSIS

The 2025-2026 Orange County Grand Jury investigated the presence of PFAS in Orange County drinking water and the response of Orange County community water systems. Community water systems (CWS) are city, county, regulated utilities, regional water systems and even small water companies and districts where people live. Non-community water system.¹⁴ Provide drinking water to the public at locations where people do not reside permanently. The investigation included evaluation of Orange County CWS compliance with federal and state PFAS monitoring and reporting requirements and the extent of the voluntary response to PFAS contamination. The Grand Jury also evaluated annual Consumer Confidence Reports, also called Annual Water Quality Reports, which are issued annually by CWS and distributed to their customers.

Orange County Drinking Water Systems

The Grand Jury investigation was limited to community water systems (CWS) operated by cities or special districts that are regulated under the Safe Drinking Water Act.¹⁵ CWS are defined as public water systems that serve at least 15 service connections used by yearlong residents, or regularly serve at least 25 yearlong residents of the area served by the system.¹⁶ In Orange County, there are 31 such CWS that are operated by cities or special districts and that sell drinking water directly to customers on a retail basis. In this report, these Orange County CWS may be referred to as retail water districts or water retailers.

Drinking Water Sources

North and Central Orange County

Orange County is divided into two distinct areas when it comes to drinking water sources. There are 2.5 million residents of north and central Orange County, who receive about 85% of their drinking water supplies from the Orange County Groundwater Basin, and the remaining 15% of their water supplies are imported from

¹⁴ "California Code, Health and Safety Code - HSC § 116275," FindLaw, accessed May 21, 2026, <https://codes.findlaw.com/ca/health-and-safety-code/hsc-sect-116275/>.

¹⁵ "Summary of the Safe Drinking Water Act," EPA, describing statutory authority at 42 U.S.C. § 300f et seq., accessed May 21, 2026, <https://www.epa.gov/laws-regulations/summary-safe-drinking-water-act>.

¹⁶ "California Code, Health and Safety Code - HSC § 116275," FindLaw.

the State Water Project and Colorado River delivered by Municipal Water District of Orange County (MWDOC).¹⁷

South Orange County

Approximately 600,000 residents of south Orange County rely primarily on imported water supplies delivered by MWDOC, and a few south County communities also have groundwater supplies from the San Juan Basin and surface water supplies from Irvine Lake (also referred to as the Santiago Reservoir).¹⁸

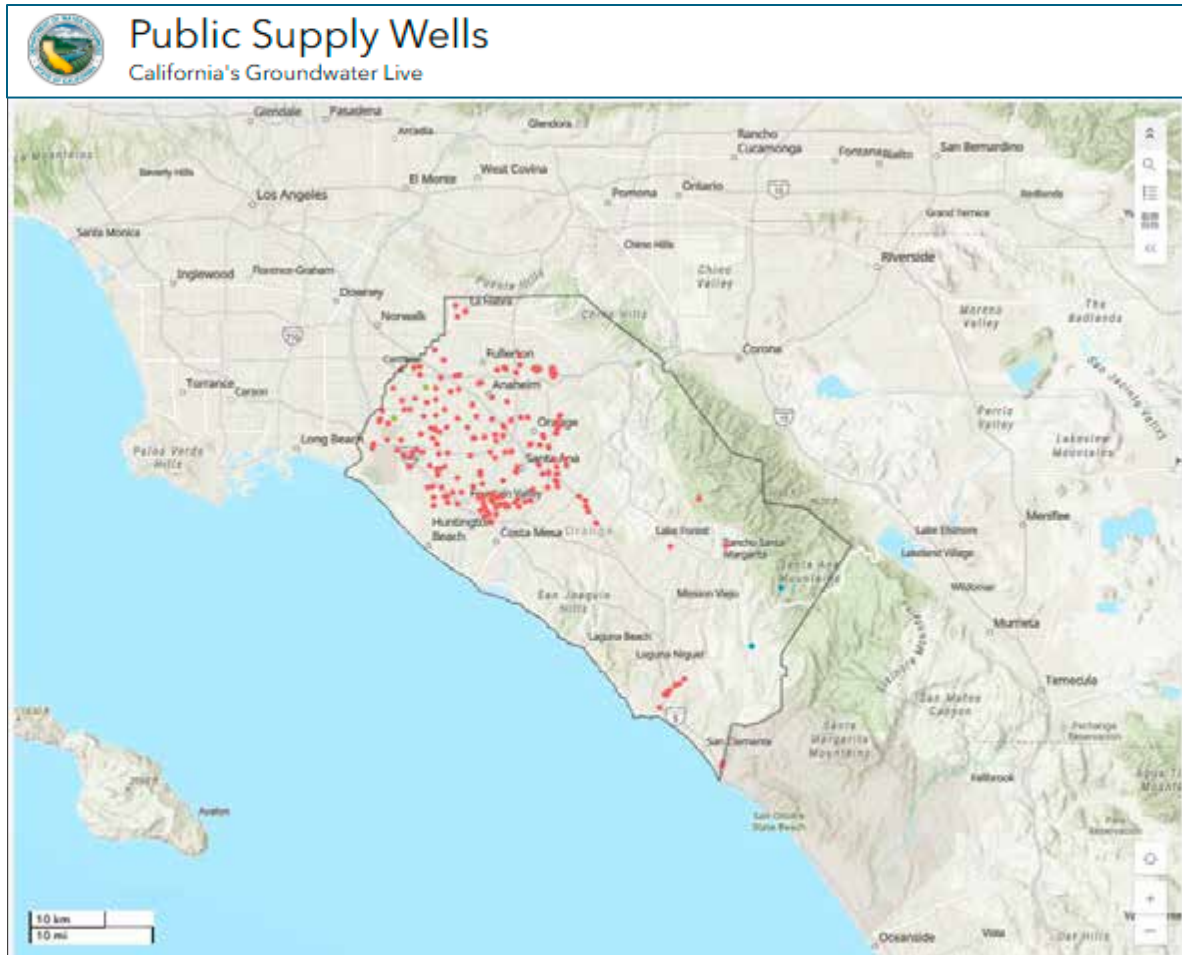
Public Supply Wells

According to the California Department of Water Resources (DWR) as of November 2024,¹⁹ there were a total of 217 public supply wells for drinking water in Orange County. Of the 217 total wells, 211 were CWS wells and six were non-community water system wells. See Figure 2 for a Department of Water Resources map of Orange County groundwater public supply wells. This map illustrates the reliance of north and central Orange County on groundwater sources, and the reliance of south Orange County on imported water supplies.

¹⁷ “How water works in Orange County,” OCWD, accessed May 21, 2026, <https://www.ocwd.com/learning-center/how-water-works-in-oc/>.

¹⁸ Ibid.

¹⁹ “California’s Groundwater Live: Well Infrastructure,” California Department of Water Resources, accessed April 13, 2026, <https://storymaps.arcgis.com/stories/f2b252d15a0d4e49887ba94ac17cc4bb>.



Source: State of California, Department of Water Resources

Figure 2 - Orange County Groundwater Public Supply Wells

Orange County Water District

Orange County Water District (OCWD) manages the Orange County Groundwater Basin to ensure sustainable use through replenishment of groundwater and delivery of water supplies to its 19 member agencies. Some OCWD member agencies are also members of MWDOC.

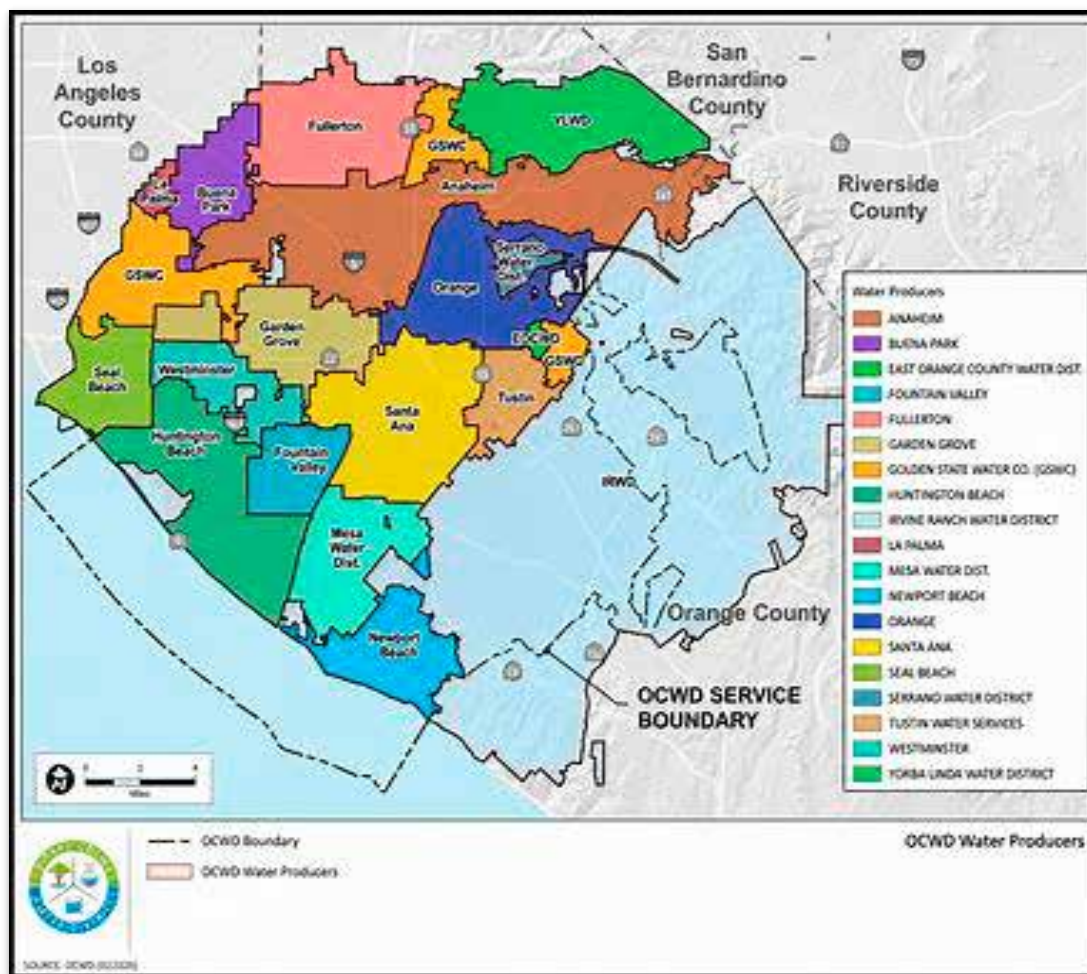


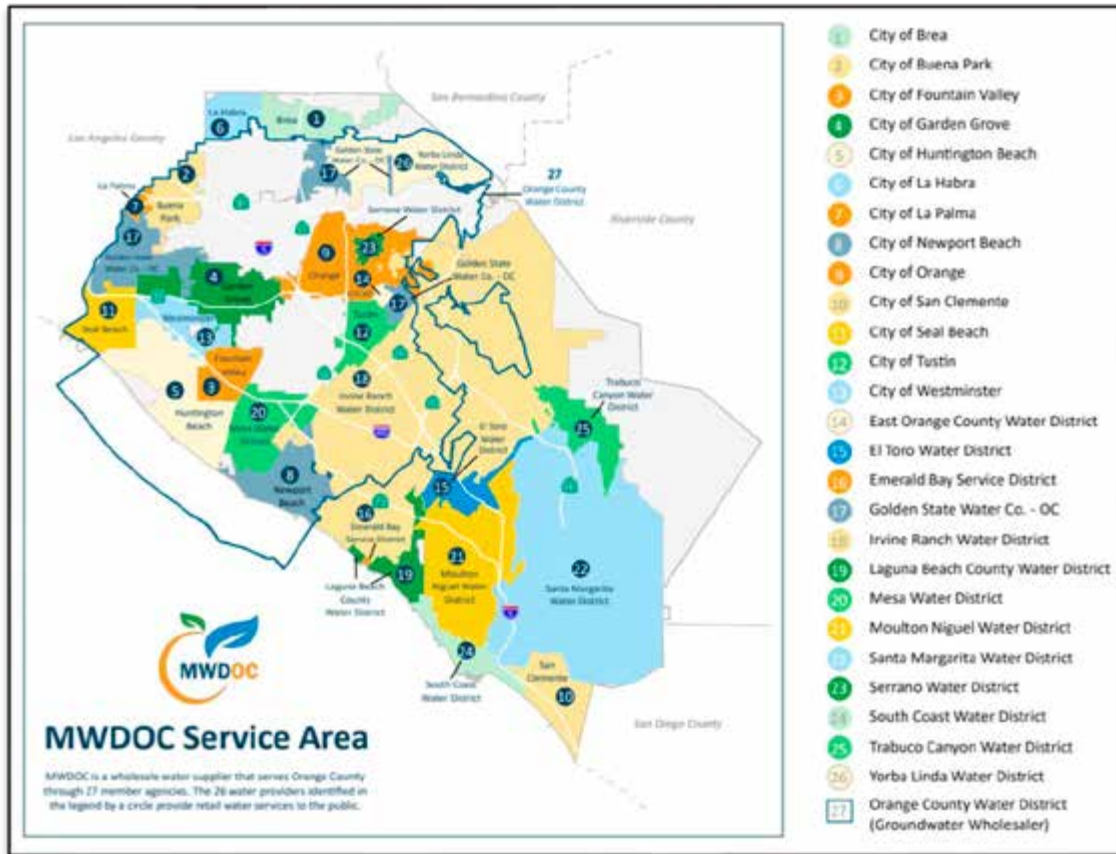
Figure 3 - Orange County Water District (OCWD) Service Area

Municipal Water District of Orange County

5

MWDOC is the wholesale water provider and resource planning agency that partners with the Metropolitan Water District of Southern California (MWD) to deliver imported water to its 27 member agencies.²⁰ Some MWDOC member agencies are also members of OCWD.

²⁰ "How water works in Orange County," OCWD.



Source: MWD OC

Figure 4 - Municipal Water District of Orange County (MWD OC) Service Area

PFAS and the Health Effects of Exposure

What are PFAS?

PFAS are a large group of many thousands of manufactured chemicals that are resistant to heat, oil, and water. Among the many thousands of different PFAS, some have been more widely used and studied than others.²¹ PFAS have been used extensively in surface coating and protectant formulations due to their unique ability to reduce the surface tension of liquids, and their ability to repel oil, grease, water, and staining. Major applications have included use as processing aids in the manufacture of nonstick coatings on cookware, surface protectants for paper and cardboard such as disposable food packaging, microwave popcorn bags, pizza boxes, and candy wrappers. Other surface protectants include those used on furniture and carpets,

²¹ "PFAS Explained," EPA.

leather products, outdoor gear, and textiles.²² PFAS are also one of the main components of aqueous film forming foams (AFFF) used frequently at airports and military bases for firefighting and emergency response training activities.²³ It is important to note that PFAS-containing firefighting foams and other emergency response materials containing PFAS are no longer in use at Orange County airports and harbors.²⁴

PFOA and PFOS are two types of PFAS of particular concern that are no longer manufactured or imported into the US. Trace amounts of PFOA and PFOS may still be contained in some imported goods and in other PFAS goods and materials that are still produced and used in the US.²⁵ Under the PFOA Stewardship Program with the EPA, eight major PFAS producers have phased out PFOA and other PFAS substances from their emissions and products; however, manufacturers are replacing substances in the PFAS family with others such as GenX and ADONA.²⁶

Understanding the PFAS Cycle: How PFAS Moves Through the Environment

PFAS move through the environment in a repeating cycle through air, water, soil, products, animals, and humans. This is known as the PFAS cycle. This cycle can be described in four stages and is illustrated at Figure 5.²⁷

Manufacturing and use. The PFAS cycle begins during manufacturing or everyday use of PFAS-containing consumer and industrial products. During manufacture and use, PFAS are released into the air, water, and soil. As more PFAS are manufactured and used, the more they accumulate because they are persistent and resistant to degradation.

Environmental spread. After PFAS are released to the environment, they move through wind, snowfall, rain, and runoff to soil and surface water, and infiltration to groundwater. Industrial sites and wastewater treatment plants are key entry points

²² “Our Current Understanding of the Human Health and Environmental Risks of PFAS,” EPA, Accessed May 21, 2026, <https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas>.

²³ Sunderland. “A review of the pathways of human exposure.”

²⁴ “SB-1044 Compliance: Phasing Out PFAS in Class B Firefighting Foam,” CAL FIRE, accessed April 17, 2026, <https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/fire-fighting-equipment-and-foam-pfas>.

²⁵ “PFAS – Frequently Asked Questions,” California State Water Resources Control Board Division of Water Quality (SWRCB), 5, [3] 3M Company, “Fluorochemical use, distribution and release overview,” AR226-0550, 1999, updated March 19, 2020, accessed March 25, 2026, https://www.waterboards.ca.gov/pfas/docs/master_pfas_faq_mar.pdf.

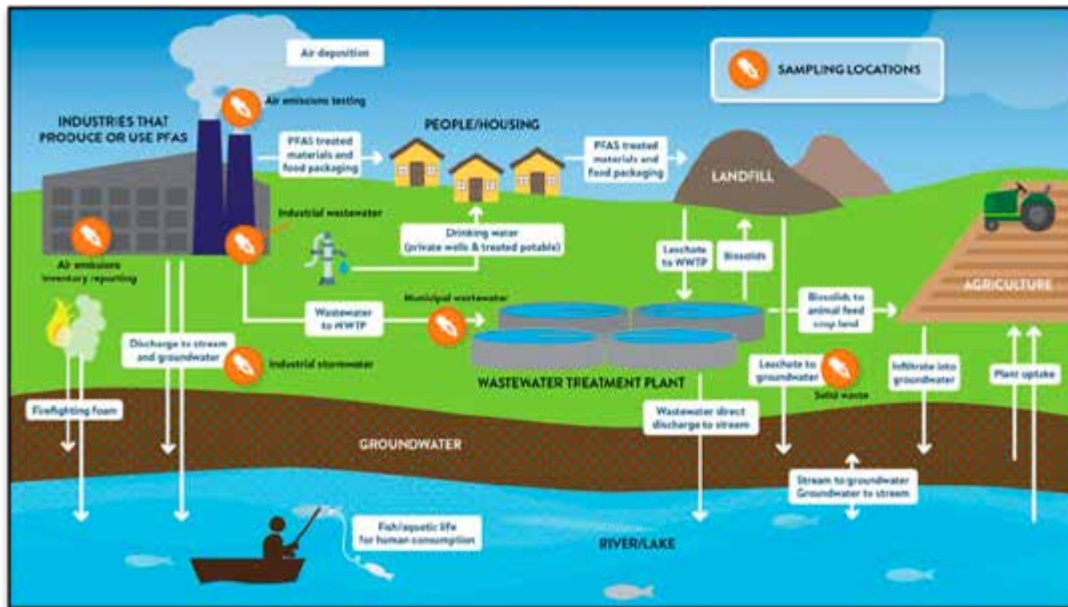
²⁶ “Risk Management for Per- and Polyfluoroalkyl Substances (PFAS) under TSCA,” EPA, accessed May 21, 2026, <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-management-and-polyfluoroalkyl-substances-pfas>.

²⁷ “Understanding the PFAS Cycle,” EcoPulse, accessed April 13, 2026, <https://www.ecopulsenow.com/insights/understanding-the-pfas-cycle>.

into the environment. PFAS are absorbed from the environment by plants and animals, and then move up the food chain.

Human exposure. Most people are exposed to PFAS through using PFAS-contaminated products, drinking contaminated water, and eating contaminated food such as fish caught from water contaminated by PFAS, and dairy products from livestock exposed to PFAS.²⁸ The US Centers for Disease Control (CDC) National Health and Nutrition Examination Survey (NHANES) estimated that in NHANES 2017–2018 data 98% of the US population had combined PFAS serum levels greater than 2 nanograms per milliliter.²⁹

Re-entry. Even after disposal of PFAS products, PFAS can re-enter the environment through landfill leachate or runoff to soils, agricultural spreading of biosolids, and municipal wastewater treatment effluent discharges to surface water, resulting in PFAS cycling back into soil, animal feed crops, and water.



Source: Minnesota Pollution Control Agency

Figure 5 - The PFAS Cycle

What is the Source of PFAS in Orange County Groundwater?

Wastewater treatment plants located along the Santa Ana River that discharge effluent to the Santa Ana River upstream of managed aquifer recharge operations are sources

²⁸ "Risk Management for Per- and Polyfluoroalkyl Substances (PFAS) under TSCA," EPA.

²⁹ "National Health and Nutrition Examination Survey. NHANES 2017-18 Overview," Centers for Disease Control and Prevention (CDC), accessed April 16, 2026, <https://wwwn.cdc.gov/nchs/nhanes/continuousnhanes/default.aspx?BeginYear=2017>.

of PFAS contamination for public water systems downstream of these wastewater treatment plants.³⁰ The OCWD Groundwater Replenishment System (GWRS) actively manages and recharges the Orange County groundwater basin with surface water from the Santa Ana River, imported surface water, and purified recycled water from the GWRS. For much of the year, flow in the Santa Ana River consists predominantly of effluent from municipal wastewater treatment plants upstream from the Orange County groundwater basin.³¹ Figure 6 illustrates these upstream wastewater discharges to the Santa Ana River.³² PFAS has recently been measured in the Santa Ana River at concentrations consistent with wells surrounding the recharge facilities, suggesting that historic concentrations of PFAS in the Santa Ana River may be a primary input of PFAS in the Orange County groundwater basin.³³

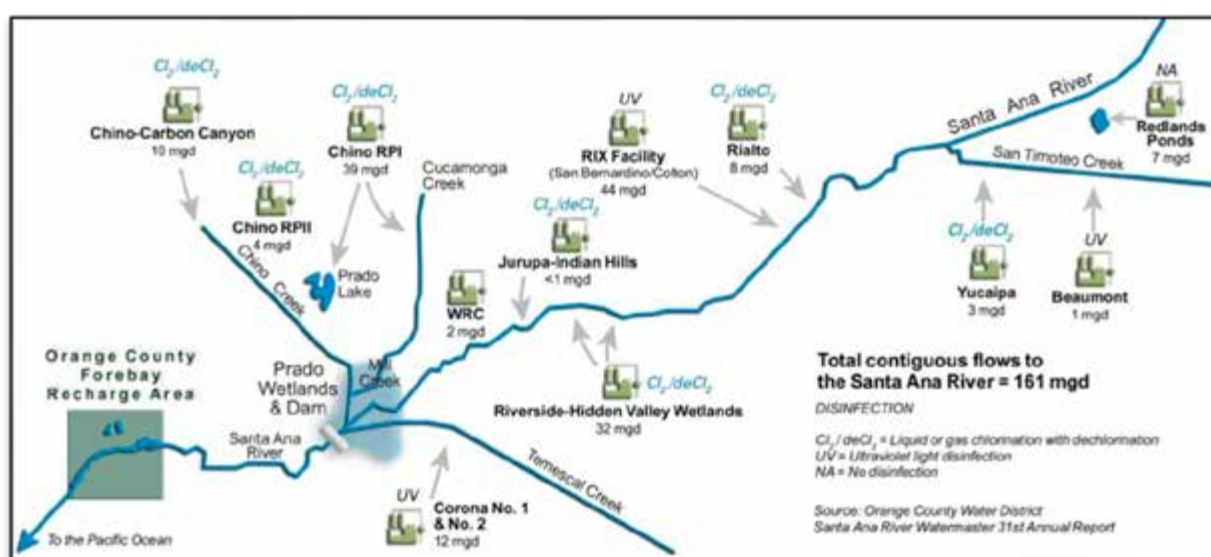


Figure 6 - Wastewater Treatment Discharges to the Santa Ana River

5

How Much PFAS is Found in the General Population?

Because of their widespread use and their persistence in the environment, many PFAS are found in the blood of people and animals all over the world.³⁴ CDC scientists have measured PFAS in the blood serum (the clear portion of blood) of 98% of participants

³⁰ "Per- and Polyfluoroalkyl Substances (PFAS), What are PFAS?" SWRCB, accessed May 21, 2026, https://www.waterboards.ca.gov/santaana/water_issues/programs/pfas/.

³¹ "UCI PFAS Health Study," University of California, Irvine, accessed May 12, 2026, <https://sites.uci.edu/pfas/>.

³² National Water Research Institute, *Report of the Scientific Advisory Panel: Orange County Water District's Santa Ana River Water Quality and Health Study*, Fountain Valley, CA, 2004, accessed April 14, 2026, <https://www.ocwd.com/wp-content/uploads/sarwqh-final-nwri-panel-report-2004.pdf>.

³³ Russ Detwiler, *Reconstructing historical PFAS concentrations in groundwater using a reduced-order modeling framework*. Albuquerque NM, InterPore2025, May 20, 2025, accessed April 16, 2026, <https://events.interpore.org/event/56/contributions/7590/>.

³⁴ "PFAS Explained," EPA.

aged 12 years and older since 1999, indicating widespread exposure to PFAS in the US population.³⁵

Researchers at the University of California, Irvine (UCI) are participating in the CDC Multi-site Study (MSS).³⁶ The MSS provides information to communities about the health effects of exposure to PFAS. The UCI MSS site is the area in Orange County, shown at [On the chart, the Orange County study site is labeled “CA.” Orange County is the only California location included in the study.](#)

Figure 7.



Source: CDC

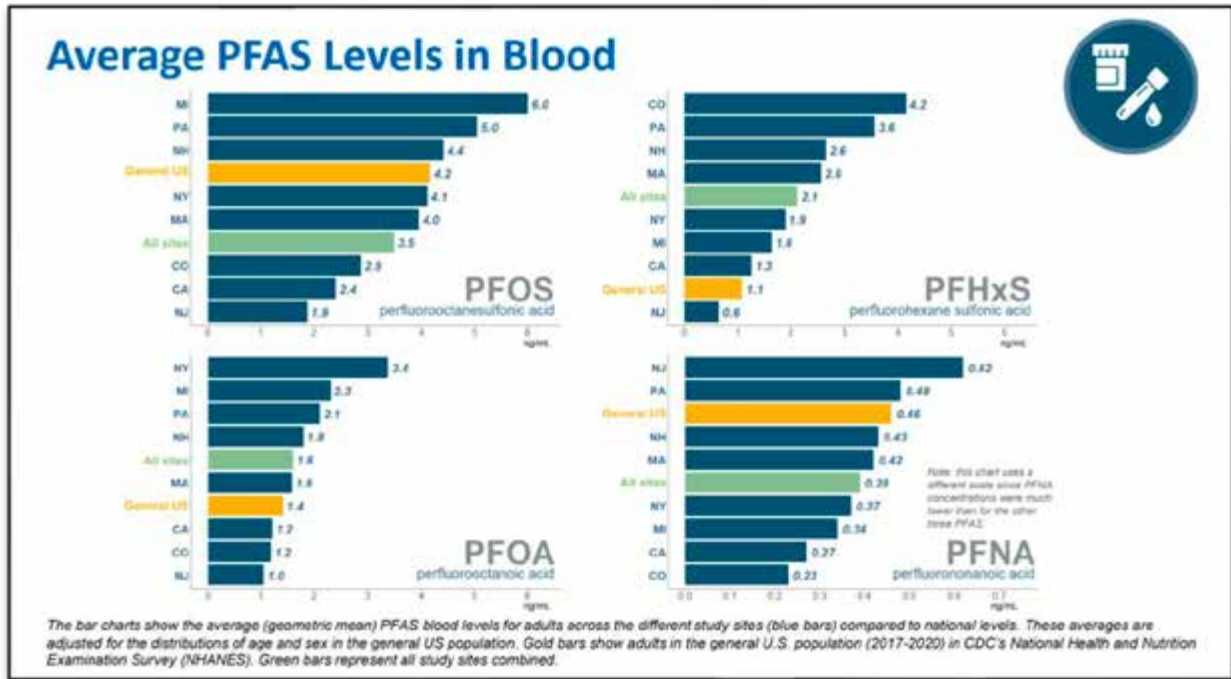
Figure 7 - CDC Multi-site Study Site Orange County, CA

At the July 2025 MSS update, the UCI researchers shared results showing average levels of certain PFAS chemicals in the blood of adults who participated at the Orange County study site. They compared Orange County results with other study locations and with national averages. For adults at the Orange County site, the average blood levels were estimated to be 2.4 for PFOS, 1.2 for PFOA, 1.3 for PFHxS, and 0.27 for PFNA (measured in nanograms per milliliter, ng/L) These levels were lower than the averages seen across all study sites. In addition, all of these levels, except PFHxS, were lower than the average levels found in the general U.S. population. See Figure 8 for the UCI MSS chart of

³⁵ “PFAS Frequently Asked Questions,” SWRCB, 5, [8] CDC, “National Report on Human Exposure to Environmental Chemicals,” 2019, accessed April 23, 2026, https://www.waterboards.ca.gov/pfas/docs/master_pfas_faq_mar.pdf.

³⁶ “Multi-site Study,” CDC, Agency for Toxic Substances and Disease Registry (ATSDR), Per- and Polyfluoroalkyl Substances (PFAS) and Your Health, accessed April 16, 2026, <https://www.atsdr.cdc.gov/pfas/health-studies/multi-site-study.html>.

Average PFAS Levels in Blood.³⁷ On the chart, the Orange County study site is labeled “CA.” Orange County is the only California location included in the study.



Source: CDC

Figure 8 - Average PFAS Levels in Blood, CDC Multi-site Study Virtual Open House, July 2025

Because of the phasing out of certain PFAS compounds, serum levels of PFOA and PFOS in the general population of the US have decreased dramatically in recent years. According to the CDC, blood levels of both PFOS and PFOA have steadily decreased in US residents since 1999-2000.³⁸

5

The half-life of PFAS in the human body is defined as the time required for the PFAS concentrations in serum or plasma to fall by half from the starting concentration.³⁹ Thirteen studies conducted mainly in Europe and the US involving both general populations and exposed workers resulted in half-life estimates for PFOA of 2.73 years (range: 1.48 to 5.1 years), 4.70 years for PFOS (range: 1.69 to 5.7 years), and 5.31 years for PFHxS (range: 2.84 to 8.5 years).⁴⁰ Based on that information, with no

³⁷ “PFAS Multi-site Study (MSS), Virtual Open House,” CDC, ATSDR, July 28, 2025, accessed April 16, 2026, <https://www.atsdr.cdc.gov/media/pdfs/2025/08/Open-House-Slides-508.pdf>.

³⁸ “Per- and Polyfluoroalkyl Substances (PFAS) and Your Health, Fast Facts: PFAS in the U.S. Population,” CDC, ATSDR, <https://www.atsdr.cdc.gov/pfas/data-research/facts-stats/index.html>.

³⁹ Isabella Rosato, et al. “Estimation of per- and polyfluoroalkyl substances (PFAS) half-lives in human studies: a systematic review and meta-analysis,” *Environmental Research*, Volume 242, February 1, 2024, 117743, accessed April 13, 2026, <https://www.sciencedirect.com/science/article/pii/S0013935123025471>.

⁴⁰ Isabella Rosato, et al. “Estimation of per- and polyfluoroalkyl substances (PFAS) half-lives.”

additional exposure, it could be anticipated that PFAS may be cleared from the body after an average of five years. However, PFAS exposures continue in general populations primarily through food and water despite production phase outs and regulatory interventions.

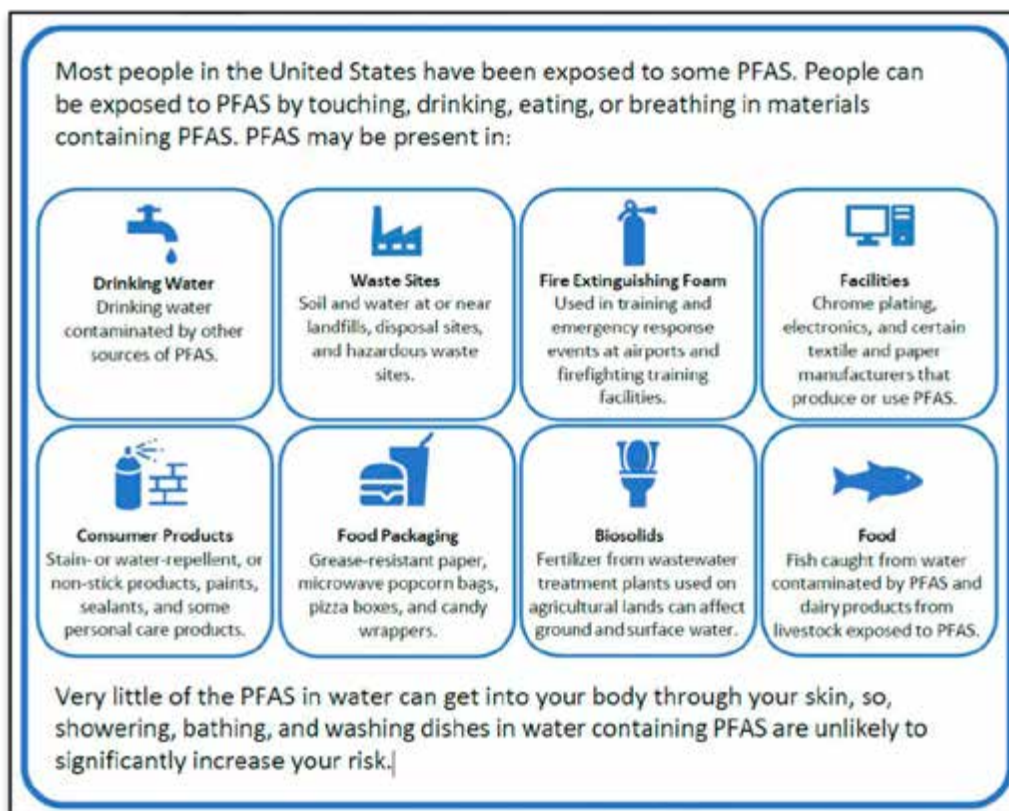
How Are People Exposed to PFAS?

There is general agreement that dietary intake is the largest source of PFAS exposure rather than inhalation or dermal contact.⁴¹ Direct exposures due to use in products can be quickly phased out by production phaseouts but exposures driven by PFAS accumulation in the environment, food chains, and contamination of groundwater and drinking water persist because of the continuing PFAS cycle. Human exposures to PFOS and PFOA, the two PFAS that are of greatest regulatory concern, have been declining due to regulatory interventions while understanding of their adverse effects on human health has been rapidly advancing. At the same time, a proliferation of new PFASs has rapidly replaced PFOS and PFOA with shorter chain length PFASs and new chemicals that are difficult to detect using standard methods.⁴² Emerging evidence from animal experiments suggests some of these alternative PFASs can be equally hazardous.⁴³

⁴¹ Sunderland, "A review of the pathways of human exposure," 136.

⁴² Sunderland, "A review of the pathways of human exposure," 132.

⁴³ Ibid.



Source: EPA

Figure 9 - How are people exposed to PFAS?⁴⁴

PFAS Exposure and Excretion

Exposure happens when a person breathes, eats, drinks, or touches a chemical and it enters their body. Excretion is the process whereby substances, like PFAS, leave the body. All PFAS can leave the body over time through urine, through menstrual blood or blood donation, or through breast milk. All of these factors could affect PFAS levels measured in blood.⁴⁵ While PFAS blood test results can tell you the amount of certain PFAS in your blood, the test results will not provide information to pinpoint a health problem and will not predict future health outcomes. You can talk with your healthcare provider about the benefits and limitations of PFAS blood testing.⁴⁶

⁴⁴ "PFAS Explained," EPA, 2, March 11, 2026, <https://www.epa.gov/system/files/documents/2023-10/final-virtual-pfas-explainer-508.pdf>.

⁴⁵ "Per- and Polyfluoralkyl Substances (PFAS) and Your Health, Preventing PFAS Exposure," CDC, ATSDR, accessed April 16, 2026, <https://www.atsdr.cdc.gov/pfas/prevent-exposure/your-body.html>.

⁴⁶ "Per- and Polyfluoralkyl Substances (PFAS) and Your Health, Testing for PFAS," CDC, ATSDR, accessed April 17, 2026, <https://www.atsdr.cdc.gov/pfas/blood-testing/index.html>.

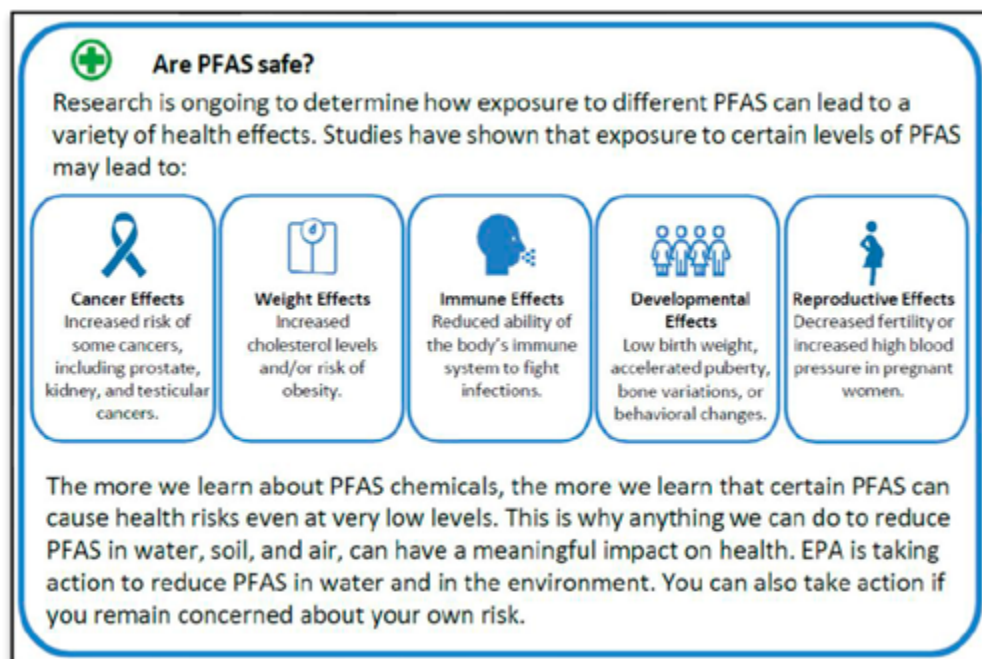
What are the Health Effects of Exposure?

Exposure to unsafe levels of PFOA/PFOS may result in adverse health effects including developmental effects to fetuses during pregnancy, cancer, liver effects, immune effects, thyroid effects, and other effects such as cholesterol changes.⁴⁷

Laboratory studies in animals who were exposed to PFAS found links between the chemicals and increased cholesterol, changes in the body's hormones, alterations of the immunologic system, decreased fertility, increased risk of cancer (especially kidney and testicular), low birth weight, delayed puberty onset, and birth defects. Since humans and animals react differently to PFAS, not all effects observed in animals may occur in humans. Although many epidemiology studies have examined the potential of PFAS to result in adverse health effects, most of the studies are cross-sectional in design and do not establish causality. Based on several factors outlined in the report of PFAS by the CDC including the consistency of findings across studies, the available epidemiology studies suggest associations between PFAS exposure and several health outcomes in humans.⁴⁸

⁴⁷ "PFAS Frequently Asked Questions," SWRCB, 5, [6] A. M. Calafat, L.-Y. Wong, Z. Kuklennyik, J. A. Reidy, and L. L. Needham, "Polyfluoroalkyl Chemicals in the US Population: Data from the National Health and Nutrition Examination Survey (NHANES) 2003–2004 and Comparisons with NHANES 1999–2000," *Environ. Health Perspect.*, vol. 115, no. 11, pp. 1596 - 1602, Nov. 2007, https://www.waterboards.ca.gov/pfas/docs/master_pfas_faq_mar.pdf.

⁴⁸ "PFAS Frequently Asked Questions," SWRCB, 8, [1] ATSDR, "Toxicological Profile for Perfluoroalkyls, Draft for Public Comment," 2018, https://www.waterboards.ca.gov/pfas/docs/master_pfas_faq_mar.pdf.



Source: EPA

Figure 10 - Are PFAS Safe?⁴⁹

PFAS Regulatory Requirements

Public drinking water systems are required to follow certain regulations to ensure that the water they serve to their customers is safe to drink.⁵⁰

In recent years, specific regulations have been issued to address PFAS contamination that require monitoring and taking actions when PFAS is detected in drinking water sources. The following sections present PFAS regulations in the order they were issued by the EPA and California State Water Resources Control Board (SWRCB).

PFAS Monitoring Requirements

Monitoring refers to the collection and evaluation of data for contaminants that are suspected of being present in water. Samples are collected and analyzed according to EPA-approved laboratory methods. Monitoring results are reported to either the EPA or SWRCB. This data serves as a primary source of occurrence and exposure information used to develop regulatory decisions.

OCWD conducts all sampling and analyses and reporting of monitoring results to regulatory agencies on behalf of its member agencies. OCWD owns and operates its

⁴⁹ "PFAS Explained," EPA, 1, accessed March 11, 2026, <https://www.epa.gov/system/files/documents/2023-10/final-virtual-pfas-explainer-508.pdf>.

⁵⁰ "Drinking Water Standards and Regulations: An Overview," CDC, accessed May 21, 2026, <https://www.cdc.gov/drinking-water/about/drinking-water-standards-and-regulations-an-overview.html>.

own EPA-certified laboratory where it can use analytical methods approved by the EPA. MWDOC member agencies conduct monitoring activities using either their own staff or contractors to collect samples, which are delivered to EPA-certified laboratories for analyses. Laboratories report the results of their analyses to each MWDOC water retailer, who then reports the results to either the EPA or SWRCB.

EPA Unregulated Contaminant Monitoring Rule

EPA uses the Unregulated Contaminant Monitoring Rule (UCMR) to collect data every five years for no more than 30 priority contaminants that are suspected to be present in drinking water and do not have health-based standards set under the Safe Drinking Water Act (SDWA).⁵¹ The UCMR applies to all large public water systems (PWSs) serving greater than 10,000 people, all small PWSs serving between 3,300 and 10,000 people, and a representative sample of small PWSs serving fewer than 3,300 people.

EPA establishes the list of contaminants for each five-year UCMR cycle, considering an initial list of contaminants that are not regulated by the National Primary Drinking Water Regulations, are known or anticipated to occur at PWSs, and may warrant regulation under the SDWA.⁵²

The SDWA Public Notification Rule ensures that consumers will receive notice if there is a risk to public health from their drinking water. The Public Notification Rule requires that all PWSs notify their customers of the availability of UCMR results no later than 12-months after results are known. CWS are required to report UCMR results in their Consumer Confidence Report (CCR) when unregulated contaminants are detected. The annual drinking water quality report must include notice of availability of unregulated contaminant monitoring results, the average of the year's results and the range of detections.⁵³

The Grand Jury obtained UCMR monitoring data for all sampling and analyses conducted to fulfill UCMR requirements for its member agencies. The highest PFAS detections for all OCWD sources during the UCMR 3 and UCMR 5 monitoring cycles are shown at Figure 11.

⁵¹ "Summary of the Safe Drinking Water Act," EPA.

⁵² "Learn About the Unregulated Contaminant Monitoring Rule," EPA, accessed April 7, 2026, <https://www.epa.gov/dwucmr/learn-about-unregulated-contaminant-monitoring-rule>.

⁵³ "Public Notification Rule," EPA, accessed April 7, 2026, <https://www.epa.gov/dwreginfo/public-notification-rule#rule-summary>.

EPA UCMR	Number of PFAS on UCMR Contaminants List	Maximum PFAS Detection Among all OCWD Sources
2012-2016 UCMR 3	6 PFAS Figure 20, Appendix A	70 ng/L
2022-2026 UCMR 5	29 PFAS Figure 21, Appendix A	29 ng/L

Source: Compiled from OCWD data

Figure 11 - Highest PFAS Detections Among All OCWD Sources During UCMR 3 and UCMR 5 Monitoring Cycles

California State Water Resources Control Board PFAS General Monitoring Orders

Beginning in 2020, the SWRCB Division of Drinking Water, based on review of monitoring results from its 2019 PFAS monitoring orders, determined that it was necessary to expand monitoring to groundwater sources located within the vicinity of the PFAS detections. Several PFAS general monitoring orders were issued to PWSs 2020, 2021, 2022, and 2025 that included Orange County groundwater well locations.⁵⁴

Each of the SWRCB PFAS monitoring orders included requirements for sample collection and laboratory analysis by specific dates, to be followed by monitoring conducted every calendar quarter thereafter.⁵⁵ These PFAS monitoring orders established Consumer Confidence Report Detection Levels (CCRD), and Notification and Response Levels for each PFAS chemical to be monitored. A list of the SWRCB PFAS monitoring orders and exhibits identifying groundwater sources required to be monitored are shown at Appendix A, as well as copies of the CCRDL for each monitoring order.

The Grand Jury obtained monitoring data for all sampling and analyses conducted to fulfill SWRCB monitoring order requirements for sources listed in the monitoring orders that are owned by their member agencies. The highest PFAS detections for all these OCWD sources are shown at Figure 12.

⁵⁴ "PFAS DDW General Orders," SWRCB, accessed May 21, 2026, https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas_ddw_general_order/.

⁵⁵ Ibid.

SWRCB Order	Number of PFAS on Order CCRDL	Selected Monitoring Date Range	Maximum PFAS Detection Among All OCWD Sources Listed on Order Exhibit A
2020-0003-DDW	18 PFAS Figure 23, Appendix A	8/27/20 - 2/15/21	67.5 ng/L
2021-0003-DDW	18 PFAS Figure 24, Appendix A	2/16/21 - 10/30/22	470 ng/L ²
2022-0001-DDW	25 PFAS Figure 25, Appendix A	10/31/22 - 4/24/24	169 ng/L ³
2025-0002-DDW	25 PFAS Figure 26, Appendix A	4/25/24 - 3/19/26 ¹	73.7 ng/L

¹OCWD monitoring data as of March 19, 2026
²Outlier result. Next maximum PFAS result 88 ng/L
³Outlier result. Next maximum PFAS result 73.7 ng/L

Source: Compiled from OCWD data

Figure 12 - Highest PFAS Detections Among All OCWD Sources Listed on Each SWRCB Monitoring Order Exhibit A

2025 SWRCB General Order DW 2025-0002-DDW

The 2025 SWRCB General Order, issued on December 12, 2025, adopted the initial monitoring requirements in the federal PFAS Rule for each California CWS and non-transient, non-community water system. The 2025 SWRCB Order allows previously acquired data to count toward initial monitoring if collected on or after January 1, 2019, and reported concentrations no greater than the respective MCL.⁵⁶

The 2025 SWRCB General Order also included a list of Orange County groundwater sources showing that 151 of the 198 listed sources had completed initial monitoring as required by the federal PFAS Rule.⁵⁷

PFAS Notification and Response Requirements

Notification and response levels are health-based advisory levels established by the SWRCB Division of Drinking Water (DDW) for chemicals in drinking water that do not have established MCLs.

When chemicals are found in drinking water at concentrations greater than their notification levels, PWSs are required by law to make specific notifications. When

⁵⁶ "ORDER DW 2025-0002-DDW," SWRCB, accessed May 21, 2026, https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas_ddw_general_order/docs/order-dw-2025-0002-ddw-pfas-initial-monitoring.pdf.

⁵⁷ "Exhibit A – List of Sources and Required Monitoring Frequency," SWRCB, accessed May 21, 2026, https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.waterboards.ca.gov%2Fdrinking_water%2Fcertlic%2Fdrinkingwater%2Fpfas_ddw_general_order%2Fdocs%2Forder-dw-2025-0002-ddw-exhibit-a.xlsx&wdOrigin=BROWSELINK.

chemicals are found in drinking water at concentrations greater than their response levels, DDW recommends removal of a drinking water source from service.⁵⁸

PFAS notification and response levels specified in CCRDLs attached to SWRCB general monitoring orders remain in effect until MCLs are established and become effective. For example, MCLs for specific PFAS will become effective in 2029, and at that time will supersede notification and response levels specified the 2022 CCRDL.

PFAS National Primary Drinking Water Regulation

In April 2024 EPA announced the final National Primary Drinking Water Regulation for six PFAS (the federal PFAS Rule).⁵⁹ The PFAS Rule applies to all CWS. The EPA expects that over many years this rule will prevent PFAS exposure in drinking for approximately 100 million people, prevent thousands of deaths, and reduce tens of thousands of serious PFAS-attributable illnesses.⁶⁰

The PFAS Rule establishes initial monitoring and compliance monitoring requirements, and enforceable maximum contaminant levels (MCL) for six PFAS in drinking water. Initial monitoring for six listed PFAS must be implemented beginning April 2024 and must be completed no later than April 26, 2027. Compliance monitoring requirements beginning April 26, 2027, will be either triennial, annual, or quarterly as determined by the SWRCB based on results of the initial monitoring.

Maximum Contaminant Level (MCL) is the highest level of a contaminant allowed in drinking water. EPA has established legally enforceable MCLs of 4.0 parts per trillion (ppt) for PFOA and PFOS, and 10.0 ppt for PFHxS, PFNA, and HFPO-DA (GenX chemicals). Figure 13 shows the MCLs and MCLG effective April 26, 2029.

Ensuring compliance with drinking water MCLs for the PFAS of most concern is the reason over \$600 million (see Figure 17) is being spent to construct PFAS treatment facilities in Orange County.

⁵⁸ "Drinking Water Notification Levels," SWRCB, accessed May 21, 2026,

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/NotificationLevels.html.

⁵⁹ "Per- and Polyfluoroalkyl Substances (PFAS), Final PFAS National Primary Drinking Water Regulation," EPA, accessed May 21, 2026, <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>.

⁶⁰ Ibid.

Chemical	Maximum Contaminant Level Goal (MCLG)	Maximum Contaminant Level (MCL)
PFOA	0	4.0 ppt
PFOS	0	4.0 ppt
PFNA	10 ppt	10 ppt
PFHxS	10 ppt	10 ppt
HFPO-DA (GenX chemicals)	10 ppt	10 ppt
Mixture of two or more: PFNA, PFHxS, HFPO-DA, and PFBS	Hazard Index of 1	Hazard Index of 1
Maximum Contaminant Level Goal (MCLG): The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety and are non-enforceable public health goals. Maximum Contaminant Level (MCL): The highest level of a contaminant that is allowed in drinking water. MCLs are set as close to MCLGs as feasible using the best available treatment technology and taking cost into consideration. MCLs are enforceable standards. ppt: parts per trillion Hazard Index (HI): The Hazard Index is a long-established approach that EPA regularly uses to understand health risk from a chemical mixture (i.e., exposure to multiple chemicals). The HI is made up of a sum of fractions. Each fraction compares the level of each PFAS measured in the water to the health-based water concentration.		

Source: EPA

Figure 13 - PFAS Rule Enforceable Maximum Contaminant Levels and Maximum Contaminant Level Goals⁶¹

In addition to ongoing compliance monitoring and MCLs, the PFAS Rule also includes additional requirements with future effective dates. Between April 2027 and April 2029, if monitoring shows that drinking water levels exceed MCLs, CWS must implement solutions that reduce these PFAS; results of initial monitoring must be included in the CCR; results of compliance monitoring must be included in the CCR; and public notification is required for monitoring and testing violations. Starting April 2029, CWS that have MCL violations must take action to reduce levels of these PFAS in their drinking water, and public notification is required for MCL violations.

Compliance with Regulatory Requirements

Consumer Confidence Reports

The Grand Jury reviewed the 2025 Consumer Confidence Reports (Water Quality Reports) issued by 31 water retailers serving Orange County. The CCR is to be delivered to all billing customers by July 1 of each year and must include specified information. All 31 water retailers complied with the eight content requirements specified by the EPA, shown in Appendix B.⁶² Seven of the 11 water retailers operating PFAS

⁶¹ "PFAS National Primary Drinking Water Regulation, April 2024," EPA, accessed May 12, 2026, https://www.epa.gov/system/files/documents/2024-04/pfas-npdwr_fact-sheet_general_4.9.24v1.pdf.

⁶² "Consumer Confidence Report Rule: A Quick Reference Guide," EPA, accessed April 18, 2026, https://www.epa.gov/sites/default/files/2014-05/documents/guide_qrg_ccr_2011.pdf.

treatment facilities in Orange County included a PFAS advisory section in their CCRs, while only 55 percent of the 31 water retailers included any PFAS advisory statement.

The Grand Jury found that the 31 Orange County water retailers reported either “not detected” results or concentrations below notification thresholds for the six PFAS listed in the EPA PFAS Rule on their 2025 CCRs. After PFAS treatment facilities became operational, OCWD member retailers operating these facilities consistently reported “not detected” results for the same six PFAS. The Grand Jury found that PFAS results from individual wells do not necessarily reflect the quality of water delivered to customers, as some tested wells were later placed into inactive status or destroyed. CCRs documented PFAS constituents exceeding notification levels as required and did not report “not detected” results for those constituents. Monitoring results and CCRs are available in the Safe Drinking Water Information System (SDWIS), California’s official database for tracking public water systems, drinking water quality monitoring, regulatory compliance, and enforcement.⁶³

Notification and Response

As of 2020, drinking water retailers with PFAS detections above notification and response levels at wells without PFAS treatment facilities began to rely on imported water, or groundwater blended with imported water to deliver drinking water with PFAS concentrations below notification and response levels. As of 2021, multiple water retailers in Orange County shut down groundwater wells after PFAS concentrations at those wells exceeded established response levels.⁶⁴

PFAS Rule Initial Monitoring

When the 2025 SWRCB General Order adopting the PFAS National Primary Drinking Water Regulation was issued in December 2025, 76% of listed Orange County groundwater sources had already completed initial monitoring required to be completed by April 2027. Most of the remaining Orange County sources received credit for previously acquired data, leaving only 6% with all requirements to be completed by April 2027.

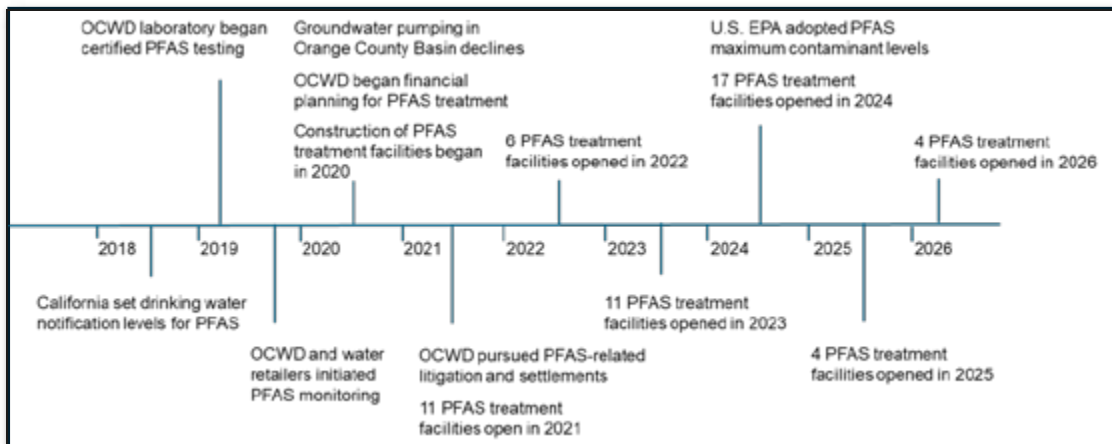
⁶³ “Drinking Water Watch,” SWRCB, Division of Drinking Water, Safe Drinking Water Information System (SDWIS), accessed April 26, 2026, <https://sdwis.waterboards.ca.gov/PDWW/>.

⁶⁴ “Orange County launches first water plant to remove PFAS toxins,” Solano Public Health, accessed April 29, 2026, <https://publichealth.networkofcare.org/solano/CommunityResources/News/Article?articleId=124536>.

Proactive Response to PFAS Impacts

PFAS Impacts and OCWD Response

OCWD coordinated a regional response to PFAS contamination in partnership with its member agencies. These efforts focus on restoring the groundwater basin, which supplies up to 85 percent of the water used by approximately 2.5 million residents in north and central Orange County. A timeline of OCWD response to PFAS in the Orange County Groundwater Basin is shown in Figure 14. As PFAS-impacted groundwater wells began to be shut down in early 2020, public education became a critical component of community water systems' response. OCWD dedicated resources to public outreach, including the development of informational web pages to inform the public about PFAS impacts and the measures being implemented to address them.⁶⁵



Source: Compiled from multiple OCWD sources

Figure 14 - Timeline of OCWD Response to PFAS in the Santa Ana River Basin

PFAS contamination has impacted more than 100 groundwater wells across 15 water retailers. As of this report, 53 wells have returned to service following construction of treatment facilities. Figure 15 [Figure 15 - Map of Current and Future PFAS Treatment](#) shows a map of current and future PFAS treatment locations in Orange County.

⁶⁵ "PFAS education center," Orange County Water District, accessed April 8, 2026, <https://www.ocwd.com/what-we-do/water-quality/pfas/>.

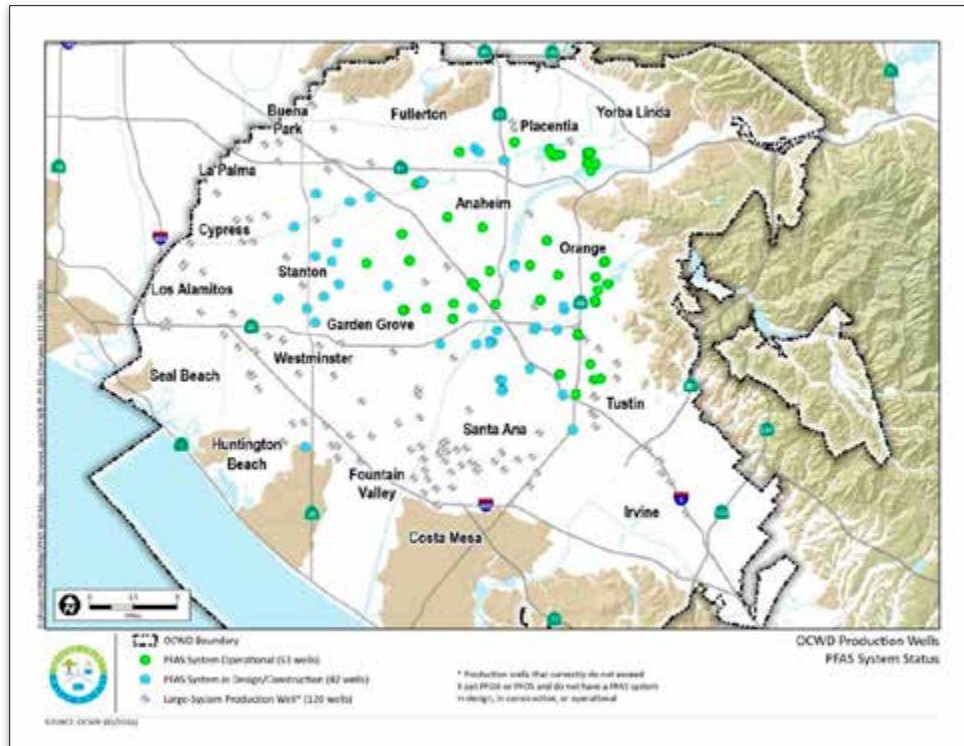
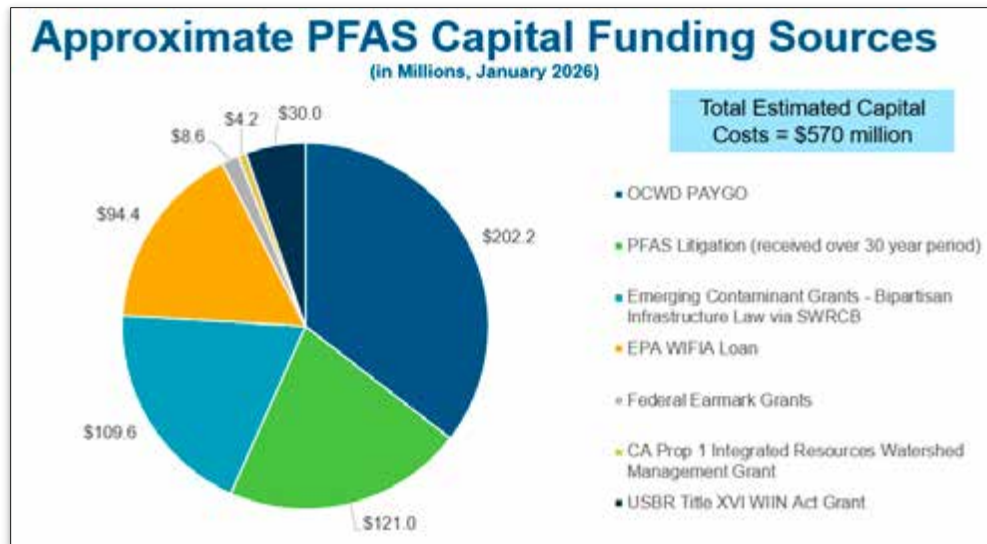


Figure 15 - Map of Current and Future PFAS Treatment Locations

PFAS Treatment Facilities and Capital Costs

Construction of PFAS treatment facilities began in 2020. OCWD executed the PFAS Treatment Facilities and Program Agreement, under which OCWD funds capital costs and shares operating and maintenance (O&M) costs with participating water retailers.

Figure 16 summarizes projected PFAS capital funding sources as of January 2026, including OCWD pay-as-you-go (PAYGO) revenue, state and federal grants, an EPA Water Infrastructure Finance and Innovation Act (WIFIA) loan, and litigation settlement proceeds. The Grand Jury commends OCWD for securing diversified funding sources to advance timely treatment facility construction.



Source: OCWD data

Figure 16 - Approximate PFAS Capital Funding Sources

[Figure 17 - Summary of PFAS Treatment Facilities](#) summarizes PFAS treatment facilities by water retailer, opening date, treatment technology, capacity, location, connections, number of wells, and capital costs. Facilities began entering service in mid-2021, starting with a treatment plant in Fullerton, with additional facilities becoming operational over time. Most facilities use ion exchange technology. Capital costs vary based on the number of affected wells, conveyance pipeline requirements, and treatment facility configuration.

OCWD is funding the reasonable costs of designing and constructing PFAS treatment facilities for its member water retailers. Each retailer could either have OCWD design and build the treatment facility or receive reimbursement for designing and constructing the treatment system independently. As of this report, 38 wells with PFAS treatment were built by OCWD and fifteen wells with PFAS treatment were designed and built by the water retailers.

Eighteen wells with PFAS treatment construction projects by OCWD have been completed on schedule. Ten wells with PFAS treatment projects, which were built by OCWD, were completed on schedule; however, OCWD experienced cost overruns due to specialized design requirements or owner-requested improvements. An additional 10 wells with PFAS treatment projects that were done by OCWD were completed late and over budget, primarily due to pandemic-related material delays, design complexity, owner-requested improvements, and utility coordination challenges.

Community Water System	Opening Date	Type	Capacity	Location	Connections	Wells	Total Cost (\$M)	Actual-to Date (\$M)	Remaining Budget (\$M)
City of Anaheim	Sep-2024	Ion Exchange	51,000 gal/min	Nine (9) PFAS treatment facilities at Linda Vista, Katella Ave., Santa Cruz, Energy Field, Brookhurst, Willow Park, Downtown, Boysen Park, and La Palma	64,000	14	\$117.1	\$117.1	\$0.0
	Dec-2028	Ion Exchange	8,000 gal/min	Wells 48 & 53		2	\$16.0	\$0.8	\$15.3
	Dec-2028	Ion Exchange	8,000 gal/min	Wells 39 & 47		2	\$16.0	\$0.9	\$15.1
	Dec-2029	Ion Exchange	TBD	Well 51		1	\$7.0	\$0.0	\$7.0
City of Buena Park	Jun-2026	Packer	2,200 gal/min	Linden Well - Install Packer to reduce flow from PFAS zone(s) in the well - not treatment.		1	\$0.6	\$0.1	\$0.6
City of Fullerton	Jun-2021	Ion Exchange	2,400 gal/min	Kimberly Well 1A	32,000	1	\$5.3	\$4.1	\$1.3
	Dec-2023	Granular Activated Carbon (GAC)	5,000 gal/min	Main Plant 3A		1	\$13.7	\$13.7	\$0.0
	Dec-2026	Granular Activated Carbon (GAC)	4,000 gal/min	Main Plant Wells 5,6,7,8		4	\$12.5	\$2.6	\$9.9
	Jun-2027	Ion Exchange	4,400 gal/min	Kimberly Well 2		1	\$10.9	\$4.3	\$6.6
	Dec-2029	Ion Exchange	1,600 gal/min	Sunclipse Well 10 - Pipeline for Treatment at Kimberly 2 Plant Well 15 - New Well Site Needed		2	\$15.3	\$0.0	\$15.3
City of Garden Grove	Jun-2023	Ion Exchange	17,600 gal/min	Wells 21, 23, 28, 29, 30, 31	34,300	6	\$24.3	\$24.3	\$0.0
	Dec-2026	Ion Exchange	2,000 gal/min	Well 19		1	\$6.5	\$1.9	\$4.7
	Dec-2028	Ion Exchange	13,590 gal/min	Wells 22, 26, and 27		3	\$31.7	\$1.6	\$30.2
	Dec-2030	Ion Exchange	2,000 gal/min	Well 25		1	\$7.0	\$0.0	\$7.0
City of Huntington Beach	Dec-2029	Ion Exchange	3,000 gal/min	Well 3A		1	\$8.0	\$0.0	\$8.0
	Dec-2030	Ion Exchange	3,000 gal/min	Well 6		1	\$8.0	\$0.0	\$8.0
City of Orange	Sep-2022	Ion Exchange	8,420 gal/min	Wells 9, 19, 23, 24	36,000	4	\$10.0	\$9.9	\$0.1
	Apr-2026	Ion Exchange	7,940 gal/min	Wells 20, 21, 22		3	\$14.7	\$14.7	\$0.0
	Apr-2026	Ion Exchange	3,200 gal/min	Well 28		1	\$5.0	\$4.0	\$1.0
	Dec-2028	Ion Exchange	5,500 gal/min	Wells 25, 27		2	\$13.0	\$0.4	\$12.7
	Dec-2029	Ion Exchange	3,200 gal/min	Well 26		1	\$7.0	\$0.1	\$6.9
	Dec-2029	Ion Exchange	TBD	Well 29 - New Well Currently Being Drilled by City		1	\$6.0	\$1.0	\$5.0
City of Santa Ana	May-2023	Ion Exchange	2,500 gal/min	Well 40	45,576	1	\$5.8	\$5.8	\$0.0
	Sep-2026	Ion Exchange	2,500 gal/min	Well 38		1	\$7.4	\$7.4	\$0.0
	Dec-2026	Ion Exchange	2,000 gal/min	Well 31		1	\$8.5	\$6.8	\$1.7
	Apr-2027	Ion Exchange	3,600 gal/min	Well 27&28		2	\$17.0	\$8.7	\$8.3
	May-2027	Ion Exchange	9,200 gal/min	Wells 27, 28, 31, 38, 40 at John Garthe Reservoir		5	\$31.4	\$0.0	\$31.4
	Dec-2029	Ion Exchange	12,400 gal/min	Wells 16, 29, 33, 41, 43(fut) at Walnut Reservoir		5	\$25.0	\$0.1	\$24.9
City of Tustin	May-2025	Ion Exchange	6,400 gal/min	Main Street and Prospect Avenue to remove PFAS from four (4) wells in Tustin	14,500	4	\$32.7	\$32.7	\$0.0
	Dec-2029	Ion Exchange	2,000 gal/min	Edinger Well		1	\$7.0	\$0.0	\$7.0
	Dec-2030	Ion Exchange	2,300 gal/min	17th St Wells (2 wells treated)		2	\$7.0	\$0.0	\$7.0
City of Westminster	Dec-2030	Ion Exchange	2,500 gal/min	WM-3 (New Well)		1	\$8.0	\$0.0	\$8.0
	Dec-2030	Ion Exchange	2,500 gal/min	WM-SC4 (New Well)		1	\$8.0	\$0.0	\$8.0
East Orange County Water District	Jun-2024	Ion Exchange	3,200 gal/min	Treatment for East and VanderWerff Wells	19,000	2	\$8.9	\$8.9	\$0.0
Golden State Water Company	Nov-2023	Ion Exchange	3,200 gal/min	Bradford and Fairhaven Plants	46,300	3	\$4.4	\$4.4	\$0.0
	Jul-2027	Ion Exchange	940 gal/min	Sherrill Plant		1	\$3.1	\$0.8	\$2.4
	Dec-2028	Ion Exchange	7,620 gal/min	La Jolla, Fern Plants		3	\$8.3	\$0.5	\$7.8
	Dec-2028	Ion Exchange	7,620 gal/min	Clair, Beach, and Dale Plants		4	\$12.8	\$0.9	\$11.9
	Dec-2030	Ion Exchange	2,500 gal/min	Lowden		1	\$8.0	\$0.0	\$8.0
	Dec-2030	Ion Exchange	2,500 gal/min	Orangewood		1	\$8.0	\$0.0	\$8.0
Irvine Ranch Water District	Oct-2024	Ion Exchange	3,200 gal/min	Orange Park Acres Well No. 1	125,000	1	\$7.2	\$7.2	\$0.0
Serrano Water District	Feb-2022	Ion Exchange	3,200 gal/min	Wells 3 and 5	5,659	2	\$6.0	\$6.0	\$0.0
Yorba Linda Water District	Dec-2021	Ion Exchange	13,200 gal/min	All ten (10) Yorba Linda wells	11,786	10	\$27.7	\$27.7	\$0.0
Note: \$M = Dollars in Millions						106	\$607.8	\$318.9	\$288.9

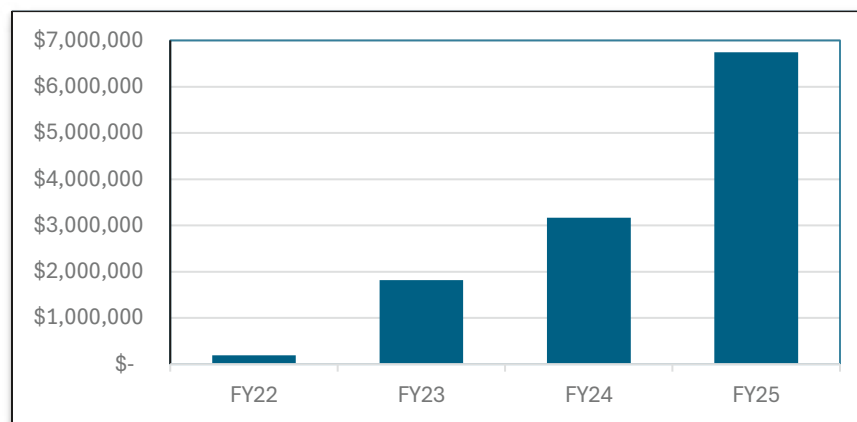
Source: Multiple OCWD and water retailer data

Figure 17 - Summary of PFAS Treatment Facilities

Operations and Maintenance Costs

Under the PFAS Treatment Facilities and Program Agreement, OCWD reimburses 50 percent of eligible operations and maintenance (O&M) costs incurred by participating water agencies. Eligible O&M costs include treatment media replacement, power and chemical costs, routine maintenance, repairs, staffing, compliance monitoring, regulatory compliance activities, additional pumping, waste disposal, sewer costs, and other necessary system maintenance expenses.

Actual PFAS treatment expenses (see Figure 18), which can be found in Annual Comprehensive Financial Reports (ACFRs),⁶⁶ varied primarily due to construction timing and the performance of ion exchange resin media. Specialized resins are a key element in PFAS treatment and help remove PFAS from water using electrostatics. Construction delays meant some treatment facilities were not operational as expected, resulting in lower O&M costs. In FY22 and FY23, initial resin media lasted longer than anticipated and reduced O&M costs. In contrast, FY25 experienced more resin changeouts than anticipated and higher O&M costs. Resin media life varies by treatment system and operating conditions, such as run time, cycling frequency, and production flow rates. OCWD is updating resin performance assumptions and changeout frequency estimates to improve future O&M forecasts.



Source: OCWD

Figure 18 – OCWD’s Share of PFAS Treatment Facility Annual O&M Cost

Program Status and Future Plans

The overall OCWD PFAS Treatment Systems Project currently includes 11 water retailers, with construction planned or underway for four additional retailers, expanding the program to 15. Fifty-three treatment systems are operational. Construction

⁶⁶ “Sound financial management,” Orange County Water District, accessed April 8, 2026, <https://www.ocwd.com/what-we-do/sound-financial-management/>.

continues on 20 additional systems, with design work underway for 24 more. Here is a list of PFAS projects in design or under construction as of May 2026:

- Golden State Water Company Wells SLON and SORG are still in planning. Well SSYC is in design and is anticipated to start construction in Fiscal Year 26/27.
- Tustin 17th Street Well is nearing the start of design.
- Huntington Beach Well 3A, Anaheim Wells 39 and 47, Tustin Edinger Well are all in the design phase and are anticipated to start construction in Fiscal Year 26/27.
- Buena Park Linden Well is currently in construction.

[Figure 19 - PFAS Monthly Cost to OCWD Service Area Residents](#) indicates the estimated average monthly cost of PFAS treatment to OCWD service area residents is \$1.42 per person. OCWD anticipates continued design and construction activity over several years.

Average PFAS Impact to OCWD Service Area Residents Over a 25 year period	
Total Capital Costs	\$570,000,000
State & Fed Grants	\$152,000,000
Litigation Proceeds	<u>\$121,000,000</u>
Net Capital Costs	\$297,000,000
Amortized Debt Costs	
	4.50% Interest Rate 25 Years \$297,000,000 Amount
Annual Debt Payment	\$20,029,391
Estimated Annual O&M Cost	<u>\$22,000,000</u>
Total Annual Cost	\$42,029,391
Total Monthly Cost	\$3,502,449
OCWD Population from 19 Member Agencies	2,469,000 persons
Monthly cost per person	<u>\$1.42</u>

Source: OCWD

Figure 19 - PFAS Monthly Cost to OCWD Service Area Residents

FINDINGS

In accordance with California Penal Code Sections 933 and 933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency affected by the findings presented in this section. The responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury has arrived at the following six principal findings:

- F1** Commercial and industrial chemical manufacturers are a major source of PFAS contamination. Settlement litigation funds are available for community water systems to make claims.
- F2** PFAS is widespread, and contamination has been detected in Orange County groundwater sources. Community water systems are required to report PFAS monitoring results in their annual Consumer Confidence Reports.
- F3** PFAS exposure is associated with potential adverse human health effects.
- F4** OCWD has taken a proactive leadership role in addressing PFAS in the Orange County Groundwater Basin, though PFAS treatment implementation varies across local cities and water districts.
- F5** Groundwater supplies must either be treated to remove PFAS or must be replaced with imported water supplies that are significantly more expensive than groundwater. Over \$500 million is being spent on construction, operations, and maintenance of PFAS treatment facilities in Orange County.
- F6** Orange County drinking water meets or exceeds state and federal standards and is safe for consumption without additional home filtration.
- F7** Research on newer PFAS compounds and long-term exposure effects is ongoing.
- F8** There are limited online PFAS education and outreach programs among Orange County water retailers. Most retailers rely on OCWD for PFAS education and outreach. PFAS advisories were included in approximately 55% of the Orange County water retailers' annual water quality reports in 2025.

RECOMMENDATIONS

In accordance with California Penal Code Sections 933 and 933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency affected by the recommendations presented in this section. The responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury makes the following recommendations:

- R1** By September 30, 2026, Orange County Water District (OCWD), in coordination with state and federal agencies, should pursue cost recovery efforts against PFAS manufacturers to offset treatment, monitoring, and long-term remediation costs incurred by local water agencies and ratepayers. [F1, F5]
- R2** By July 1, 2029, OCWD and its member agencies should monitor PFAS in groundwater and surface water sources and promptly implement PFAS treatment when response levels are exceeded. [F2, F4]
- R3** By September 30, 2026, OCWD, in collaboration with the Orange County Health Care Agency, should update public education and guidance continually as scientific understanding and regulatory standards evolve. [F3]
- R4** By July 1, 2029, all Orange County water retailers should consistently include a PFAS advisory, treatment facilities status, and compliance information in consumer confidence reports and on agency websites, using clear and understandable language for the public. [F2, F8]
- R5** By September 30, 2026, OCWD and all Orange County water retailers should enhance coordinated public education efforts to reassure their customers about drinking water safety. [F6, F8]
- R6** By September 30, 2026, OCWD should continuously monitor national and international PFAS research developments and incorporate new findings into future groundwater management, treatment planning, and regulatory compliance strategies. [F7]

COMMENDATIONS

Many Orange County water agencies have demonstrated exceptional leadership in addressing PFAS through large-scale treatment investments, rigorous monitoring, and public communication. Together, these agencies serve more than two million residents and have implemented some of the most advanced PFAS treatment systems in the nation. The following commendations recognize high-impact programs and measurable achievements across the region.

Orange County Water District (OCWD)

OCWD has implemented the largest PFAS treatment program in the United States, designing and constructing treatment systems for over 100 impacted wells across 15 cities and retail water districts, improving water quality for approximately 1.5 million people. OCWD secured a \$94M EPA Water Infrastructure Finance and Innovation Act (WIFIA) loan, \$152M in state and federal grant funding, and \$131M in PFAS manufacturers litigation settlement funds to support this effort, which includes the build-out of more than 30 PFAS treatment facilities.

The Grand Jury offers additional commendations to OCWD and its member agencies for their collaborative cost-sharing agreement. Under this arrangement, OCWD fully funds all PFAS facility design and construction capital expenditures. Ongoing operations and maintenance costs are then shared equally, with OCWD covering 50% and each participating water retailer contributing the remaining 50% for the PFAS treatment facilities they operate. This approach reflects progressive public-sector planning, demonstrating how agencies can work together to address complex and costly challenges. It also serves as a strong model for future government/private-sector cost-sharing agreements, illustrating how thoughtful collaboration can enhance efficiency and long-term public benefit.

Anaheim Water Utility

Anaheim has launched one of the largest municipal PFAS treatment programs in the country, a multi-phase, \$150M effort to construct treatment systems at nine groundwater sites. The utility serves 64,000 metered customers, historically relying on groundwater for 80% of its supply. PFAS treatment systems for Wells 39 and 47 are among the first in a series of facilities designed to restore local production while meeting stringent state and federal standards.

Yorba Linda Water District (YLWD)

YLWD operates the J. Wayne Miller, Ph.D. Water Treatment Plant, recognized as the nation's largest PFAS ion-exchange treatment facility. The plant serves approximately 80,000 customers and has delivered PFAS-free water for nearly three consecutive years. This facility allows YLWD to optimize its groundwater resources while proactively meeting evolving PFAS regulatory standards.

RESPONSES

The following excerpts from the California Penal Code provide the requirements for public agencies to respond to the Findings and Recommendations of this Grand Jury report:

§933

(c) No later than 90 days after the grand jury submits a final report on the operations of any public agency subject to its reviewing authority, the governing body of the public agency shall comment to the presiding judge of the superior court on the findings and recommendations pertaining to matters under the control of the governing body, and every elected county officer or agency head for which the grand jury has responsibility pursuant to Section 914.1 shall comment within 60 days to the presiding judge of the superior court, with an information copy sent to the board of supervisors, on the findings and recommendations pertaining to matters under the control of that county officer or agency head and any agency or agencies which that officer or agency head supervises or controls. In any city and county, the mayor shall also comment on the findings and recommendations. All of these comments and reports shall forthwith be submitted to the presiding judge of the superior court who impaneled the grand jury. A copy of all responses to grand jury reports shall be placed on file with the clerk of the public agency and the office of the county clerk, or the mayor when applicable, and shall remain on file in those offices. One copy shall be placed on file with the applicable grand jury final report by, and in the control of the currently impaneled grand jury, where it shall be maintained for a minimum of five years.

§933.05.

(a) For purposes of subdivision (b) of Section 933, as to each grand jury finding, the responding person or entity shall indicate one of the following:

(1) The respondent agrees with the finding.

(2) The respondent disagrees wholly or partially with the finding, in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons, therefore.

(b) For purposes of subdivision (b) of Section 933, as to each grand jury recommendation, the responding person or entity shall report one of the following actions:

(1) The recommendation has been implemented, with a summary regarding the implemented action.

(2) The recommendation has not yet been implemented, but will be implemented in the future, with a timeframe for implementation.

(3) The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a timeframe for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of the public agency when applicable. This timeframe shall not exceed six months from the date of publication of the grand jury report.

(4) The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation, therefore.

(c) However, if a finding or recommendation of the grand jury addresses budgetary or personnel matters of a county agency or department headed by an elected officer, both the agency or department head and the board of supervisors shall respond if requested by the grand jury, but the response of the board of supervisors shall address only those budgetary or personnel matters over which it has some decision-making authority. The response of the elected agency or department head shall address all aspects of the findings or recommendations affecting his or her agency or department.

(d) A grand jury may request a subject person or entity to come before the grand jury for the purpose of reading and discussing the findings of the grand jury report that relates to that person or entity in order to verify the accuracy of the findings prior to their release.

(e) During an investigation, the grand jury shall meet with the subject of that investigation regarding the investigation, unless the court, either on its own determination or upon request of the foreperson of the grand jury, determines that such a meeting would be detrimental.

(f) A grand jury shall provide to the affected agency a copy of the portion of the grand jury report relating to that person or entity two working days prior to its public release and after the approval of the presiding judge. No officer, agency, department, or governing body of a public agency shall disclose any contents of the report prior to the public release of the final report.

(Amended by Stats. 1997, Ch. 443, Sec. 5. Effective January 1, 1998.)

Comments to the Presiding Judge of the Superior Court in compliance with Penal Code §933.05 are required from:

Orange County Board of Supervisors	90 Day Response Required
Findings:	F3
Recommendations:	R3
Orange County Water District Board of Directors	90 Day Response Required
Findings:	F1, F2, F3, F4, F5, F6, F7, F8
Recommendations:	R1, R2, R3, R5, R6
Orange County Health Care Agency	90 Day Response Requested
Findings:	F3
Recommendations:	R3
City of Anaheim	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
City of Brea	90 Day Response Required
Findings:	F2, F6, F8
Recommendations:	R4, R5
City of Buena Park	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
City of Fountain Valley	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5

City of Fullerton	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
City of Garden Grove	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
City of Huntington Beach	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
City of La Habra	90 Day Response Required
Findings:	F2, F6, F8
Recommendations:	R4, R5
City of La Palma	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
City of Newport Beach	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
City of Orange	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5

City of San Clemente	90 Day Response Required
Findings:	F2, F6, F8
Recommendations:	R4, R5
City of Santa Ana	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
City of Seal Beach	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
City of Tustin	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
City of Westminster	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
East Orange County Water District	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
El Toro Water District	90 Day Response Required
Findings:	F2, F6, F8
Recommendations:	R4, R5

Emerald Bay Service District	90 Day Response Required
Findings:	F2, F6, F8
Recommendations:	R4, R5
Golden State Water Company	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
Irvine Ranch Water District	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
Laguna Beach County Water District	90 Day Response Required
Findings:	F2, F6, F8
Recommendations:	R4, R5
Mesa Water District	90 Day Response Required
Findings:	F2, F4, F6, F8
Recommendations:	R2, R4, R5
Moulton Niguel Water District	90 Day Response Required
Findings:	F2, F6, F8
Recommendations:	R4, R5
Santa Margarita Water District	90 Day Response Required
Findings:	F2, F6, F8
Recommendations:	R4, R5

Serrano Water District

Findings:

Recommendations:

90 Day Response Required

F2, F4, F6, F8

R2, R4, R5

South Coast Water District

Findings:

Recommendations:

90 Day Response Required

F2, F6, F8

R4, R5

Trabuco Canyon Water District

Findings:

Recommendations:

90 Day Response Required

F2, F6, F8

R4, R5

Yorba Linda Water District

Findings:

Recommendations:

90 Day Response Required

F2, F4, F6, F8

R2, R4, R5

Acronyms

ACFRS	Annual comprehensive financial reports
ADONA	Ammonium 4 8-dioxa-3h-perfluorononanoate
AFFF	Aqueous film forming foams used frequently at airports and military bases for firefighting and emergency response training activities
AL	Regulatory Action Level The concentration of a contaminant which, if exceeded, triggers treatment or other requirements that a water system must follow
ATSDR	Agency for Toxic Substances and Disease Registry
CCR	Consumer Confidence Report
CCRD	Consumer Confidence Report Detection Levels
CDC	United States Centers for Disease Control and Prevention
CWS	Community Water System
DDW	Division of Drinking Water
DWR	Department of Water Resources
Effluent	Liquid waste from industrial facilities
EPA	US Environmental Protection Agency
FDA	Food and Drug Administration
GenX	Is a Chemours trademark name for a synthetic, short chain organofluorine chemical compound, the ammonium salt of hexafluoropropylene oxide dimer acid (HFPO-DA). It can also be used more informally to refer to the group of related fluorochemicals that are used to produce GenX.
GWRS	Ground water replacement system
HALF LIFE	Time required for a quantity to reduce to half of its original value
HFPO-DA	Hexafluoropropylene oxide dimer acid
MSS	Multi site study
MCL	Glossary of Terms Maximum Contaminant Level. The highest level of a contaminant that is allowed in drinking water. Primary MCLs are set as

close to the public health goals and maximum contaminant level goals as is economically and technologically feasible. Secondary MCLs are set to protect the odor, taste, and appearance of drinking water.

MCLG	Maximum Contaminant Level Goal. The level of a contaminant in drinking water below which there is no known or expected risk to health. The United States Environmental Protection Agency (USEPA) sets maximum contaminant level goals.
MRDL	Maximum Residual Disinfectant Level. The highest level of a disinfectant allowed in drinking water. There is convincing evidence that the addition of a disinfectant is necessary for control of microbial contaminants.
MRDLG	Maximum Residual Disinfectant Level Goal The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.
MWD	Metropolitan Water District
MWDOC	Municipal Water District of Orange County
N/A	Not applicable
ND	Not detected
NHANES	National Health and Nutrition Examination Survey
NL	California Notification Level Non-regulatory, health-based advisory levels established by the State Board for contaminants in drinking water for which an MCL has not been established
NR	Not required to be tested; < = average is less than the detection limit for reporting purposes
NTU	Nephelometric turbidity units
OCWD	Orange County Water District
O & M	Operations and Management
PAYGO	“Pay as you go”
PDWS	Primary Drinking Water Standard MCLs, MRDLs and treatment techniques (TTs) for contaminants that affect health, along with their monitoring and reporting requirements
pCi/L	picoCuries per liter

PFAS RULE Establishes enforceable drinking water standards for six PFAS chemicals

PFAS Per- and polyfluoroalkyl substances

PFBA Perfluoro Butanoic Acid

PFBS Perfluoro Butane Sulfonic Acid

PFHpA Perfluoro Heptanoic Acid

PFHxA Perfluoro Hexanoic Acid

PFHxS Perfluoro Hexane Sulfonic Acid

PFNA Perfluorononanoic acid

PFOA Perfluoro Octanoic Acid

PFOS Perfluoro Octane Sulfonic Acid

PFPeA Perfluoro Pentanoic Acid

PHG Public Health Goal The level of a contaminant in drinking water below which there is no known or expected risk to health. The California Environmental Protection Agency (CalEPA) sets public health goals.

PPB Parts per billion

PPM Parts per million

PPT Parts per trillion

PQL Practical Quantitation Level

PWS Public water supply

RAA Highest Running Annual Average

SAR Santa Ana River

SDWA Safe Drinking Water Act

SDWIS Safe Drinking Water Information System

SWRCB State Water Resources Control Board

WIFIA Water Infrastructure Finance and Innovation Act

TT Treatment Technique. A required process intended to reduce the level of a contaminant in drinking water

UCI University of California, Irvine

UCMR	Unregulated Contaminant Monitoring Rule
US	United States
µmho/cm	Micromho per centimeter (equivalent to 1 microsiemens/cm)

Glossary

Cross Sectional Study	Examines prevalence of a condition or characteristic at a single point in time across a population to identify patterns, associations, and risk factors
Ion Exchange Technology	Process that removes/replaces dissolved ions in a solution using solid materials.
Non-Community Water Systems	Public water systems at locations where people do not reside
Non-Transient Water Systems	Public water systems that service at least 25 of the same people over six months of the year, but do not live there

Bibliography

California Department of Water Resources. "California's Groundwater Live: Well Infrastructure." Accessed April 13, 2026.

<https://storymaps.arcgis.com/stories/f2b252d15a0d4e49887ba94ac17cc4bb>.

CAL FIRE. "SB-1044 Compliance: Phasing Out PFAS in Class B Firefighting Foam." Accessed April 17, 2026. <https://osfm.fire.ca.gov/what-we-do/pipeline-safety-and-cupa/fire-fighting-equipment-and-foam-pfas>

California Health and Safety Code Division 104 Part 12 Chapter 4 California Safe Drinking Water Act Section 116275. Accessed March 30, 2026. <https://law.justia.com/codes/california/code-hsc/division-104/part-12/chapter-4/article-1/section-116275/>.

California State Water Resources Control Board. "PFAS Per- and Polyfluoroalkyl Substances." Accessed April 18, 2026. <https://www.waterboards.ca.gov/pfas>.

California State Water Resources Control Board, Division of Drinking Water. Safe Drinking Water Information System (SDWIS). "Drinking Water Watch." Accessed April 26, 2026. <https://sdwis.waterboards.ca.gov/PDWW/>.

Centers for Disease Control and Prevention. "Drinking Water Standards and Regulations: An Overview," Accessed May 21, 2026, <https://www.cdc.gov/drinking-water/about/drinking-water-standards-and-regulations-an-overview.html>.

Centers for Disease Control and Prevention. "National Health and Nutrition Examination Survey. NHANES 2017-18 Overview." Accessed April 16, 2026. <https://wwwn.cdc.gov/nchs/nhanes/continuousnhanes/default.aspx?BeginYear=2017>.

Centers for Disease Control and Prevention ATSDR. Per- and Polyfluoroalkyl Substances (PFAS) and Your Health, "Fast Facts: PFAS in the U.S. Population," Accessed April 16, 2026, <https://www.atsdr.cdc.gov/pfas/data-research/facts-stats/index.html>.

Centers for Disease Control and Prevention ATSDR. Per- and Polyfluoroalkyl Substances (PFAS) and Your Health. "Multi-site Study." Accessed April 16, 2026. <https://www.atsdr.cdc.gov/pfas/health-studies/multi-site-study.html>.

Centers for Disease Control and Prevention ATSDR. Per- and Polyfluoroalkyl Substances (PFAS) and Your Health. "Preventing PFAS Exposure." Accessed April 16, 2026. <https://www.atsdr.cdc.gov/pfas/prevent-exposure/your-body.html>.

Centers for Disease Control and Prevention ATSDR. Per- and Polyfluoroalkyl Substances (PFAS) and Your Health. "Testing for PFAS." Accessed April 17, 2026. <https://www.atsdr.cdc.gov/pfas/blood-testing/index.html>.

Centers for Disease Control and Prevention ATSDR. "PFAS Multi-site Study (MSS) Virtual Open House." July 28, 2025. <https://www.atsdr.cdc.gov/media/pdfs/2025/08/Open-House-Slides-508.pdf>.

Detwiler, Russ. "Reconstructing historical PFAS concentrations in groundwater using a reduced-order modeling framework." Albuquerque NM, InterPore2025. May 20, 2025. Accessed April 16, 2026. <https://events.interpore.org/event/56/contributions/7590/>.

EcoPulse. "Understanding the PFAS Cycle." Accessed April 13, 2026. <https://www.ecopulsenow.com/insights/understanding-the-pfas-cycle>.

Happy Family [Cover page, top row, right image of family] – [Happy Family Enjoying Fresh Water Together at Home. Concept drink of clear water. Stock Photo | Adobe Stock](#)

Lab Glass [Cover page, middle row, right image of chemical lab glass] - [Blue laboratory Images - Free Download on Magnific \(formerly Freepik\)](#), 2026

National Water Research Institute. *Report of the Scientific Advisory Panel: Orange County Water District's Santa Ana River Water Quality and Health Study*. Fountain Valley, CA, 2004. Accessed April 14, 2026. <https://www.ocwd.com/wp-content/uploads/sarwqh-final-nwri-panel-report-2004.pdf>.

Orange County Grand Jury (2025 – 2026). [Cover page, bottom row image of Yorba Linda Water District PFAS Treatment Facility]. Photograph. August 27, 2025. Unpublished internal documentation.

Orange County Water District. "How water works in Orange County." Accessed May 21, 2026. <https://www.ocwd.com/learning-center/how-water-works-in-oc/>.

Orange County Water District. "PFAS education center." Accessed April 8, 2026. <https://www.ocwd.com/what-we-do/water-quality/pfas/>.

Orange County Water District. "Sound financial management." Accessed April 8, 2026. <https://www.ocwd.com/what-we-do/sound-financial-management/>.

Pitcher Pouring [Cover page, top row, left image] - [Pouring Water into a Glass - Refreshment and Hydration Concept on Wooden Table. 76812373 Stock Photo at Vecteezy](#), 2026

Rosato, Isabelle, et al. "Estimation of per- and polyfluoroalkyl substances (PFAS) half-lives in human studies: a systematic review and meta-analysis." *Environmental Research*. Volume 242. 1 February 2024, 117743. Accessed April 13, 2026. <https://www.sciencedirect.com/science/article/pii/S0013935123025471?via%3Dihub>.

Solano Public Health. "Orange County launches first water plant to remove PFAS toxins." Accessed April 29, 2026. [Orange County launches first water plant to remove PFAS toxins](#).

Steenland, Kyle, Fletcher, Tony, and Savitz, David A. "Epidemiologic Evidence on the Health Effects of Perfluorooctanoic Acid (PFOA)." *National Library of Medicine*. Accessed May 12, 2026. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2920088/>.

Stricklin Tommy, Magnifying Glass [Cover page middle row, left image of magnifying glass] – [What Is TDS in Drinking Water? Levels, Testing & Solutions | SpringWell](#), 2026

Sunderland, Elsie M, et al. "A review of the pathways of human exposure to poly- and perfluoroalkyl substances (PFASs) and present understanding of health effects." *Journal of Exposure Science & Environmental Epidemiology*. 3 November 2018. Accessed March 16, 2026. https://sunderlandlab.org/assets/sunderland_jeseerev_2018wsi.pdf.

SWRCB. "Drinking Water Notification Levels." Accessed May 21, 2026. https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/NotificationLevels.html.

SWRCB. "Exhibit A – List of Sources and Required Monitoring Frequency." Accessed May 21, 2026. https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.waterboards.ca.gov%2Fdrinking_water%2Fcertlic%2Fdrinkingwater%2Fpfas_ddw_general_order%2Fdocs%2Forder-dw-2025-0002-ddw-exhibit-a.xlsx&wdOrigin=BROWSELINK.

SWRCB. "ORDER DW 2025-0002-DDW." Accessed May 21, 2026. https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas_ddw_general_order/docs/order-dw-2025-0002-ddw-pfas-initial-monitoring.pdf.

SWRCB. "PFAS - Frequently Asked Questions," 5. [3] 3M Company, "Fluorochemical use, distribution and release overview," AR226-0550, 1999. updated March 19, 2020. Accessed March 25, 2026. https://www.waterboards.ca.gov/pfas/docs/master_pfas_faq_mar.pdf.

SWRCB. "PFAS - Frequently Asked Questions." 5. [6] A. M. Calafat, L.-Y. Wong, Z. Kuklennyik, J. A. Reidy, and L. L. Needham, "Polyfluoroalkyl Chemicals in the US Population: Data from the National Health and Nutriti Examination Survey (NHANES) 2003–2004 and Comparisons with NHANES 1999–2000," *Environ. Health Perspect.*, vol. 115, no. 11, pp. 1596– 1602, Nov. 2007. https://www.waterboards.ca.gov/pfas/docs/master_pfas_faq_mar.pdf.

SWRCB. "PFAS - Frequently Asked Questions," 5. [8] CDC, "National Report on Human Exposure to Environmental Chemicals," 2019. Accessed April 23, 2026. https://www.waterboards.ca.gov/pfas/docs/master_pfas_faq_mar.pdf.

SWRCB, "PFAS - Frequently Asked Questions." 8. [1] Agency for Toxic Substances and Disease Registry (ATSDR), "Toxicological Profile for Perfluoroalkyls, Draft for Public Comment," 2018. https://www.waterboards.ca.gov/pfas/docs/master_pfas_faq_mar.pdf.

SWRCB. "PFAS DDW General Orders." Accessed May 21, 2026. https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas_ddw_general_order/.

SWRCB. "Per- and Polyfluoroalkyl Substances (PFAS), What are PFAS?" Accessed May 21, 2026. https://www.waterboards.ca.gov/santaana/water_issues/programs/pfas/.

Temkin, Alexis and Subramaniam, Varun. "Forever chemicals' contaminate nearly 40% of non-organic California-grown produce." Environmental Working Group. Accessed April 6, 2026. <https://www.ewg.org/research/forever-chemicals-contaminate-nearly-40-non-organic-california-grown-produce>.

University of California, Irvine. "UCI PFAS Health Study." Accessed May 12, 2026. <https://sites.uci.edu/pfas/>.

University of California, Irvine. "UCI PFAS Health Study, Frequently Asked Questions." Accessed May 12, 2026. <https://sites.uci.edu/pfas/frequently-asked-questions/>.

University of California, Irvine, Wen School of Population & Public Health. "The 'Forever Chemical' Detective." February 12, 2026. Accessed May 12, 2026. <https://publichealth.uci.edu/2026/02/12/the-forever-chemical-detective/>.

United States EPA. "Consumer Confidence Report Rule: A Quick Reference Guide." Accessed April 18, 2026. https://www.epa.gov/sites/default/files/2014-05/documents/guide_qrg_ccr_2011.pdf.

United States EPA. "Enforcement and Compliance History Online (ECHO). Facility Search – Enforcement and Compliance Data." Accessed April 26, 2026. <https://echo.epa.gov/facilities/facility-search>.

United States EPA. "Learn About the Unregulated Contaminant Monitoring Rule." Accessed April 7, 2026. <https://www.epa.gov/dwucmr/learn-about-unregulated-contaminant-monitoring-rule>.

United States EPA. "Per- and Polyfluoroalkyl Substances (PFAS)." Accessed April 18, 2026. <https://www.epa.gov/pfas>.

United States EPA. "Per- and Polyfluoroalkyl Substances (PFAS), Final PFAS National Primary Drinking Water Regulation." Accessed May 12, 2026. <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>.

United States EPA. "PFAS Explained." Accessed March 11, 2026. <https://www.epa.gov/pfas/pfas-explained>.

United States EPA. "Public Notification Rule." Accessed April 7, 2026. <https://www.epa.gov/dwreginfo/public-notification-rule#rule-summary>.

United States EPA. "Risk Management for Per- and Polyfluoroalkyl Substances (PFAS) under TSCA." Accessed May 21, 2026. <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-management-and-polyfluoroalkyl-substances-pfas>.

United States EPA. "Summary of the Safe Drinking Water Act," describing statutory authority at 42 U.S.C. § 300f et seq., Accessed May 21, 2026, <https://www.epa.gov/laws-regulations/summary-safe-drinking-water-act>.

Zimmerman Janet, Santa Ana River [Cover page top row, center image], [Water agencies pledge cooperation to help the Santa Ana River – Orange County Register](#), published September 20, 2014

Appendix A

Unregulated Contaminated Monitoring Rule (UCMR) Contaminants Lists, PFAS Contaminants

Contaminant/CASRN ¹	MRL (µg/L) ²	Use or Environmental Source ³
Perfluorinated Compounds: EPA Method 537		
perfluorooctanesulfonic acid (PFOS) 1763-23-1	0.04	Surfactant or emulsifier; used in fire-fighting foam, circuit board etching acids, alkaline cleaners, floor polish, and as a pesticide active ingredient for insect bait traps; U.S. manufacture of PFOS phased out in 2002; however, PFOS still generated incidentally
perfluorooctanoic acid (PFOA) 335-67-1	0.02	Perfluorinated aliphatic carboxylic acid; used for its emulsifier and surfactant properties in or as fluoropolymers (such as Teflon), fire-fighting foams, cleaners, cosmetics, greases and lubricants, paints, polishes, adhesives and photographic films
perfluorononanoic acid (PFNA) 375-95-1	0.02	Manmade chemical; used in products to make them stain, grease, heat and water resistant
perfluorohexanesulfonic acid (PFHxS) 355-46-4	0.03	Manmade chemical; used in products to make them stain, grease, heat and water resistant
perfluoroheptanoic acid (PFHpA) 375-85-9	0.01	Manmade chemical; used in products to make them stain, grease, heat and water resistant
perfluorobutanesulfonic acid (PFBS) 375-73-5	0.09	Manmade chemical; used in products to make them stain, grease, heat and water resistant

1. CASRN - Chemical Abstracts Service Registry Number
2. MRL - Minimum Reporting Level
3. "Use or Environmental Source" further documented in UCMR 3 Contaminants – Information Compendium. EPA 815-B-11-001. January 2012

Figure 20 - UCMR 3 Contaminants List, PFAS Contaminants

Contaminant	CASRN ¹	MRL ² (µg/L)	Additional Information
25 PFAS: EPA Method 533			
11-chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (11Cl-PF3OUdS)	763051-92-9	0.005	PFAS are a group of synthetic chemicals used in a wide range of consumer products and industrial applications including: non-stick cookware, water-repellent clothing, stain-resistant fabrics and carpets, cosmetics, firefighting foams, electroplating, and products that resist grease, water, and oil. PFAS are found in the blood of people and animals and in water, air, fish, and soil at locations across the United States and the world.
1H,1H, 2H, 2H-perfluorodecane sulfonic acid (8:2FTS)	39108-34-4	0.005	
1H,1H, 2H, 2H-perfluorohexane sulfonic acid (4:2FTS)	757124-72-4	0.003	
1H,1H, 2H, 2H-perfluorooctane sulfonic acid (6:2FTS)	27619-97-2	0.005	
4,8-dioxa-3H-perfluorononanoic acid (ADONA)	919005-14-4	0.003	
9-chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (9Cl-PF3ONS)	756426-58-1	0.002	
hexafluoropropylene oxide dimer acid (HFPO-DA)(GenX)	13252-13-6	0.005	
nonafluoro-3,6-dioxaheptanoic acid (NFDHA)	151772-58-6	0.02	
perfluoro (2-ethoxyethane) sulfonic acid (PFEESA)	113507-82-7	0.003	
perfluoro-3-methoxypropanoic acid (PFMPA)	377-73-1	0.004	
perfluoro-4-methoxybutanoic acid (PFMBA)	863090-89-5	0.003	
perfluorobutanesulfonic acid (PFBS)	375-73-5	0.003	
perfluorobutanoic acid (PFBA)	375-22-4	0.005	
perfluorodecanoic acid (PFDA)	335-76-2	0.003	
perfluorododecanoic acid (PFDoA)	307-55-1	0.003	
perfluoroheptanesulfonic acid (PFHpS)	375-92-8	0.003	
perfluoroheptanoic acid (PFHpA)	375-85-9	0.003	
perfluorohexanesulfonic acid (PFHxS)	355-46-4	0.003	
perfluorohexanoic acid (PFHxA)	307-24-4	0.003	
perfluorononanoic acid (PFNA)	375-95-1	0.004	
perfluorooctanesulfonic acid (PFOS)	1763-23-1	0.004	
perfluorooctanoic acid (PFOA)	335-67-1	0.004	
perfluoropentanesulfonic acid (PFPeS)	2706-91-4	0.004	
perfluoropentanoic acid (PFPeA)	2706-90-3	0.003	
perfluoroundecanoic acid (PFUnA)	2058-94-8	0.002	
4 PFAS: EPA Method 537.1			
N-ethyl perfluorooctanesulfonamidoacetic acid (NEtFOSAA)	2991-50-6	0.005	See above for PFAS information.
N-methyl perfluorooctanesulfonamidoacetic acid (NMeFOSAA)	2355-31-9	0.006	
perfluorotetradecanoic acid (PFTA)	376-06-7	0.008	
perfluorotridecanoic acid (PFTrDA)	72629-94-8	0.007	

1. CASRN - Chemical Abstracts Service Registry Number
2. MRL - Minimum Reporting Level

Figure 21 - UCMR 5 Contaminants List, PFAS Contaminants

State Water Resources Control Board PFAS General Monitoring Orders, 2020-2025

SWRCB Order Exhibit Title	Internet URL Web Address
2020 SWRCB General Order DW 2020-0003-DDW	https://www.waterboards.ca.gov/board_decisions/adopted_orders/drinking_water/2020/pfas_go_2020_0003_ddw/pfas_go_2020_0003_ddw.pdf
Exhibit A – List of Sources Subject to General Order No. DW 2020-0003-DDW (for DDW Section 5),	https://wqts.com/wp-content/uploads/2020/09/go_exhibit_a_section5.pdf
2021 SWRCB General Order DW-2021-0001-DDW	https://www.waterboards.ca.gov/board_decisions/adopted_orders/drinking_water/2021/pfas_go_2021_0001_ddw/a5.pdf
Exhibit A – List of Sources Subject to General Order No. DW 2021-0001-DDW (For DDW Section 5)	https://www.waterboards.ca.gov/board_decisions/adopted_orders/drinking_water/2021/pfas_go_2021_0001_ddw/a5.pdf
2022 Amended General Order DW 2022-0001-DDW	https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas_ddw_general_order/docs/amended-pfas-general-order-2022-final.pdf
Exhibit A – List of Sources Subject to General Order No. DW 2022-0001-DDW (Amended)	https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas_ddw_general_order/docs/pfas_go_2022-0001-DDW_ExhibitA.pdf
2025 SWRCB General Order DW 2025-0002-DDW	https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/pfas_ddw_general_order/docs/order-dw-2025-0002-ddw-pfas-initial-monitoring.pdf
Exhibit A – List of Sources Subject to General Order DW 2025-0002-DDW	https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.waterboards.ca.gov%2Fdrinking_water%2Fcertlic%2Fdrinkingwater%2Fpfas_ddw_general_order%2Fdocs%2Forder-dw-2025-0002-ddw-exhibit-a.xlsx&wdOrigin=BROWSELINK

Figure 22 - SWRCB PFAS General Monitoring Orders Issued 2020 through 2025

State Water Resources Control Board General Monitoring Orders PFAS Constituents Lists

General Order No. DW 2020-0003-DDW		
EXHIBIT B		
CONSUMER CONFIDENCE REPORT DETECTION LEVELS (CCRDL)		
	Constituent	CCRDL, ng/L
1	PERFLUOROBUTANESULFONIC ACID (PFBS)	4
2	PERFLUORONONANOIC ACID (PFNA)	4
3	PERFLUORODECANOIC ACID (PFDA)	4
4	PERFLUOROTETRADECANOIC ACID (PFTA)	4
5	HEXAFLUOROPROPYLENE OXIDE DIMER ACID (HFPO-DA)	4
6	4,8-DIOXA-3H-PERFLUORONONANOIC ACID (ADONA)	2
7	PERFLUOROHEPTANOIC ACID (PFHpA)	4
8	N-ETHYL PERFLUOROOCTANESULFONAMIDOACETIC ACID	4
9	PERFLUORODODECANOIC ACID (PFDoA)	4
10	PERFLUOROTRIDECANOIC ACID (PFTrDA)	4
11	9-CHLOROHEXADEC AFLUORO-3-OXANONE-1-SULFONIC ACID	2
12	PERFLUOROOCTANE SULFONIC ACID (PFOS)	4
13	PERFLUOROHEXANE SULFONIC ACID (PFHxS)	4
14	N-METHYL PERFLUOROOCTANESULFONAMIDOACETIC ACID	4
15	PERFLUOROHEXANOIC ACID (PFHxA)	4
16	PERFLUOROUNDECANOIC ACID (PFUnA)	4
17	11-CHLOROEICOSAFLUORO-3-OXAUNDECANE-1-SULFONIC ACID	2
18	PERFLUOROOCTANOIC ACID (PFOA)	4

NOTES:

1. The CCRDL is based on a review of the reporting levels reported for monitoring conducted between August and December 2019. Specifically, the SWB calculated the CCRDL as the reporting level that was achievable in 90 percent of all negative result reported during that period. Results were rounded to the nearest whole number.
2. For HFPO-DA, the rounded CCRDL is lower than the 90th percentile of conveyed reporting levels based on consultation with the laboratory reporting the highest volume of results, and their statement that a reporting level of 4 ng/L (4 ppt) could readily be achieved.

Figure 23 - SWRCB General Monitoring Order 2020-0003-DDW, PFAS Constituents

General Order No. DW 2021-0001-DDW					
EXHIBIT B					
CONSUMER CONFIDENCE REPORT DETECTION LEVELS (CCRD) and ADVISORY LEVELS					
	Constituent	CCRD ¹ , ng/L	Notification Level, ng/L	Response Level, ng/L	Exceedance Methodology ³
1	PERFLUOROBUTANESULFONIC ACID (PFBS) ⁴	4	-	-	-
2	PERFLUORONONANOIC ACID (PFNA)	4			
3	PERFLUORODECANOIC ACID (PFDA)	4			
4	PERFLUOROTETRADECANOIC ACID (PFTA)	4			
5	HEXAFLUOROPROPYLENE OXIDE DIMER ACID (HFPO-DA) ²	4			
6	4,8-DIOXA-3H-PERFLUORONONANOIC ACID (ADONA)	2			
7	PERFLUOROHEPTANOIC ACID (PFHpA)	4			
8	N-ETHYL PERFLUOROOCTANESULFONAMIDOACETIC ACID	4			
9	PERFLUORODODECANOIC ACID (PFDaA)	4			
10	PERFLUOROTRIDECANOIC ACID (PFTTrDA)	4			
11	9-CHLOROHEXADEC AFLUORO-3-OXANONE-1-SULFONIC ACID	2			
12	PERFLUOROOCTANE SULFONIC ACID (PFOS)	4	6.5	40	QRAA
13	PERFLUOROHEXANE SULFONIC ACID (PFHxS)	4			
14	N-METHYL PERFLUOROOCTANESULFONAMIDOACETIC ACID	4			
15	PERFLUOROHEXANOIC ACID (PFHxA)	4			
16	PERFLUOROUNDECANOIC ACID (PFUnA)	4			
17	11-CHLOROEICOSAFLUORO-3-OXAUNDECANE-1- SULFONIC ACID	2			
18	PERFLUOROOCTANOIC ACID (PFOA)	4	5.1	10	QRAA

Figure 24 - SWRCB General Monitoring Order 2021-0001-DDW, PFAS Constituents

Order DW-2022-0001-DDW (Amended)
Exhibit B - CONSUMER CONFIDENCE REPORT INFORMATION AND
NOTIFICATION AND RESPONSE LEVELS

Table 1 - Consumer Confidence Report Detection Levels (CCRDL) – EPA Method 533

Constituent	CCRDL (ng/L)	U.S. EPA MCL (ng/L)
11-chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (11Cl-PF3OUdS)	2.0	--
1H,1H, 2H, 2H-perfluorodecane sulfonic acid (8:2FTS)	5.0	--
1H,1H, 2H, 2H-perfluorohexane sulfonic acid (4:2FTS)	2.0	--
1H,1H, 2H, 2H-perfluorooctane sulfonic acid (6:2FTS)	5.0	--
4,8-dioxa-3H-perfluorononanoic acid (ADONA)	2.0	--
9-chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (9Cl-PF3ONS)	2.0	--
hexafluoropropylene oxide dimer acid (HFPO-DA) (GenX)	2.0	10
nonafluoro-3,6-dioxaheptanoic acid (NFDHA)	2.0	--
perfluoro (2-ethoxyethane) sulfonic acid (PFEESA)	2.0	--
perfluoro-3-methoxypropanoic acid (PFMPA)	2.0	--
perfluoro-4-methoxybutanoic acid (PFMBA)	2.0	--
perfluorobutanesulfonic acid (PFBS)	2.0	--
perfluorobutanoic acid (PFBA)	2.0	--
perfluorodecanoic acid (PFDA)	2.0	--
perfluorododecanoic acid (PFDoA)	2.0	--
perfluoroheptanesulfonic acid (PFHpS)	2.0	--
perfluoroheptanoic acid (PFHpA)	2.0	--
perfluorohexanesulfonic acid (PFHxS)	2.0	10
perfluorohexanoic acid (PFHxA)	2.0	--
perfluorononanoic acid (PFNA)	2.0	10
perfluorooctanesulfonic acid (PFOS)	2.0	4.0
perfluorooctanoic acid (PFOA)	2.0	4.0
perfluoropentanesulfonic acid (PFPeS)	2.0	--
perfluoropentanoic acid (PFPeA)	2.0	--
perfluoroundecanoic acid (PFUnA)	2.0	--

Figure 25 - SWRCB General Monitoring Order 2022-0001-DDW, PFAS Constituents

Order DW-2025-0002-DDW
Exhibit B - CONSUMER CONFIDENCE REPORT INFORMATION AND
NOTIFICATION AND RESPONSE LEVELS

Table 1 - Consumer Confidence Report Detection Levels (CCRD)

Constituent	CCRDL (ng/L)	U.S. EPA MCL (ng/L)
11-chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (11Cl-PF3OUdS)	2.0	--
1H,1H, 2H, 2H-perfluorodecane sulfonic acid (8:2FTS)	5.0	--
1H,1H, 2H, 2H-perfluorohexane sulfonic acid (4:2FTS)	2.0	--
1H,1H, 2H, 2H-perfluorooctane sulfonic acid (6:2FTS)	5.0	--
4,8-dioxa-3H-perfluorononanoic acid (ADONA)	2.0	--
9-chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (9Cl-PF3ONS)	2.0	--
hexafluoropropylene oxide dimer acid (HFPO-DA) (GenX)	2.0	10
nonafluoro-3,6-dioxaheptanoic acid (NFDHA)	2.0	--
perfluoro (2-ethoxyethane) sulfonic acid (PFEEESA)	2.0	--
perfluoro-3-methoxypropanoic acid (PFMPA)	2.0	--
perfluoro-4-methoxybutanoic acid (PFMBA)	2.0	--
perfluorobutanesulfonic acid (PFBS)	2.0	--
perfluorobutanoic acid (PFBA)	2.0	--
perfluorodecanoic acid (PFDA)	2.0	--
perfluorododecanoic acid (PFDoA)	2.0	--
perfluoroheptanesulfonic acid (PFHpS)	2.0	--
perfluoroheptanoic acid (PFHpA)	2.0	--
perfluorohexanesulfonic acid (PFHxS)	2.0	10
perfluorohexanoic acid (PFHxA)	2.0	--
perfluorononanoic acid (PFNA)	2.0	10
perfluorooctanesulfonic acid (PFOS)	2.0	4.0
perfluorooctanoic acid (PFOA)	2.0	4.0
perfluoropentanesulfonic acid (PFPeS)	2.0	--
perfluoropentanoic acid (PFPeA)	2.0	--
perfluoroundecanoic acid (PFUnA)	2.0	--
n-ethyl perfluorooctanesulfonamidoacetic acid (NEtFOSSA)	5.0	--
n-methyl perfluorooctanesulfonamidoacetic acid (NMeFOSSA)	5.0	--
perfluorotetradecanoic acid (PFTA)	2.0	--
perfluorotridecanoic acid (PFTrDA)	2.0	--

Figure 26 - SWRCB General Monitoring Order 2025-0002-DDW, PFAS Constituents

Appendix B

Eight Content Requirements of a CCR	
▶	Item 1: Water System Information – Name/phone number of a contact person; information on public participation opportunities.
▶	Item 2: Source(s) of Water.
▶	Item 3: Definitions – Maximum Contaminant Level (MCL); MCL Goal (MCLG); Treatment Technique (TT); Action Level (AL); Maximum Residual Disinfectant Level (MRDL); MRDL Goal (MRDLG).
▶	Item 4: Detected Contaminants – A table summarizing reported concentrations and relevant MCLs and MCLGs or MRDLs and MRDLGs; known source of detected contaminants; health effects language.
▶	Item 5: Information on Monitoring for <i>Cryptosporidium</i>, Radon, and Other Contaminants (if detected).
▶	Item 6: Compliance with Other Drinking Water Regulations (any violations and Ground Water Rule [GWR] special notices).
▶	Item 7: Variances and Exemptions (if applicable).
▶	Item 8: Required Educational Information – Explanation of contaminants in drinking water and bottled water; information to vulnerable populations about <i>Cryptosporidium</i> ; statements on nitrate, arsenic, and lead.
Optional Information	
CWSs are not limited to providing only the required information in their CCR. CWSs may want to include:	
▶	An explanation (or include a diagram of) the CWSs treatment processes.
▶	Source water protection efforts and/or water conservation tips.
▶	Costs of making the water safe to drink.
▶	A statement from the mayor or general manager.
▶	Information to educate customers about: Taste and odor issues, affiliations with programs such as the Partnership for Safe Water, opportunities for public participation, etc.
Communication Tips	
▶	Provide a consistent message. Be as simple, truthful, and straightforward as possible. Avoid acronyms, initials, and jargon.
▶	Provide links to useful information resources.
▶	Limit wordiness – write short sentences and keep your paragraphs short.
▶	Assume that consumers will only read the top half of the notice or what can be read in 10 seconds.
▶	Display important elements in bold and/or large type in the top half of the notice.
▶	Do not make your text size too small.
▶	Give a draft of your CCR to relatives or friends who are not drinking water experts and ask them if it makes sense. Ask customers for their comments when you publish the CCR.
▶	Use graphics, photographs, maps, and drawings to illustrate your message. Do not distract from your main message with graphics and/or pictures that do not complement your message.
▶	Consider printing the CCR on recycled paper and taking other steps to make the CCR “environmentally friendly.” If you hope to get your customers involved in protecting or conserving water, set a good example for them to follow.
▶	Use the CCR as an opportunity to tell your customers about all of the things that you are doing well.

Source: EPA

Figure 27 - EPA Eight Content Requirements of a Consumer Confidence Report



Growing Political Appointees and Discretionary Spending within the OC Board of Supervisors

6



Orange County Grand Jury 2025-2026

TABLE OF CONTENTS

SUMMARY	4
BACKGROUND	4
REASON FOR STUDY	5
METHOD OF STUDY	6
INVESTIGATION AND ANALYSIS.....	7
FINDINGS.....	15
RECOMMENDATIONS.....	16
REQUIRED RESPONSES	17
GLOSSARY AND ACRONYMS	19
BIBLIOGRAPHY	20
APPENDIX A.....	21
APPENDIX B.....	22
APPENDIX C	23

FIGURES

Figure 1 - Orange County Population Graph.....	8
Figure 2 - Orange County Incorporated Cities Graph	9
Figure 3 - Orange County Unincorporated Population Graph.....	9
Figure 4 - Orange County Board of Supervisors Headcount Graph.....	10
Figure 5 - County’s Average Number of Headcount Table	11
Figure 6 - Orange County Board of Supervisors’ Budget Graph.....	12

SUMMARY

Growing Political Appointees and Discretionary Spending at the Orange County Board of Supervisors.

Over the past three decades, the Orange County Board of Supervisors' (Board) administrative expansion, evidenced by their rising individual department budgets and staff headcounts, has outpaced population growth, inflation, and the County's direct service responsibilities. As much of the County has incorporated into independent cities and overall population growth has leveled off, the Board's internal administrative footprint has continued to expand. While county governance has grown more complex, these demands are more appropriately addressed by the County Executive Office and professional department leadership rather than through continued expansion of Board-controlled staff positions.

Each Orange County Supervisor now operates with a departmental budget of \$2.5 million for Fiscal Year 2025–2026, totaling \$12.5 million across all five districts. These funds support up to 12 paid staff per supervisor, inclusive of salaries and benefits, in addition a range of discretionary spending with over \$4,000,000 granted in 2025 for all five Supervisorial offices. A recent Orange County Grand Jury report identified significant increases in Supervisors' salary and financial resources, including a \$611,000 increase in the Board's individual departmental budgets over the prior fiscal year. This expansion occurred during a period of significant countywide fiscal constraint, including hiring freezes and substantial unfunded legal liabilities.

This administrative expansion has increased Supervisors' reliance on politically appointed staff for policy guidance and operational insight. This has the potential to create distance from the Board and County Executive Team including department heads who hold subject-matter expertise. Concurrently, Board-designated discretionary spending has continued to grow without clear alignment to countywide and citywide priorities. Without reform, administrative costs are likely to rise due to internal political considerations rather than operational necessity. The recommendations in this report call for a realignment of Board resources to better match service demands to reinforce transparency, fiscal discipline, collaboration with executive leadership, and overall financial accountability.

BACKGROUND

The Orange County Board of Supervisors has traditionally maintained departmental budgets and staff to support policy development, constituent services, and operational responsiveness within each district. Over time, both budgets and staffing levels have

expanded, providing Supervisors with larger teams, and increased discretionary resources. Funds not allocated to staffing are often used at the discretion of individual Board members (over \$4,000,000 distributed in 2025) supporting various projects and community-based expenditures that fall outside the County’s core service obligations.

Preliminary analysis shows that year-over-year growth in Board office budgets and headcount significantly exceeds inflation and appears disproportionate to the County’s current governance responsibilities, particularly given that the Board now employs approximately 60 support staff. This growth raises a critical question: does the increasing reliance on politically appointed staff within each supervisorial office hinder effective communication and coordination with the County Executive Team and department heads (the designated subject-matter experts) responsible for developing and implementing Board policy?

These concerns are especially relevant during periods of fiscal constraint. Historically, the Board has adjusted its own staffing levels in response to countywide financial pressures. During the Orange County bankruptcy (December 6, 1994), for example, Board-appointed staff positions were reduced from eight to six, reflecting the need to prioritize limited resources. The continued expansion of Board office staffing today contrasts with the 1994 approach and warrants renewed scrutiny of whether current staffing levels are aligned with the County’s operational priorities and fiscal realities.

REASON FOR STUDY

In December 2025, the Orange County Grand Jury issued a report regarding the curious timing and manner of the Board of Supervisors’ salary increase as part of the 2025–2026 Orange County Budget. The investigation further determined that the Board approved a \$611,000 increase to individual departmental budgets to offset the salary increase while funding previously approved staffing levels and expanded discretionary spending.

These increases occurred at a time when the County was implementing a hiring freeze due to budget shortfalls, confronting approximately \$400 million in reported liability stemming from the Airport Fire, and preparing for labor negotiations with all nine unions whose contracts are going to expire in June 2026. Given these fiscal pressures, the Orange County Grand Jury determined that a broader examination of year- to-year budget allocations and staffing growth within the Board of Supervisors’ offices is warranted.

This report, therefore, provides a data-driven analysis of the Board’s departmental budgets and headcount growth based on published annual budget information. It also

evaluates how city incorporations across Orange County have reduced the County's municipal service responsibilities, and assesses Countywide and unincorporated population trends to better understand the changing scope of the Board's direct governance obligations.

METHOD OF STUDY

The Orange County Grand Jury employed a data-driven approach to evaluate long-term trends in the Board of Supervisors' staffing levels, departmental budgets, and governance responsibilities. The methods used in this study include:

- Review of historical Orange County annual budgets to assess Board-approved staffing levels, departmental expenditures, and discretionary spending
- Analysis of quantitative data, including:
 - Board office headcount for each Supervisor
 - Board office budgets over time
 - Total Orange County population
 - Population residing in unincorporated areas
 - Percentage of County residents living in unincorporated communities
 - Number of incorporated cities within the County
- Analysis of metrics to evaluate the relationship between resource allocation and governance responsibilities, including:
 - The number of residents directly represented by the Board of Supervisors (unincorporated population)
- Review of publicly available materials, including:
 - The Orange County Board of Supervisors' official website for organizational structure, staffing information, and departmental functions
 - United States Census Bureau data for historical and current Orange County population trends
 - United States Bureau of Labor Statistics Inflation reports
- Survey of Southern California Counties Appointed Positions

These methods enabled the Orange County Grand Jury to construct an objective, year-to-year assessment of how Board office staffing, budget allocation, and discretionary practices have evolved relative to changes in County demographics, economic realities, and jurisdictional responsibilities.

INVESTIGATION AND ANALYSIS

Over the past three decades, the responsibilities, resource levels, and population dynamics surrounding the Orange County Board of Supervisors have shifted significantly. This analysis examines long-term trends in Countywide population, the shrinking number of residents living in unincorporated areas, the stabilization of city incorporations, the consistency of overall County governance services, and the corresponding growth in the Board of Supervisors' staffing levels and administrative budget. Population data and city incorporations were analyzed from 1970 onward to provide historical context, while Board budget and staffing data were evaluated from Fiscal Year 1995–1996 through Fiscal Year 2025–2026. The analysis evaluates the degree to which changes in Board resources align with the needs of the population directly served.

By the published position description of the Board of Supervisors¹ (Appendix C), they serve as the County's primary legislative authority and provide executive oversight of County operations. Their duties include setting policy, adopting budgets, overseeing County agencies, and providing municipal governance for unincorporated communities. Supervisors also maintain Administrative/District Offices that provide constituent services, policy research, communications, and administrative support.² While some growth in administrative capacity is expected over a thirty-year span, the scale and timing of this growth must be evaluated in relation to Countywide population changes, inflation, and shifts in governance responsibility, particularly reductions in direct constituents.

To provide context for evaluating budget and staffing growth over the review period, it is important to consider the regional inflation rate affecting Orange County. The Bureau of Labor Statistics (BLS) tracks consumer prices for the Los Angeles–Long Beach–Anaheim metropolitan area, which includes Orange County, and this index shows that inflation increased steadily but moderately across the last three decades. Annual inflation generally ranged between 1% and 4% for most years from the early 2000s through the mid-2010s, with notable spikes to 7.4% in 2022 during the statewide post-pandemic surge, before settling back to 3.8% in 2023. The cumulative inflation rate is approximately 120% from 1996 to 2026. When viewed against this backdrop, the Board of Supervisors' administrative budget, which grew by more than 600% during the same period, far exceeds what would be expected based on inflation alone.³

Analysis of the County's total population shows that Orange County experienced steady growth from the 1970s through the mid-2010s. During this period, the County added

¹ [Homepage | Orange County Board of Supervisors](#)

² [Homepage | Orange County Board of Supervisors](#)

³ [Inflation in Los Angeles, Long Beach and Anaheim | US Inflation Calculator](#)

several hundred thousand residents, reaching a population exceeding 3.1 million. This is reflected in the chart below, Orange County Population.

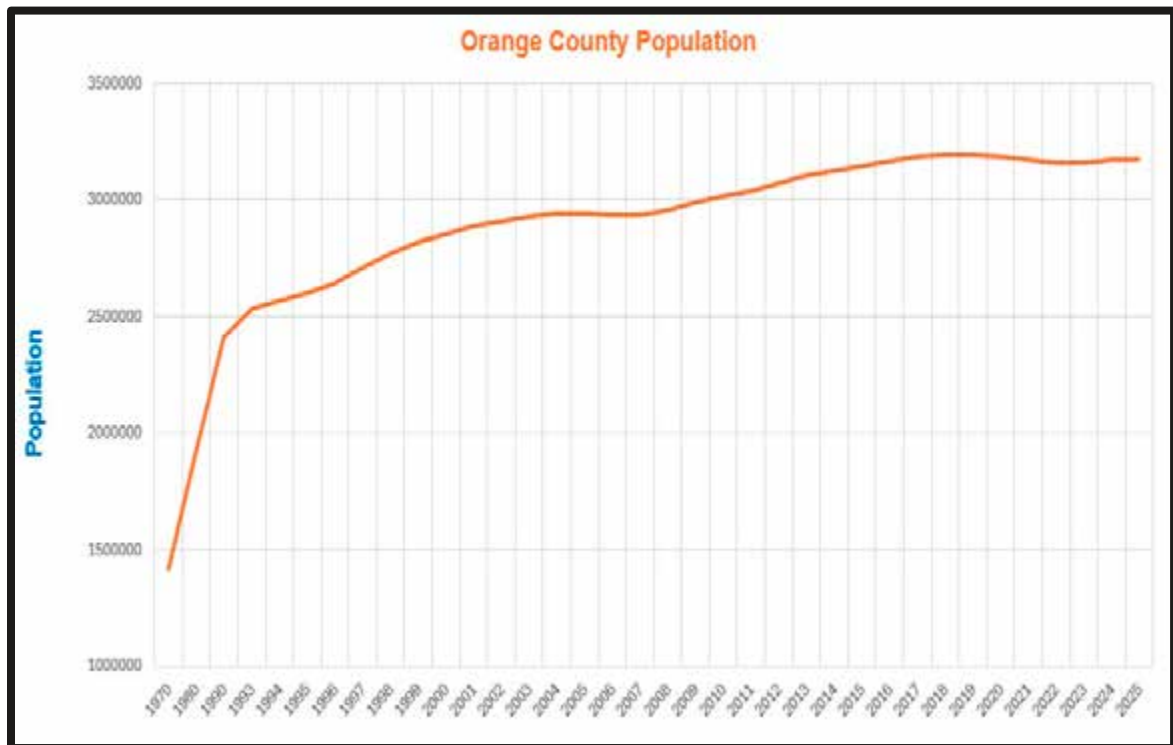


Figure 1 - Orange County Population Graph

Data source: United States Census Bureau and Orange County Data Book

Population growth flattened around 2016 and has since plateaued or, in some years, declined slightly. While population growth can sometimes drive administrative expansion in County government, the stagnation of the last decade suggests that recent increases in staffing or budget for the Board of Supervisors are not justified by population trends.

In addition to overall population trends, the number of incorporated cities in Orange County grew through the year 2000, when it reached 34 cities—and where it has remained for the past 26 years, as shown in the chart on city incorporations below. The wave of incorporations in prior decades significantly reduced the unincorporated area and population governed directly by the Board of Supervisors in its municipal capacity. Since 2000, no new incorporations have occurred, and the County's governance structure has largely stabilized.

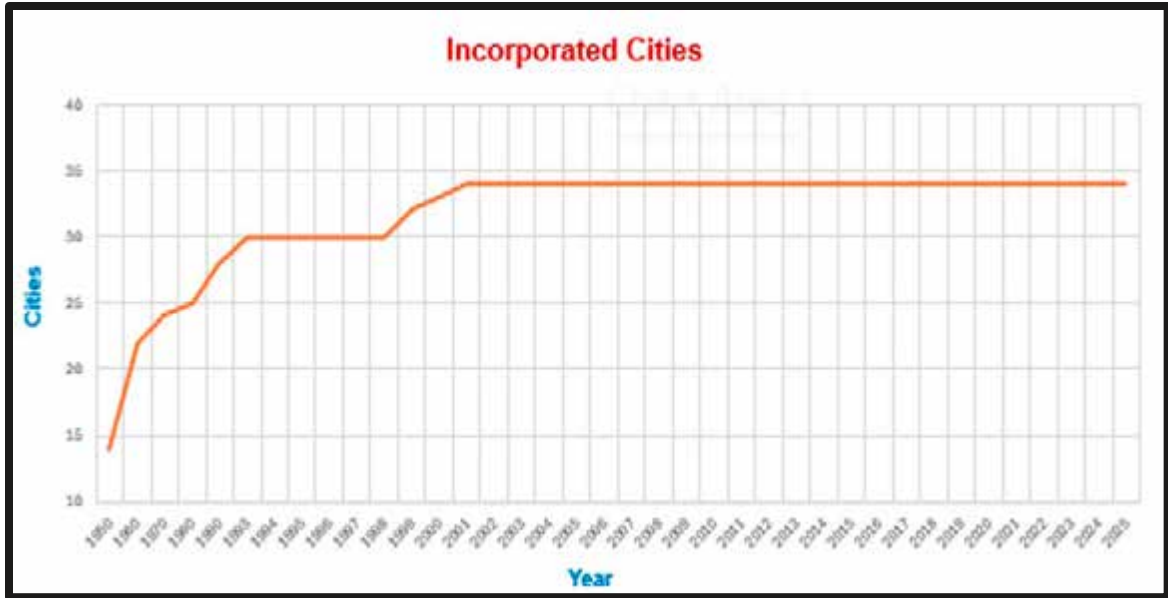


Figure 2 - Orange County Incorporated Cities Graph

Data source: Orange County Data Book

A particularly notable demographic trend is a steep decline in the population of people living in unincorporated Orange County, the residents for whom the Board continues to serve as the local municipal government. This decline is primarily attributable to city incorporations and annexations, which have reduced the citizens under direct Board governance. The chart below illustrates the unincorporated population has fallen to just over 4% of the County's total population (3.1 million), representing approximately 132,000 residents in recent years.

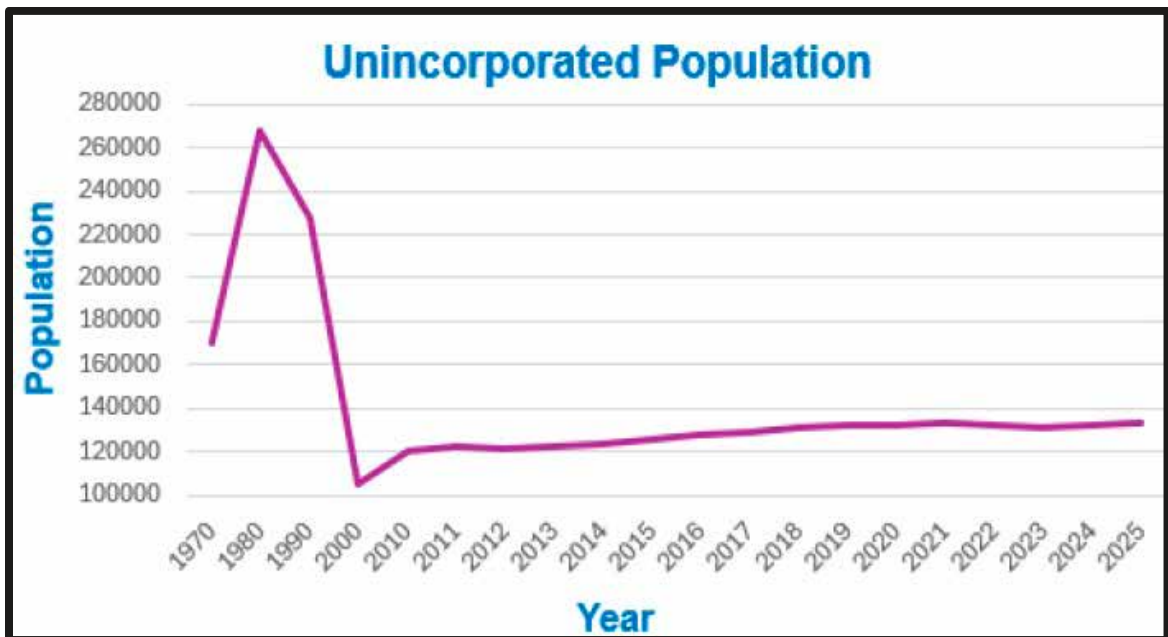


Figure 3 - Orange County Unincorporated Population Graph.

Data source: Orange County Data Book

As communities incorporated or were annexed into existing cities, the number of residents depending directly on the Board for municipal service delivery diminished. Despite this reduced municipal responsibility, neither Board staffing levels nor its administrative budget followed a corresponding downward trajectory.

Headcount within the Board’s offices remained relatively stable—between 32 and 38 positions—for nearly twenty years. Beginning around Fiscal Year 2016–17, total staffing rose from 40 to 50 positions and later expanded to 60 positions by Fiscal Year 2023–24, as reflected in the chart below on total headcount.



Figure 4 - Orange County Board of Supervisors Headcount Graph
Data source: Orange County Annual Budgets

This graph indicates an 82% increase from the levels recorded in 1996. While inflation over the same period was substantial, it does not fully account for the magnitude or timing of the budget increases, nor does the decline in direct municipal responsibility support such expansion. Staffing levels should correspond to workload rather than inflation. While state and federal mandates are increasing policy complexity, the Board should be relying on County executive expertise instead of creating their own policy advisors.

6

The rapid growth in Board office headcount over the past decade has widened the distance between the Supervisors and the County’s executive leadership structure. A recent editorial highlighted structural organizational confusion along with additional concerns.⁴

⁴ [Santana: Orange County Supervisors Confront Themselves](#)

As district offices expand, Supervisors increasingly rely on their own policy aides, analysts, and communications staff rather than on the County Executive Officer and department heads, who are the subject-matter experts responsible for managing County operations. Staff increases create a duplicative layer of analysis and decision-support that mirrors work already performed by the County’s professional management teams. The result is not only higher administrative costs but also a governance model in which significant information flow, policy development, and operational guidance occur outside the County’s established executive channels. Over time, headcount increases can diminish the value of the centralized expertise the County has built, complicate coordination, impede fiscal oversight and reduce the efficiency and effectiveness of policy implementation.

Staffing levels for support of County Boards of Supervisors across Southern California vary substantially.

County	Average Number of Staff Positions
Los Angeles County	35
San Diego County	15
Orange County	12
Riverside County	9
San Bernadino County	8
Santa Barbara County	2
Imperial County	1

Figure 5 - County’s Average Number of Headcount Table
Data Source: Website of each County

Given the shared scope of authority, the comparative review raises a central question: how are multiple counties (i.e. Riverside, San Bernardino, Santa Barbara and Imperial) to effectively perform these complex duties with relatively minimal numbers of political appointees per Supervisor? While political staff may assist individual Supervisors with policy development, communications, and coordination, the data suggest that large numbers of such positions are not inherently required to support effective governance. Counties with smaller supervisory staffs continue to function within the same statutory framework, relying more heavily on professional county executives and department leadership. This comparison invites further evaluation of whether additional appointed headcount enhances decision-making or primarily reflects local political preference rather than operational necessity.

Despite this variation, there is little meaningful differentiation in California law regarding the roles, responsibilities, and authority of county boards. In all counties, boards of

supervisors serve as the primary legislative body and executive oversight, charged with setting policy, adopting budgets, disbursing public funds, overseeing county departments, and governing unincorporated communities⁵.

While county size, geography, and population density differ, the core responsibilities of county governance remain largely consistent. All Boards must ensure that essential services are delivered by managing law enforcement budgets and corrections budgets; providing oversight of county appraisal; undertaking sound investment practices; and ensuring that health and human services meet community needs. In addition, county boards oversee the administration of substantial state and federal programs, including compliance with associated mandates and fiscal controls. These responsibilities necessarily involve complex policy considerations regardless of county size or staffing model.

In Fiscal Year 1995–1996, the Board of Supervisors administered total Board of Supervisor’s departmental budget was approximately \$1.98 million. By Fiscal Year 2025–2026, that budget had risen to \$12.5 million, representing an increase of more than 600 percent. The chart on total Board budget below shows the scale and acceleration of this growth.

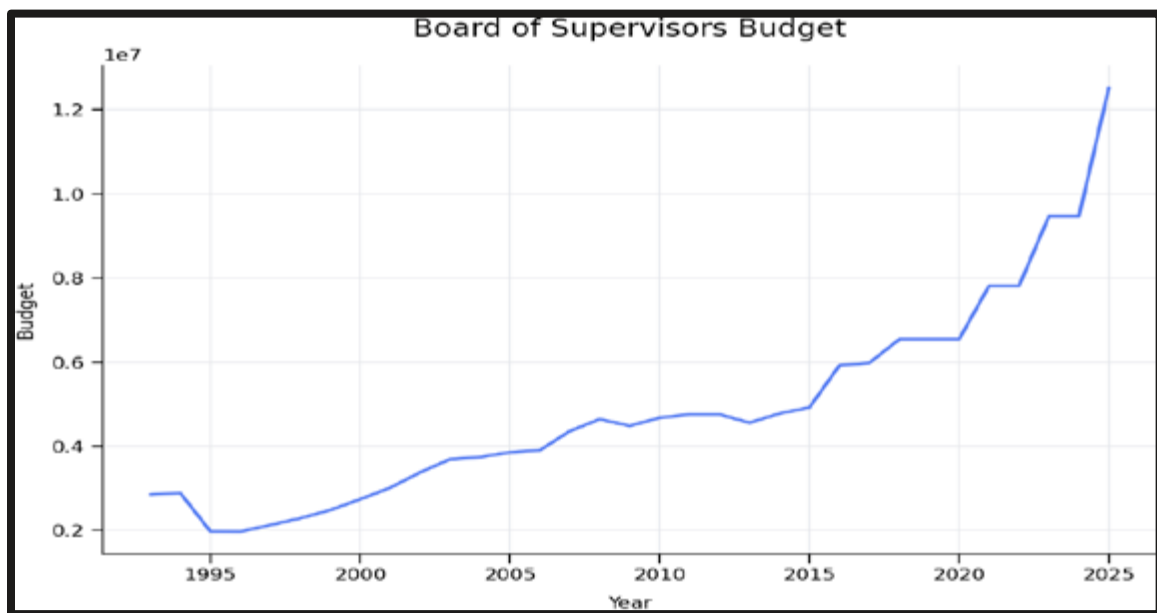


Figure 6 - Orange County Board of Supervisors' Budget Graph
Data source: Orange County Annual Budgets

While moderate budget increases over time are expected, growth at several times the rate of cumulative inflation raises concerns. Such increases may reflect internal

⁵ California Government Code Section 25303.

administrative expansion or rising discretionary spending rather than workload-driven operational needs.

Over the past decade, a sizable portion of the Board of Supervisors' budget has been devoted to salaries and discretionary spending, and these categories have expanded far faster than both inflation and overall County service demands. Salary costs have increased as district offices added policy aides, communications staff, and administrative personnel, resulting in a larger and more costly support structure. Discretionary⁶ spending has similarly grown, funding a wide range of district-level initiatives that often extend beyond the Board's core responsibilities.

For example, in 2025 the Board of Supervisors granted over \$4,000,000⁷ to different organizations within their respective districts. A substantial share of these discretionary expenditures was directed toward community-based grants awarded to individuals, nonprofits, and local organizations located within a supervisor's district, even when those recipients reside in incorporated cities and are already served by their own city councils. While many of these grants support worthwhile programs, the practice effectively allows Supervisors to allocate public funds to groups and constituencies outside the County's direct governance responsibilities. This practice can create the appearance that discretionary spending and grantmaking are being used to cultivate goodwill or curry political favor with residents, organizations, and voters who fall under municipal, not County, jurisdiction. Collectively, the growth in salaries, discretionary spending, and politically advantageous grantmaking underscores the extent to which the Board's budget has expanded beyond what is required to serve its shrinking unincorporated constituency.

When the Board's increased staffing and budget are compared with population trends in Orange County, the findings become clear. While Countywide population grew for part of this period, it has since stabilized, and the population directly governed by the Board steadily declined. No major shift in responsibilities appears to necessitate such notable budget expansion. Yet the Board's headcount has doubled, and its budget multiplied more than six-fold. The disconnect between population-based workload and headcount growth creates a misalignment that warrants scrutiny. Taken together, these trends demonstrate that the Board's budget expansion is not aligned with measurable changes in inflation, population, workload, or municipal governance responsibilities.

⁶ [District Discretionary Funds | Orange County](#)

⁷ [District Discretionary Funds | Orange County](#)

“There’s no area more in need of reform -- or more like termination -- than county supervisors discretionary spending, which was minimal for decades with traditional OC leaders having an aversion to what many call political slush funds.”⁸

⁸ [Santana: Orange County Supervisors Confront Themselves](#)

FINDINGS

In accordance with California Penal Code §933 and §933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency affected by the Findings presented in this section. Responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation “A Breach of Public Trust in Orange County” the 2025-2026 Orange County Grand Jury has arrived at six findings, as follows:

- F1** Headcount and discretionary spending over the recent budget years for the Board far exceeds inflation and outpaces the demographic changes that would typically justify increased staffing or budgets.
- F2** The Board’s municipal governance responsibilities have dwindled as the unincorporated population of Orange County shrank yet staffing and expenditures have increased.
- F3** Staffing expansions within Board offices are not tied to demonstrable needs.
- F4** The expansion of district-level discretionary spending, including grants to individuals and organizations located within incorporated cities, extends the Board’s influence into areas that fall under municipal responsibilities, not the County’s direct jurisdictional responsibilities.
- F5** The significant growth in Board office staffing has led to the appearance of an administrative structure that parallels work already performed by the County Executive Office and department heads.
- F6** The widening distance between Supervisors and the Executive Team undermines the value of the County Executive Team and complicates coordination, slows policy implementation, and contributes to fragmented decision-making.

RECOMMENDATIONS

In accordance with California Penal Code Sections 933 and 933.05 the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) Responses from each agency affected by the Recommendations presented in this section. Responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury makes the following seven recommendations:

- R1** Starting with the budget for Fiscal Year 2027-2028 (and ongoing), zero-based budgeting should be used by the Board to require justification for all Board of Supervisors departmental positions and expenditures. (F1, F2, F4, F5)
- R2** Starting with the budget for Fiscal Year 2027-2028 (and ongoing), an audit of municipal service workload in the unincorporated areas should be conducted to determine the appropriate level of Board staffing necessary to support the 4% of County residents still directly governed by the Board. (F1, F2, F3, F5)
- R3** Starting with the budget for Fiscal Year 2027-2028 (and ongoing), the Board's discretionary funds should be eliminated with the funds redirected to County public-facing services such as public safety, infrastructure, and health and human service programs. (F1, F4)
- R4** Starting October 31, 2026 (and ongoing), if discretionary funds are retained by the Board, the Board should limit discretionary grants to County-related purposes within its direct service and governance responsibilities and adopt uniform eligibility and reporting standards to ensure transparency and eliminate the appearance of political favoritism. (F1, F2, F4)
- R5** Starting October 31, 2026 (and ongoing), staffing levels within Board offices should be reviewed for redundancy relative to the County Executive Office and department-level subject-matter expertise. Positions that duplicate existing County functions should be eliminated. (F5)
- R6** Starting October 31, 2026, the Board should realign their engagement with the County Executive Team and department heads on policy matters to enhance collaboration. (F5, F6)
- R7** Starting with the budget for Fiscal Year 2027-2028, the Board should adopt a formal policy that governs their future departmental headcount and the elimination of discretionary spending that meets the above Recommendations. (F1, F2, F3, F4, F5, F6)

REQUIRED RESPONSES

California Penal Code Section 933 requires the governing body of any public agency which the Orange County Grand Jury has reviewed, and about which it has issued a final report, to comment to the Presiding Judge of the Superior Court on the findings and recommendations pertaining to matters under the control of the governing body. Such comment shall be made no later than 90 days after the Orange County Grand Jury publishes its report (filed with the Clerk of the Court). Additionally, in the case of a report containing findings and recommendations pertaining to a department or agency headed by an elected County official (e.g., District Attorney, Sheriff, etc.), such elected County official shall comment on the findings and recommendations pertaining to the matters under that elected official's control within 60 days to the Presiding Judge with an information copy sent to the Board of Supervisors.

Furthermore, California Penal Code Section 933.05 specifies the manner in which such comment(s) are to be made as follows:

- (a) As to each Grand Jury finding, the responding person or entity shall indicate one of the following:
 - (1) The respondent agrees with the finding.
 - (2) The respondent disagrees wholly or partially with the finding, in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons therefor.
- (b) As to each Grand Jury recommendation, the responding person or entity shall report one of the following actions:
 - (1) The recommendation has been implemented, with a summary regarding the implemented action.
 - (2) The recommendation has not yet been implemented, but will be implemented in the future, with a time frame for implementation.
 - (3) The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a time frame for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of the public agency when applicable. This time frame

shall not exceed six months from the date of publication of the Grand Jury report.

(4) The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation therefor.

(c) If a finding or recommendation of the Grand Jury addresses budgetary or personnel matters of a county agency or department headed by an elected officer, both the agency or department head and the Board of Supervisors shall respond if requested by the Grand Jury, but the response of the Board of Supervisors shall address only those budgetary /or personnel matters over which it has some decision-making authority. The response of the elected agency or department head shall address all aspects of the findings or recommendations affecting his or her agency or department.

The Orange County Grand Jury requires the following responses:

90 Day Response Required

Orange County Board of Supervisors Findings: F1, F2, F3, F4, F5, F6

Orange County Board of Supervisors Recommendations: R1, R2, R3, R4, R5, R6, R7

GLOSSARY AND ACRONYMS

Elected Officials	Elected officials are individuals who hold public office as a result of being chosen by voters in an election. They are entrusted with the responsibility to represent the interests of their constituents and to make decisions on public policy, laws, and governance. Examples include Board of Supervisors, Assessor, Auditor Controller, Clerk-Recorder, District Attorney, Sheriff/Coroner, Treasure Tax Collector.
Executive Team	Unelected Department Heads of the County of Orange including the Chief Executive Officer, Chief Financial Officer, Chief Human Resources Officer, Chief Information Officer, Chief Real Estate Officer, Chief Operating Officer, County Council, Internal Audit.
Grand Jury	A grand jury is a legal body empowered to investigate the operations of the various officers, departments, and agencies of local government, conduct official proceedings to investigate potential criminal conduct and determine whether criminal charges should be brought.
OC	Orange County
OCGJ	2025-2026 Orange County Grand Jury
Zero Based Budgeting	Zero-Based Budgeting (ZBB) is a budgeting method in which all expenses must be justified from scratch for each budget period, rather than relying on the previous year's budget as a baseline. Under ZBB, every program, position, and expenditure start at "zero" and must demonstrate its necessity, effectiveness, and alignment with organizational goals before funding is approved. This approach contrasts with incremental budgeting, where budgets are typically built by adjusting prior-year spending levels up or down.

BIBLIOGRAPHY

This report includes pertinent reference materials, such as letters, Board of Supervisors resolutions, audit reports, and excerpts from laws and regulations (especially applicable California Codes).

Center for Demographic Research. “Orange County Progress Report”. *Cal State Fullerton*, April 9, 2026. [products | CSUF - Center for Demographic Research](#)

CoinNews. “Inflation in Los Angeles, Long Beach and Anaheim Metropolitan Area”. *US Inflation Calculator*, Accessed May 15, 2026. [Inflation in Los Angeles, Long Beach and Anaheim | US Inflation Calculator](#)

County of Orange, California. “County of Orange Organizational Chart”. *OC Government*, July 12, 2024. [County of Orange JULY 2024 v3b.pdf](#)

Santana Jr., Norberto, “Orange County Supervisors Confront Themselves”, *Voice of OC*. April 2, 2026. [Santana: Orange County Supervisors Confront Themselves](#)

The OC. “Budget – FY 2025-2026”. *County of Orange Budget & Finance Office*, Accessed April 7, 2026. [Budget | Orange County Budget Office](#)

The OC. “District Discretionary Funds”. *County of Orange*, Accessed April 7, 2026. [District Discretionary Funds | Orange County](#)

The OC. “Homepage”. *Board of Supervisors County of Orange*, Accessed April 7, 2026. [Homepage | Orange County Board of Supervisors](#)

United States Department of Labor. “Economic News Releases”. *U.S. Bureau of Labor Statistics*, Accessed April 7, 2026. [Economic News Releases : U.S. Bureau of Labor Statistics](#)

APPENDIX A⁹

Fiscal Year	District 1		District 2		District 3		District 4		District 5		General		All Districts			Population		
	Budget	# of Empl	Budget	# of Empl	Budget	# of Empl	Budget	# of Empl	Budget	# of Empl	Budget	# of Empl	Total Budget	% Inc or Dec	Total Empl	OC Population	Unincorp Pop	Incorp Cities
1950																		14
1960																		22
1970																1,420,386	170,618	24
1980																1,932,709	267,325	25
1990																2,410,556	227,425	28
1993	528,321	9	516,067	8	537,090	10	593,024	9	606,555	8	70,355	1	2,851,412		44	2,532,639		30
1994	549,000	8	538,863	8	537,090	9	573,538	9	613,686	8	73,921	1	2,886,098	1.22	42	2,566,599		30
1995	391,102	6	395,000	6	387,000	8	405,206	7	397,000	6			1,975,308	(31.56)	33	2,603,678		30
1996	390,000	6	395,000	6	393,558	7	397,000	7	395,171	6			1,970,729	(0.23)	32	2,643,996		30
1997	428,000	6	421,841	6	419,357	7	434,124	7	420,857	6			2,124,179	7.79	32	2,709,277		30
1998	449,137	7	449,383	7	446,985	7	473,297	7	466,315	7			2,285,117	7.58	35	2,773,187		30
1999	486,447	7	495,455	8	495,000	7	490,290	7	513,055	9			2,480,247	8.54	38	2,815,933		32
2000	568,974	7	537,002	7	537,000	7	535,321	7	559,241	9			2,737,538	10.37	37	2,854,513	105,079	33
2001	631,696	7	582,291	7	590,100	7	610,884	7	594,727	9			3,009,698	9.94	37	2,885,457		34
2002	678,983	7	673,087	7	673,334	7	679,079	7	670,794	8			3,375,277	12.15	36	2,908,245		34
2003	744,899	7	737,698	7	727,789	7	734,787	7	744,668	8			3,689,841	9.32	36	2,929,376		34
2004	760,709	7	752,738	7	727,789	7	734,787	7	764,920	8			3,740,943	1.38	36	2,941,711		34
2005	787,924	8	776,420	7	746,293	7	753,291	7	789,496	8			3,853,424	3.01	37	2,940,055		34
2006	809,085	8	741,899	7	772,371	7	768,252	7	811,064	8			3,902,671	1.28	37	2,932,261		34
2007	874,527	8	871,516	7	880,581	7	853,847	7	878,320	8			4,358,791	11.69	37	2,931,629		34
2008	951,148	8	912,384	7	950,107	7	893,373	7	934,032	8			4,641,044	6.48	37	2,957,593		34
2009	941,750	8	902,986	7	844,990	7	883,975	7	910,624	8			4,484,325	(3.38)	37	2,987,177		34
2010	984,538	8	939,649	7	880,293	7	921,579	7	948,238	8			4,674,297	4.24	37	3,016,376	120,189	34
2011	984,538	8	939,649	7	898,803	7	984,538	7	947,893	8			4,755,421	1.74	37	3,037,811	122,276	34
2012	984,538	8	939,649	7	898,803	7	984,538	7	947,893	8			4,755,421	-	37	3,073,792	121,271	34
2013	935,311	8	892,667	7	894,587	8	935,311	8	900,498	8			4,558,374	(4.14)	39	3,105,236	122,435	34
2014	955,000	8	955,000	7	955,000	8	955,000	8	955,000	8			4,775,000	4.75	39	3,125,985	123,418	34
2015	983,650	8	983,650	8	983,650	8	983,650	8	983,650	8			4,918,250	3.00	40	3,148,491	125,969	34
2016	1,183,818	10	1,183,818	10	1,183,818	10	1,183,818	10	1,183,818	10			5,919,090	20.35	50	3,165,028	127,681	34
2017	1,195,656	10	1,195,656	10	1,195,656	10	1,195,656	10	1,195,656	10			5,978,280	1.00	50	3,185,541	128,573	34
2018	1,308,283	10	1,308,283	10	1,308,283	10	1,308,283	10	1,308,283	10			6,541,415	9.42	50	3,192,479	131,269	34
2019	1,308,283	10	1,308,283	10	1,308,283	10	1,308,283	10	1,308,283	10			6,541,415	-	50	3,192,408	131,992	34
2020	1,308,283	10	1,308,283	10	1,308,283	10	1,308,283	10	1,308,283	10			6,541,415	-	50	3,188,326	132,548	34
2021	1,562,906	10	1,562,906	10	1,562,906	10	1,562,906	10	1,562,906	10			7,814,530	19.46	50	3,174,592	133,303	34
2022	1,562,906	10	1,562,906	10	1,562,906	10	1,562,906	10	1,562,906	10			7,814,530	-	50	3,159,797	132,214	34
2023	1,893,971	12	1,893,971	12	1,893,971	12	1,893,971	12	1,893,971	12			9,469,855	21.18	60	3,156,200	131,182	34
2024	1,893,971	12	1,893,971	12	1,893,971	12	1,893,971	12	1,893,971	12			9,469,855	-	60	3,170,070	132,323	34
2025	2,504,971	12	2,504,971	12	2,504,971	12	2,504,971	12	2,504,971	12			12,524,855	32.26	60	3,175,427	133,033	34

⁹ Data source: Summary of County Budget Documents [Budget Archive](#) | [Orange County Budget Office](#)

APPENDIX C

The Board of Supervisors is the governing body of the County. The Supervisors are elected from one out of the five Supervisorial Districts in the County and serve both legislative and executive roles. In their legislative roles, the Supervisors pass all ordinances and resolutions governing the County. In their executive role, the Supervisors oversee County government and are responsible for seeing that functions delegated to the County are properly discharged.

The Board of Supervisors establishes policy; approves the annual budget; appoints a County Executive Officer, County Counsel, Clerk of the Board, Internal Auditor, Public Defender and Public Guardian; approves contracts for projects and services; conducts public hearings on land-use and other matters; and makes appointments to boards, committees and commissions.¹¹

¹¹ [Homepage | Orange County Board of Supervisors](#)



Unbalanced Authority: Oversight and Accountability in Orange County Government



Orange County Grand Jury 2025-2026

TABLE OF CONTENTS

SUMMARY	4
BACKGROUND	6
REASON FOR STUDY	8
Chronology Of Orange County Public Officials’ Misconduct and/or Controversy	9
METHOD OF STUDY	10
INVESTIGATION AND ANALYSIS.....	11
Comparative Chart: Digital Public Service Capabilities in Peer Counties	14
CONCLUSION	29
FINDINGS.....	30
RECOMMENDATIONS.....	31
REQUIRED RESPONSES	32
ACRONYMS and TERMS.....	35
BIBLIOGRAPHY	36
APPENDIX A.....	39
APPENDIX B.....	40
APPENDIX C	41
APPENDIX D	42
APPENDIX E.....	50
APPENDIX F.....	53
APPENDIX G	59

SUMMARY

The Grand Jury reviewed the County of Orange's (County) governance framework and found that deeply embedded structural constraints in the California Constitution and State Law restrict the Orange County Board of Supervisors' (Board) ability to hold elected officials accountable. Lacking the authority to remove or meaningfully sanction officials, even in the face of serious violations uncovered through internal investigations, the Board is rendered powerless.

This vacuum creates an environment where misconduct and mismanagement can persist unchecked, erodes public trust, and compromises the integrity of County administration. The Grand Jury's concerns are illustrated through investigations into two elected County offices: the County of Orange Assessor (Assessor) and the County of Orange Treasurer-Tax Collector (Treasurer).

The Board lacks authority to impose corrective action or remove an elected official from office, even when workplace misconduct or managerial instability is substantiated.

The Grand Jury's investigation identified a sustained pattern of unprofessional and irregular conduct by the Assessor, raising significant concerns regarding the effective administration of the office. The County Human Resource Services department (County HR) previously substantiated findings that the Assessor violated established workplace anti-harassment policies and recommended corrective training. Notwithstanding these findings and corrective measures, the conduct has reportedly persisted.

Testimony obtained during the investigation consistently characterized the office as lacking in stable executive leadership. Witness accounts describing inconsistent decision-making and repeated lapses in judgment raise doubts about the Assessor's ability to manage the operational and administrative responsibilities of a complex public agency. These concerns are further compounded by the Assessor's limited physical presence in the office and a tendency to often focus on nonessential or unconventional matters while at work. These reported observations call into question the Assessor's executive effectiveness and administrative competence.

The Assessor's longstanding resistance to modernization left the department technologically stagnant for nearly a decade. A previous 2023-2024 Grand Jury report documented persistent inefficiencies stemming from outdated manual processes and a reluctance to adopt centralized technology systems. These limitations hindered public

access to essential services and left the County significantly behind its peers.¹ Despite improvements in 2024, Orange County still delivers only basic online services that trail behind peer counties.

The Grand Jury's investigation into the Treasurer's office uncovered pervasive executive dysfunction, workplace misconduct, and administrative failure so severe that the Board, in December 2025, took the extraordinary step of divesting the Treasurer of her delegated investment authority effective for 2026.²

The Board noted that although the Orange County Treasury Pool (County investment pool)³ had not yet incurred financial losses, the Treasurer's documented misconduct created significant fiduciary risk. It found that the hostile work environment, staffing instability, and failure to meet statutory duties threatened the proper management and stability of the investment pool. As a result, the Board characterized its action as a preventative measure to protect the pool from potential mismanagement, operational disruption, and a loss of public confidence.⁴

The Board has no authority to intervene, correct, or discipline an elected official under state law. This could allow ethical lapses, mismanagement practices, and questionable actions to occur with impunity. It highlights a gap in accountability and underscores the need for reform to ensure that the County and the public are protected from the consequences of unchecked executive authority.

Highlighting a lack of effective oversight, Supervisors often learned of misconduct or mismanagement only through media reports.⁵ The Grand Jury recommends expanding audit measures to step-up performance reviews of elected officials. This would allow problems to be identified early, ensuring transparent corrective action, and preventing issues from escalating into costly public failures.

¹ Superior Court of California, County of Orange, OC Grand Jury, [2023-2024 Reports \(in order of release\)](#) | [Orange County Grand Jury](#) Review of the Assessor's Office 06/14/24

² Orange County Board of Supervisors Signed Minute Order: December 16, 2025 Item 13. Treasurer-Tax Collector - Deleted [Adopt resolution approving 2026 Statement of Investment Policy and](#) delegating investment authority to Treasurer-Tax Collector

³ Orange County Treasury Pool (OCTP). Government Code Sections 53600 et seq., 53630 et seq. and 2700.3 guide the investment requirements of the OCTP.

⁴ Orange County Board of Supervisors Meeting of 02/25/2025 Item S36C.
[https://ocgov.granicus.com/player/clip/5376?view_id=20&redirect=true#:~:text=S36C.%20County%20Counsel%C2%A0%2D%20Consider%20second%20reading%20and%20adoption%20of%20%E2%80%9CA%20Ordinance%20of%20the%20County%20of%20Orange%2C%20California%20Amending%20Section%201%2D2%2D320%2C%20Subsection%20\(d\)%20of%20the%20Codified%20Ordinances%20of%20the%20County%20of%20Orange%20Regarding%20Investment%20Authority%E2%80%9D%20%2D](https://ocgov.granicus.com/player/clip/5376?view_id=20&redirect=true#:~:text=S36C.%20County%20Counsel%C2%A0%2D%20Consider%20second%20reading%20and%20adoption%20of%20%E2%80%9CA%20Ordinance%20of%20the%20County%20of%20Orange%2C%20California%20Amending%20Section%201%2D2%2D320%2C%20Subsection%20(d)%20of%20the%20Codified%20Ordinances%20of%20the%20County%20of%20Orange%20Regarding%20Investment%20Authority%E2%80%9D%20%2D)

⁵ Elattar, Hosam. Voice of OC Feb. 26, 2025.

To strengthen accountability across elected offices, the Grand Jury recommends considering County charter reforms proven in other jurisdictions:

- Ability to remove an official from office for misconduct
- Shifting some elected offices to appointed positions
- Consolidating County departments to enhance oversight and improve performance.

This report suggests charter reforms designed to safeguard the County from public officials' misconduct or mismanagement. It further calls on the Board to implement more rigorous performance reviews for elected leaders. Without these measures, the County remains vulnerable to recurring misconduct, administrative failures and crisis management. With reform, the County can establish a system of checks and balances that holds independently elected officials more accountable.

The Grand Jury also urges both the media and the voting public to more thoroughly examine the conduct, professionalism and ethical fitness of candidates seeking public office. Stronger public scrutiny and informed participation are essential to improving the quality of leadership in Orange County and reducing the significant financial and operational costs associated with misconduct, legal settlements and organizational instability. Through vigilant oversight and engaged civic participation, the community can help ensure that its leaders uphold the standards of integrity and accountability necessary for effective governance.

BACKGROUND

Orange County's government is structured so that the Board sets policy, approves budgets, and provides general oversight of County operations. However, when it comes to independently elected officials, the Board's authority is sharply limited. State law and the California Constitution provide the Board with little power beyond ensuring that elected officials perform their basic statutory duties.

Two offices illustrate the consequences of this structure:

- The County Assessor, elected every four years, manages the valuation of more than \$850 billion⁶ in taxable property with a staff of roughly 250 employees.

⁶ Orange County Assessor Claude Parrish has delivered the 2025-26 Local Assessment Roll of Values that includes all locally assessable property in Orange County. The total net value on the Roll is over \$850.1 billion. The Roll of Values is up 5.07% or \$41.06 billion more than last year (FY 2024-25). [Press Release 2025-070125.pdf](#)

- The County Treasurer-Tax Collector, elected every four years, oversees tax collection and treasury functions with approximately 70 employees. Until late 2024, the office was delegated authority to manage a \$17 billion investment pool, a responsibility the Board has not delegated to Treasurer in 2025 or 2026.⁷

Under Article XI of the California Constitution and Government Code §24009,⁸ these officials are accountable to voters, not to the Board. Courts have repeatedly affirmed that while the Board may supervise generally, it cannot direct how elected officials carry out their duties nor can it intervene in their day-to-day operations.⁹ The California State Association of Counties reinforces this distinction in its official “Role of Counties” guidance, by stating that the County Board of Supervisors “supervise County officers to ensure they fulfill their duties but cannot modify or relieve them of their legal responsibilities.”¹⁰

This autonomy became especially visible in recent years. In 2023, an external investigation commissioned by County Human Resources (County HR)¹¹ substantiated misconduct by the Assessor. A year earlier, a separate HR investigation found the Treasurer had engaged in workplace misconduct, including creating a hostile environment¹². Although the Board was formally notified, the public, and in some cases even individual Supervisors, did not learn the full details until media outlets obtained the reports through public records requests.¹³

These episodes underscore a structural reality: even when serious misconduct is documented, the Board has no substantive authority to take corrective action, discipline an elected official, or remove them from office. Without meaningful measures for intervention, problems can persist unchecked, leaving the County vulnerable to operational failures, ethical breaches, and the erosion of public trust. This governance framework forms the backdrop for the Grand Jury’s examination of the structural

⁷ Orange County Board of Supervisors Signed Minute Order: December 16, 2025, Item 13. Treasurer-Tax Collector - Deleted [Adopt resolution approving 2026 Statement of Investment Policy and](#) delegating investment authority to Treasurer-Tax Collector

⁸ See Appendix A: California Constitution Article XI and Government Code §24009

⁹ See Appendix A: California Constitution Article XI and Government Code §24009

¹⁰ See Appendix B: The California State Association of Counties

¹¹ Burke, Williams & Sorensen, LLP: Confidential Investigation Report, Prepared for the County of Orange, May 16, 2023 https://s3.documentcloud.org/documents/25563834/workplace-misconduct-investigation-report-regarding-oc-assessor-claude-parrish.pdf?_gl=1*12m5v6a*_gcl_au*ODU1NzA3NDg5LjE3NzQ0NjA0NDk_

¹² Brown, Janice P. and PeBenito, Angelica M. *Confidential Investigation Report Sheri Friedenrich Key-Throwing Investigation Report released by County of Orange April 29, 2022.*

¹³ Farzan, Yusra and Gerda, Nick. LAist March 19, 2025. *OC Investigation found elected Assessor Treated Womer as Subservient, Harassed Employees Over Her Disability.*

imbalance between the impunity of independently elected offices and the Board's constrained capacity for oversight.

REASON FOR STUDY

"The government you elect is the government you deserve."

Thomas Jefferson

Scandal, investigation, or criminal conviction have touched major offices in Orange County over the past five decades. The breadth of misconduct from bribery to fiscal mismanagement to federal corruption underscores a structural weakness that transcends ideology, personality, and political moment.

What follows is not merely a recounting of past controversies, but an examination of a governance model that has repeatedly failed to protect the public from the predictable risks of concentrated power.¹⁴

Thomas Jefferson once quipped, "The government you elect is the government you deserve." This resonates with force when viewed through the lens of Orange County's political history. For more than fifty years, the County's own public records reveal not a series of isolated lapses, but a persistent cycle of ethical breaches and criminal convictions that resurface across eras, offices, and party lines. What emerges is a pattern so consistent that it reads less like coincidence and more like a structural flaw.

Taken together, these episodes form a collection of political missteps that amount to a documented pattern of governance failure. Orange County's history shows that unethical behavior and corruption are neither rare nor random, but cyclical. Each decade brings a new set of names, but the underlying dynamics remain stubbornly the same. This is the context in which Jefferson's warning lands with weight.

When institutions lack durable safeguards, the electorate suffers the consequences. Government integrity cannot depend on the character of individual elected officials alone. It requires systematic guardrails, meaningful checks and balances, independent oversight bodies with real authority, institutional transparency, financial controls, enforceable ethics standards, and active citizen engagement through the ballot box.

The following chart traces this pattern over time, illustrating how the lack of durable institutional safeguards has repeatedly shaped local governance.

¹⁴ See Table 1. Chronology of Orange County Public Officials' Misconduct and/or Controversy, page 8

Chronology Of Orange County Public Officials' Misconduct and/or Controversy

Name	Position	Tenure	Misconduct-Controversy
Andrew Do	OC Supervisor	2015-2024	Pled guilty to conspiracy to commit bribery; directed \$13 million to nonprofits tied to his family. Currently serving five-year sentence. Board censured Supervisor prior to court case.
Claude Parrish	OC Assessor	2015-present	2023 County investigation substantiated EEO harassment and retaliation violations. County HR issued cease and desist order and recommended HR/EEO training.
Shari Freidenrich	OC Treasurer-Tax Collector	2011-present	In 2024, Board discontinued the investment authority of Treasurer because of management concerns. 2022 County commissioned investigation substantiated EEO harassment and retaliation violations. County HR issued cease and desist order and recommended HR/EEO training.
Todd Spitzer	OC District Attorney	2019-present	Civil suit over mishandling harassment and retaliation complaints. Lost litigation in 2025. County current and future legal costs estimated at over \$18 million.
Tony Rackaukas	OC District Attorney	1999-2019	Criticized for jailhouse informant scandal and alleged evidence fabrication.
Eric Woolery	OC Auditor-Controller	2015-2019	Accused of misusing staff for personal errands; Privately took up residency in another state while continuing as OC Auditor-Controller. Died unexpectedly while out of state which revealed his change in residency.
Webster Guillory	OC Assessor	1998-2014	Convicted of filing false nomination papers for re-election.
Carlos Bustamante	Santa Ana Councilman; OC Public Works Executive	2004-2012	Convicted of attempted sexual battery, stalking, and theft of public funds. Served jail time.
John Williams	OC Public Administrator / Guardian	2003-2012	Public Administrator's office was consolidated with the OC District Attorney's office shortly after Williams resigned, amidst allegations of mismanagement and pension spiking.
Chriss Street	OC Treasurer-Tax Collector	2007-2011	Board strips Treasurer of investment authority after reports of fiduciary misconduct tied to his actions before taking office.
Mike Carona	OC Sheriff-Coroner	1999-2008	Convicted of witness tampering in federal corruption probe. Sentenced to prison time.
Don Roth	OC Supervisor	1987-1993	Pled guilty to seven misdemeanor conflict-of-interest charges for failing to report gifts and then voting on matters that benefitted the gift givers.
Robert L. Citron	OC Treasurer-Tax Collector	1970-1994	Catalyst for \$2 billion bankruptcy via risky investments; pled guilty to six felonies. Served jail time.
Phillip Anthony	OC Supervisor OC Water District	1976-1980; 1981-2018	Pled no contest to campaign finance violations; indicted for laundering campaign funds.
Ralph Diedrich	OC Supervisor	1972-1979	Convicted of bribery and conspiracy related to land development in Anaheim Hills. Served jail time.
Andrew J. Hinshaw	OC Assessor U.S. Congressman	1965-1972; 1973-1977	In 1977 was convicted of accepting bribes from the Tandy Corporation in his previous job as OC Assessor as well as using County staff and supplies for his 1972 campaign for Congress. Served eight months in prison.
Bob Battin	OC Supervisor	1969-1977	Convicted of misusing public funds for campaign; fined and served minor jail time.

Perhaps most telling is the span of offices touched by scandal. Nearly every major County office has faced serious allegations or criminal convictions at some point in the past half-century. This is a structural vulnerability, and the record clearly shows it has been demonstrated again and again.

From the bribery convictions of Supervisors Ralph Diedrich and Bob Battin in the 1970s, to Treasurer Robert Citron's disastrous investment schemes that triggered the 1994 bankruptcy, to the federal corruption case that brought down Sheriff Mike Carona, to the 2024 guilty plea and conspiracy conviction of Supervisor Andrew Do and the recent investigations of County officials, the storyline repeats with unsettling regularity. The office holder changes, the decade changes, the specific misconduct changes but the underlying dynamic does not. Concentrated authority, when left without durable safeguards, invites abuse.

During their terms in office, both the Assessor and the Treasurer have themselves become part of the broader historical pattern. Reports of internal investigations, substantiated violations of employee abuse, and the revocation of certain fiscal authority of the Treasurer underscore the vulnerabilities in these offices. Their inclusion in the chronology reinforces the central lesson of the last fifty years: no office is immune, no era is exempt, and structural safeguards must be strengthened not after a scandal, but beforehand.

METHOD OF STUDY

The Grand Jury reviewed information and data from the following sources:

- Investigative reports commissioned by the County
- Public statements, press reports, and records released via public records request (media disclosures)
- County policies and procedures on harassment, disability, discrimination, retaliation, workplace violence and employee training
- Record requests from the Assessor's and Treasurer's offices
- Relevant state statutory and regulatory requirements governing elected county officers and oversight authority of the Board of Supervisors
- Interviews with multiple County witnesses across various departments
- County personnel and administrative data
- Internet websites including County departments, public court records, professional associations, multiple news agencies, local press, on-line publications/articles, County documents/records
- Department tours.

- California Penal Codes.
- Attended public meetings.
- On-line recorded public meetings.

INVESTIGATION AND ANALYSIS

Ensuring the safe and responsible management of public funds is one of the most fundamental obligations of county government.

Two of the most financially significant elected offices in the County are the offices of the Assessor and the Treasurer. These offices collectively oversee the valuation of taxable property and the management of billions of dollars in public assets. As a result, any deficiencies in leadership, accountability, or operational integrity carry substantial implications for residents, public agencies, and the County's long-term financial position. Given the magnitude of their responsibilities, the Grand Jury undertook a review of both offices to independently assess their operations and methods of performing their duties in light of the standards of professionalism, competence, and public trust required of positions with such far-reaching impact.

THE ORANGE COUNTY ASSESSOR

Harassment and Retaliation in the Workplace

The Assessor's office administers one of the most significant responsibilities in County government. It oversees the appraisal valuation of more than three-quarters of a trillion dollars in taxable property, forming the financial foundation for public services throughout Orange County¹⁵. Consequently, the professionalism, and executive leadership of the Assessor are essential to maintaining public confidence in the integrity and competence of this elected office.

A 2023 Equal Employment Opportunity investigation commissioned by County HR found multiple instances of misconduct by the Assessor¹⁶. In response, the County issued a formal cease and desist order and recommended that the Assessor complete harassment-prevention training. The seriousness of the findings was made clear in the County's written notice:

¹⁵ Orange County's Assessor's Webpage, Mission Statement, [Department Overview | Orange County Assessor Department](#)

¹⁶ Burke, Williams & Sorensen, LLP: Confidential Investigation Report, Prepared for the County of Orange, May 16, 2023 https://s3.documentcloud.org/documents/25563834/workplace-misconduct-investigation-report-regarding-oc-assessor-claude-parrish.pdf?_gl=1*12m5v6a*_gcl_au*ODU1NzA3NDg5LjE3NzQ0NjA0NDk_

“As an elected County Department Head, you are tasked with ensuring a safe and healthy working environment which is free from discrimination, harassment, retaliation, and abusive conduct (AKA bullying) for the employees assigned to your office. The County’s Equal Employment Opportunity Policy (“EEO”) applies to all County employees and officials and states that ‘... the County is committed to ensuring that no employee is subjected to unlawful discrimination, harassment, retaliation, or abusive conduct.’ As you know, you were the subject of an independent investigation into claims that you violated this policy.

“To ensure fairness and to avoid an actual or perceived conflict of interest, the County retained the services of Burke, Williams & Sorenson, LLP law firm (‘the investigator’). Their investigation has resulted in both sustained and unfounded findings of fact and violations of policy. The investigator’s findings raise serious concerns about your treatment of Assessor employees. There were thirteen complaints against you; six of which were wholly or partially sustained and in violation of the County’s EEO policy. These include sustained findings of harassment and/or retaliation based on disability, sex or gender, and race. Allegations of abusive conduct, not based on a protected class, were also sustained.

“As the County’s Chief Human Resources Officer, I am obligated to instruct you to cease and desist from any and all conduct that violates County policy... As an elected Department Head, it is your duty to provide a safe, healthy, and positive working environment for the County’s employees assigned to you. To that end, I strongly recommend that you read the attached EEO and Anti-Harassment Policy and complete the following two-hour Workplace Harassment Prevention Training for Supervisors via Skillsoft using the attached instructions.”¹⁷

In summary, the substantiated complaints demonstrate a failure to meet the minimum standards of workplace conduct expected of an elected department head. The Grand Jury’s investigation revealed that the Assessor’s conduct remains problematic.

Deficiencies in Leadership, Professional Conduct, and Office Management

During this investigation, the Grand Jury conducted interviews with witnesses, reviewed relevant records and internal communications, and examined publicly available information regarding the administration and leadership of the Assessor. The evidence gathered revealed issues regarding the Assessor’s professional conduct.

¹⁷ See Appendix C: 12/21/2023 letter to: Claude Parrish, from: Colette Farnes, re: cease and desist workplace harassment and recommended EEO training

Multiple witnesses reported instances in which the Assessor displayed anger and frustration toward subordinates when they did not carry out directives exactly as instructed. The investigation also found that the Assessor's attention was frequently focused on non-essential office matters. Witnesses commented on the Assessor's inconsistent decision-making and difficulty in retaining key information. Witness testimonies conveyed that these behavior patterns point to performance-related challenges that affect the Assessor's executive functioning within the office.

The Grand Jury was made aware of an open secret within the department: the Assessor's limited presence in the office. Multiple witnesses consistently described a routine in which the Assessor arrives around 3:30 p.m. While elected officials are not bound to rigid hourly schedules, a reasonable argument can be made that effective leadership of an organization requires sustained executive involvement, accessibility to staff, and regular attention to administrative matters in the workplace.

Public administration best practices¹⁸ emphasize that the chief executive of a complex public office must provide visible leadership, accountability, and a consistent presence to guide professional staff and maintain operational excellence. This expectation is reinforced by federal governance standards, as the U.S. Government Accountability Office (GAO) mandates that effective internal control systems depend on leadership that establishes accountability, monitors performance, and maintains an active presence sufficient to ensure operational integrity.¹⁹ Against these established standards, prolonged executive absence or minimal workplace presence is not a benign management style; it is a material failure of duty.

The Assessor's overall demeanor raises substantial concerns regarding accountability and adherence to expected performance standards. Based on these findings, the Grand Jury believes the Assessor's behavior is not merely a matter of personal style or temperament. Rather, it reflects conduct that falls short of the professionalism required of an executive to effectively administer a critical public function.

Resistance to Implementing Technology

Over the past decade, the County has steadily modernized its internal operations, investing in cloud-based platforms, digital workflows, and public online services.²⁰

¹⁸ International City/County Management Association (ICMA) — Practices for Effective Local Government Management and Leadership [Leading By Example: Building an Ethical Culture from the Top Down](https://www.icma.org/Leading-By-Example-Building-an-Ethical-Culture-from-the-Top-Down) | [icma.org](https://www.icma.org)

¹⁹ U.S. Government Accountability Office, Standards for Internal Control in the Federal Government (GAO-14-704G), Green Book Standards for Internal Control in the Federal Government <https://www.gao.gov/search?keyword=effective+internal+controls>

²⁰ Superior Court of California, County of Orange, OC Grand Jury, [2023-2024 Reports \(in order of release\)](#) | [Orange County Grand Jury Review of the Assessor's Office](#). 06/14/24

These improvements aligned with a broader regional shift toward technology-driven government; one that featured faster service delivery, greater transparency, and improved access for residents and businesses. While most County departments embraced this transformation, the Assessor's office remained largely disengaged.

As neighboring jurisdictions digitized parcel systems, automated routine processes, and expanded online self-service tools, the Assessor continued to rely on aging software and manual workflows. The Assessor repeatedly declined to participate in the countywide program of upgrading services. Over time, limited modernization efforts left Orange County behind comparable jurisdictions in providing efficient and accessible public services.

The 2023-2024 Grand Jury first raised the same concerns. Only after the Grand Jury's report publicly documented these deficiencies did the Assessor implement a series of basic upgrades: primarily the introduction of online public information, computers and e-mail for all staff, and cybersecurity enhancements.

Assessor's Office Lags Behind Peer Counties

Below is a comparison of digital public service capabilities across peer counties which highlights the extent of the Assessor's Office's lag in modernization.

Comparative Chart: Digital Public Service Capabilities in Peer Counties²¹

Service Category	Orange County	Los Angeles County	San Diego County
Online Form Submission (E-Filing + E-Signature)	Limited; requires printing and manual signature	Available for multiple forms	Partial
Property Search Tools	Basic lookup only	Advanced portal (parcel, legal, map)	Moderate tools
GIS/Interactive Parcel Maps	Limited	Available	Available
Records Integration (Ownership/Grantor-Grantee)	Available but fragmented	Integrated	Integrated
Property Fraud Alert System	Limited/indirect	Email alert system	Owner Alert system
Cross-Department Integration	Fragmented	Partial	Strong
User Self-Serve Capability	Limited-Moderate	High	High

²¹ <https://www.ocassessor.gov>.
<https://www.sdardd.gov/content/arcc/home/division/assessor.html>

Overall Assessment

Table 2 shows that Orange County provides some basic appraisal online services but has not shifted to a fully digital service model that enables the public to complete transactions without jumping between disconnected websites, forms, departments, or manual steps. It instead relies on a hybrid approach that digitizes forms without enabling complete end-to-end transactions or integrated access.

Peer counties, by contrast, have embraced digital-first service delivery that prioritizes public accessibility, transparency, and automation. Their systems allow residents and businesses to complete end-to-end transactions online, access integrated datasets, and interact with government services through modern platforms. Orange County's inability to keep up with the times has left the Assessor's office behind its regional peers and has hindered the County's ability to more efficiently and effectively serve taxpayers.

Accountability Measures Warranted

The Grand Jury investigation of the Assessor reflects a sustained pattern of executive absenteeism, unorthodox methods, irregular conduct, and lack of modernization. The office requires consistent leadership and sound judgment. These standards cannot be met when basic managerial responsibilities are overlooked.

The Board has an obligation to pursue the legal and administrative steps necessary to ensure that elected offices are led by competent and accountable executives who implement methods and systems to adequately perform their duties and meet the appropriate policies and standards of the County. This responsibility extends not only to safeguarding the accuracy and reliability of the County's holdings, but also to protecting the well-being of employees who depend on stable, competent, and accessible leadership. Most importantly, the Board must be positioned to hold elected officials accountable for fulfilling the constitutional duties of their office on behalf of the residents of Orange County.

THE ORANGE COUNTY TREASURER

Issues in the Treasurer's Office

An internal County document was provided to the Board and subsequently published by a media outlet, detailing significant concerns regarding the Treasurer's operations, decision-making practices, and fiscal management. The document described a persistent pattern of delays, organizational dysfunction, and disregard for basic standards of fiscal responsibility and operational efficiency. According to the document,

these failures produced measurable financial losses across County departments and public institutions.²²

The document alleged multiple instances in which the Treasurer's direct interference in contract negotiations resulted in economic loss to the County. It alleges several cases of poor communication, staff attrition, and inconsistent direction. It alleges that delays in depositing taxpayer's checks reduced investment earnings and triggered avoidable penalties. In one case, a \$550,000 refund owed to school districts was withheld for three years. Additionally, the treasurer delayed approval to close \$3 million in school bond funds for nearly a decade causing the funds to be unavailable to the schools.²³

The document also alleged the Treasurer declined to use standard enforcement tools available that help staff collect property tax revenue resulting in an estimated \$9 million loss in revenue in 2023-24 and 2024-25 respectively. Tax liens were filed months late in these years, because the Treasurer cited concerns about specific taxpayers, raising questions about preferential treatment. These delays also disrupted the State Intercept Program²⁴, hindering revenue recovery.

The document alleged additional risks within investment operations. The Treasurer directed staff to invest exclusively in certain money market funds regardless of yield, undermining the County's ability to maximize returns. It is also alleged that the Treasurer violated basic internal-control principles by assigning conflicting duties to investment staff and discontinuing key oversight practices, including daily monitoring of reports and interdepartmental coordination meetings.²⁵

The Grand Jury learned through interviews that the Treasurer obstructed oversight functions by insisting on personally approving every audit item from a performance audit, slowing audit completion and increasing external costs. Interference in routine human-resources processes contributed to high staff turnover, and increased recruitment expenses. Internally, inefficient practices, such as requiring staff to print emails for the Treasurer's review, wasted time and resources, while numerous workplace complaints signaled a deteriorating organizational environment, and a toxic work environment.

²² Elattar, Hosam. Voice of OC Feb. 26, 2025. *OC Supervisors Break Silence: Publicly Blast Treasurer's Alleged Workplace Hostility*.

²³ Elattar, Hosam. Voice of OC Feb. 26, 2025. *OC Supervisors Break Silence: Publicly Blast Treasurer's Alleged Workplace Hostility*.

²⁴ State of California Franchise Tax Board <https://www.ftb.ca.gov/pay/collections/interagency-intercept/index.html>

²⁵ See Appendix D. Fact Sheet: *Board of Supervisors Fact Sheet on TTC*, February 24, 2025.

Collectively, these issues reflect a pattern of managerial instability and operational disregard that has a potential to expose the County to financial loss, weakened internal controls, and impaired essential public-facing functions.

Dysfunctional Environment in the Treasurer's Office

The Grand Jury reviewed the circumstances surrounding the Board of Supervisors' 2024 decision to discontinue the Treasurer's delegated investment authority. News accounts detailed internal conditions within the Treasurer's office and described Board concerns regarding the Treasurer managing \$17 billion in public funds.²⁶ During the Grand Jury investigation, information obtained from interviews corroborated the conditions and concerns reported in the media, providing independent validation of the issues raised publicly.

The workplace environment and leadership practices were a significant concern to the Board. Concerns were voiced describing a work environment characterized by elevated tension, mistrust, and demeaning interactions. These accounts aligned with findings from a 2022 County-commissioned investigation,²⁷ which documented incidents including conduct assessed as a violation of workplace violence policy and other behavior perceived as overly aggressive. The report described an incident where the Treasurer threw keys at an employee which demonstrated a culture characterized by bullying, micromanagement and fear-based leadership.

County leadership engaged in repeated efforts over an extended period to address these concerns directly with the Treasurer. According to the Board,²⁸ these efforts did not result in sustained improvement and increasingly diverted senior staff time from broader county responsibilities.

Operational issues within the Treasurer's office further contributed to the Board's concerns involving delays in processing checks and issuing refunds, including those owed to school districts, as well as longstanding backlogs in property tax liens.²⁹ Members of the Board also expressed concern that ongoing personnel and

²⁶ See Appendix D. Fact Sheet: *Board of Supervisors Fact Sheet on TTC*, February 24, 2025.

²⁷ Confidential Investigative Report County of Orange – Shari Freidenrich April 29, 2022
https://www.documentcloud.org/documents/25546947-shari-freidenrich-key-throwing-investigation-report-released-by-county-of-orange/?_gl=1*iq6ygf*_gcl_au*ODU1NzA3NDg5LjE3NzQ0NjA0NDk.

²⁸ Orange County Board of Supervisors Meeting of 02/25/2025 Item S36C.
[https://ocgov.granicus.com/player/clip/5376?view_id=20&redirect=true#:~:text=S36C.%20County%20Council%20Consider%20second%20reading%20and%20adoption%20of%20E2%80%9CAn%20Ordinance%20of%20the%20County%20of%20Orange%2C%20California%20Amending%20Section%201%2D2%2D320%2C%20Subsection%20\(d\)%20of%20the%20Codified%20Ordinances%20of%20the%20County%20of%20Orange%20Regarding%20Investment%20Authority%E2%80%9D%202D](https://ocgov.granicus.com/player/clip/5376?view_id=20&redirect=true#:~:text=S36C.%20County%20Council%20Consider%20second%20reading%20and%20adoption%20of%20E2%80%9CAn%20Ordinance%20of%20the%20County%20of%20Orange%2C%20California%20Amending%20Section%201%2D2%2D320%2C%20Subsection%20(d)%20of%20the%20Codified%20Ordinances%20of%20the%20County%20of%20Orange%20Regarding%20Investment%20Authority%E2%80%9D%202D)

²⁹ See Appendix D. Fact Sheet: *Board of Supervisors Fact Sheet on TTC*, February 24, 2025.

management challenges could eventually affect the security of public funds. Although the investment pool itself remained stable, the Chairman of the Board concluded that the cumulative pattern of operational deficiencies created an unacceptable level of risk for an office entrusted with large-scale public assets.³⁰

In 2025, the Board declined to renew the Treasurer's investment authority, resulting in the transfer of oversight of the investment pool to the County's Executive Officer. The Chairman of the Board later stated that this action was necessary to protect and ensure continuity of public funds.³¹ The Board's actions prompted inquiries from state officials, who questioned the transparency of the process and the sufficiency of the public explanation provided.³² While acknowledging the seriousness of the workplace and management concerns, state representatives emphasized the need for clear justification when altering the authority of an elected official responsible for safeguarding substantial public assets.³³

The situation highlights a structural tension within County governance: independently elected officials possess significant operational authority, however the Board's ability to intervene is limited unless statutory conditions³⁴ are met. The Treasurer's case demonstrates how leadership and operational deficiencies, if left unaddressed, can create risks that extend beyond internal personnel matters and affect the integrity of countywide financial operations.

Despite the seriousness of the Treasurer's conduct, there appears to be no evidence that certain behavior has been corrected. In fact, a recent survey of employees represented by the Orange County Employees Association (OCEA), along with interviews with Treasurer staff, revealed persistent fear, distrust, and low morale.³⁵

Accountability Measures Warranted

The Grand Jury's review of the Treasurer's workplace methods revealed a sustained historical pattern of executive instability and workplace dysfunction that collectively compromises the effective administration of a core County function. Internal County assessments, media reporting, and corroborating witness testimony presented a consistent picture of an office unable or unwilling to meet basic standards of management and organizational leadership and productive work environment.

³⁰ See Appendix E. Letter from Board Chair Chaffee to Assemblymember Valencia.

³¹ See Appendix E. Letter from Board Chair Chaffee to Assemblymember Valencia.

³² See Appendix E. Letter from Board Chair Chaffee to Assemblymember Valencia.

³³ See Appendix E. Letter from Board Chair Chaffee to Assemblymember Valencia.

³⁴ See Appendix A: California Constitution Article XI and Government Code §24009

³⁵ See Appendix F: Orange County Employees Association Surveys 2021 and 2025

The Board's decision to discontinue the Treasurer's investment authority reflected the seriousness of these concerns and the risks posed to the County's financial integrity.³⁶ However, the circumstances surrounding this action also underscore a broader structural challenge within County governance: independently elected officials exercise substantial operational authority, but the Board's ability to address persistent mismanagement is limited. The Treasurer's case demonstrates how leadership failures, if left uncorrected, can extend beyond internal personnel matters and potentially impact sound financial decision-making.

Despite repeated interventions by County leadership, there is no evidence that the underlying issues within the Treasurer's office have been resolved. Recent employee surveys and interviews indicate that fear, distrust, and low morale continue to characterize the workplace environment.³⁷ These conditions, combined with longstanding executive deficiencies, present ongoing financial risks as demonstrated by persistent operational inconsistencies, lapses in internal controls, and repeated deviations from established fiscal standards. Collectively, these indicators underscore the need for corrective action to restore appropriate operations, stability and accountability within the department.

The Grand Jury found that the deficiencies identified within the Treasurer's office are not isolated incidents but reflect systemic problems requiring sustained oversight, structural safeguards, and a reassessment of the governance framework under which independently elected officers operate. The Board must be positioned to hold the Treasurer accountable for fulfilling the constitutional duties of the office on behalf of the residents of Orange County.

ACCOUNTABILITY THROUGH COUNTY CHARTER AMENDMENTS

Governance Integrity Measure: Removing Public Officials for Misconduct

*The current Board has a dilemma:
how to preserve the independence of elected officials*

³⁶ Orange County Board of Supervisors Meeting of 02/25/2025 Item S36C.

[https://ocgov.granicus.com/player/clip/5376?view_id=20&redirect=true#:~:text=S36C.%20County%20Counse%20el%C2%A0%2D%20Consider%20second%20reading%20and%20adoption%20of%20E2%80%9CAn%20Ordinance%20of%20the%20County%20of%20Orange%2C%20California%20Amending%20Section%201%2D2%2D320%2C%20Subsection%20\(d\)%20of%20the%20Codified%20Ordinances%20of%20the%20County%20of%20Orange%20Regarding%20Investment%20Authority%E2%80%9D%20%2D](https://ocgov.granicus.com/player/clip/5376?view_id=20&redirect=true#:~:text=S36C.%20County%20Counse%20el%C2%A0%2D%20Consider%20second%20reading%20and%20adoption%20of%20E2%80%9CAn%20Ordinance%20of%20the%20County%20of%20Orange%2C%20California%20Amending%20Section%201%2D2%2D320%2C%20Subsection%20(d)%20of%20the%20Codified%20Ordinances%20of%20the%20County%20of%20Orange%20Regarding%20Investment%20Authority%E2%80%9D%20%2D)

³⁷ . Farzan, Yusra and Gerda, Nick. LAist March 19, 2025. *OC Investigation found elected Assessor Treated Womer as Subservient, Harassed Employees Over Her Disability.*

while also protecting the public from serious misconduct that falls short of criminal conviction but nonetheless damages trust, finances, and institutional stability.

In 2007, the Board briefly explored a way to remove an elected County official, most notably the Sheriff, through a charter amendment requiring a four-fifths (supermajority) vote of the Board.³⁸ The discussion emerged in the wake of Sheriff Mike Carona's federal indictment on corruption charges, which created intense public pressure and revealed the limits of the Board's legal power.

The idea originated with former Supervisor John Moorlach, who proposed a charter amendment that would allow the Board to remove an elected official³⁹. Despite the controversy surrounding Carona, the Board ultimately voted down the proposal. Several members argued that granting themselves the power to remove another elected official was too drastic and risked undermining the will of the voters. Others worried that the Board could become a quasi-judicial body, responding to accusations or media pressure rather than due process.⁴⁰

The Board lacked legal power to remove him, and Sheriff Carona remained in office after his indictment. State law allowed him to continue serving unless he was convicted or chose to resign. During the escalating controversy, Sheriff Carona took a 60-day leave of absence, and in January 2008 he ultimately resigned to focus on his criminal defense.⁴¹ Consequently, the Board decided not to pursue supermajority removal authority in 2007.

The current Board has a dilemma: how to preserve the independence of elected officials while also protecting the public from serious misconduct that falls short of criminal conviction but nonetheless damages trust, finances, and institutional stability. Under California law, an elected county official can be removed only by recall, resignation,

³⁸See Appendix G: Memo from Vice-Chairman Moorlach to add supplemental item to the 11-06-07 Board meeting agenda, re: charter amendment for placement on the February 2008 ballot

³⁹ See Appendix G: Memo from Vice-Chairman Moorlach to add supplemental item to the 11-06-07 Board meeting agenda, re: charter amendment for placement on the February 2008 ballot

⁴⁰ S32A. Supervisor Moorlach - Direct Registrar of Voters to place proposed Charter amendment for removal of Elected County Officials on ballot for election to be held on 2/5/08; and direct County Counsel to prepare the ballot title and summary and impartial analysis of the ordinance, and forward them to the Registrar of Voters 24135 NNN MOTION FAILED TO CARRY TO APPROVE AS RECOMMENDED WITH MODIFICATIONS TO THE PROPOSED ORDINANCE TO REMOVE "OTHER THAN SUPERVISOR" AND CHANGE "HIM" TO "HIM/HER" IN SECTION 301 AND ADD "NOT WITHSTANDING ANY CONFLICTING CHARTER PROVISIONS" TO INTRODUCTION

⁴¹ Valot, Susan. LAist November 6, 2007. *OC Supervisors Defeat Measure to Remove Sheriff; Corona Announces 60-Day Leave.*

criminal conviction, or statutory vacancy.⁴² Recall elections are costly, slow, politically charged, and tend to be ill-suited for addressing administrative misconduct or fiduciary failures. Criminal prosecution requires proof beyond a reasonable doubt and addresses only violations of law. Such prosecutions do not address sustained mismanagement, abuse of authority, or neglect of statutory duties. The result is a lack of options when dealing with serious but non-criminal misconduct, leaving the County with few practical tools to protect the public interest.

Other California charter counties have begun addressing this deficiency. In San Bernardino County, the county charter authorizes the Board of Supervisors to remove any elected county officer (other than a supervisor) for cause by a four-fifths vote. This authority has existed for years without being invalidated by courts.⁴³ Importantly, it is designed as a high-threshold safeguard that requires cause, procedure and a supermajority vote.

More recently, voters in San Mateo County approved a charter amendment authorizing their Board of Supervisors to remove the elected Sheriff for cause by a four-fifths vote.⁴⁴ This reform emerged after public controversy and was framed as a means for ensuring accountability. Removal requires notice, investigation, a hearing, and formal findings. Voters overwhelmingly approved it, signaling that citizens can and will support structural reform.⁴⁵

Orange County is similarly a charter county. In addition to the Board of Supervisors, there are six elected officials: Assessor, Auditor-Controller, Clerk-Recorder, District Attorney-Public Administrator, Sheriff-Coroner, and Treasurer-Tax Collector. The Assessor and Treasurer hold offices with fiduciary responsibility whose performance affects every taxpayer, school district, and local agency in the County. When serious misconduct occurs in such offices, including sustained harassment, gross mismanagement, neglect of statutory duties, or actions that potentially jeopardize the County, the consequences can be catastrophic.

Misconduct affects public confidence, fiscal stability, and legal exposure for the entire County. However, the Board, which is ultimately accountable to the public for County operations and solvency, currently lacks ability to cure the problem short of urging resignation or supporting a recall campaign. However, a carefully crafted charter

⁴² California Constitution Article II section 13.

⁴³ County of San Bernadino: § 13.0404 Supervision/Removal of County Officers.

⁴⁴ County of San Mateo: San Mateo County Charter, last amended March 2025, ARTICLE IV – DEPARTMENT HEADS, BOARDS AND COMMISSIONS, 412.5. Removal of Elected Sheriff for Cause

⁴⁵ Schuster, Kat. *San Mateo County Measure A Results: Sheriff's Future Lies In Outcome*. March 4, 2025

amendment, approved by the voters, would address this inadequacy. Removal from office would be warranted only after there is evidence of willful misconduct or gross neglect of duty. Crucially, any removal action would demand a supermajority vote – a four-fifths vote - of the Board.⁴⁶

Orange County's history of public corruption and its experience with financial crisis, underscores the importance of checks and balances. A supermajority removal provision would be available only in extreme circumstances. It would act as an emergency brake; difficult to invoke, structured to protect fairness, and designed to uphold public trust if and when serious misconduct occurs.

Reforming the Treasurer's Office

*The current Board lacks authority
to impose corrective action
or remove an elected official from office,
even when workplace misconduct
or managerial instability is substantiated.*

The Treasurer has historically served as the statutory investment officer responsible for managing the County Investment Pool. Today it is one of the largest local government investment portfolios in California. In 2024-2025, when the Board reassessed the structure of this responsibility, the County Investment Pool held approximately \$17 billion in public funds.⁴⁷ These assets represent the combined resources of the County, school districts, cities, and numerous special districts that rely on the Treasurer's office for secure and professionally managed investments. Managing a public investment portfolio of this magnitude requires exceptional professional discipline, transparency, and organizational stability.

When leadership deficiencies arise in a county department with an appointed director at the helm, the Board has clear authority to intervene, replace the executive, and restore

⁴⁶ County Charter Amendments: adopted by San Bernadino and San Mateo specify a supermajority vote for removing county elected official.

County of San Bernadino: [§ 13.0404 Supervision/Removal of County Officers.](#)

County of San Mateo: San Mateo County Charter, last amended March 2025, ARTICLE IV – DEPARTMENT HEADS, BOARDS AND COMMISSIONS, 412.5. Removal of Elected Sheriff for Cause

⁴⁷ Biesiada, Noah. *OC CEO Defends Stripping Elected Treasurer of \$17 Billion Investment Pool*. February 5, 2025

stability.⁴⁸ In contrast, because the Treasurer is an independently elected official, the Board's ability to address dysfunction is severely limited. The Board lacks authority to impose corrective action or remove an elected official from office, even when workplace misconduct or managerial instability is substantiated.

California law provides that the Board retains ultimate authority over the investment of County funds but may delegate that authority annually to the Treasurer.⁴⁹ For decades, this delegation occurred routinely. On December 31, 2024, the delegation to the Treasurer expired. At that time, the Board opted to delegate this authority to the County's Chief Financial Officer under direct Board supervision. This decision reflected not only current concerns but also the institutional memory of the 1994 Orange County Bankruptcy, when the County Investment Pool collapsed following highly leveraged investment strategies that resulted in more than \$1.6 billion in losses.⁵⁰ Although today's circumstances differ significantly, the underlying lesson remains unchanged: large public investment portfolios require resilience to the leadership failures of public officials.

Changing the Office of the Treasurer from an Elected to Appointed Position

Transitioning Orange County's Treasurer from an elected to an appointed position would offer several clear advantages.

Ensuring the safe and responsible management of public funds is one of the most fundamental obligations of county government. The structure through which these responsibilities are assigned can significantly influence how effectively they are carried out. The current issues within the Treasurer's office highlight vulnerabilities. When a position with such substantial financial authority is filled through an electoral process rather than through a professional appointment, oversight is limited.

Elections tend to elevate candidates based on political appeal, name recognition, or campaign messaging⁵¹. These factors do not necessarily correlate with financial expertise or managerial capability. While some elected Treasurers bring strong

⁴⁸ California Government Code §25303

⁴⁹ California Government Code sections 27000.1 and 53607.

⁵⁰ ORANGE COUNTY BOARD OF SUPERVISORS MINUTE ORDER December 16, 2025 Submitting Agency/Department: Treasurer-Tax Collector Adopt resolution approving 2026 Statement of Investment Policy and delegating investment authority to Treasurer-Tax Collector; and making related findings - All Districts The following is action taken by the Board of Supervisors: OTHER - DELETED http://cams.ocgov.com/Web_Publisher_SAM/Agenda12_16_2025_files/images/MINUTES12162025_13.RTF_9864001.PDF

⁵¹ Marsh, Wayde Z.C. "Elected versus Appointed Policy Makers: Evidence from City Treasurers." *Journal of Law, Economics, and Organization*. The University of Chicago Press.

qualifications to the role, the electoral system offers no guarantee that the individual entrusted with managing billions of dollars in public assets will possess the technical proficiency or disciplined oversight required for such a complex portfolio. When leadership challenges emerge, as they have in Orange County, the ability to intervene or correct course is limited.

Recognizing these concerns, many jurisdictions in California and across the country have shifted toward appointing their finance officials⁵². Appointed Treasurers are selected through competitive recruitment processes that prioritize professional credentials, experience in public finance, and demonstrated competence in managing large departments and investment pools. These professionals operate within established financial policies and standards, and they remain accountable to the Board of Supervisors through a structured reporting relationship. This model reflects accepted public finance practices⁵³ and aligns the stewardship of public funds with the expertise required to manage them safely.

*Many jurisdictions in California
and across the country have shifted
toward appointing their finance officials.*

California law provides counties with considerable flexibility in structuring their governance systems, and Orange County has exercised this authority multiple times having amended its County Charter six times since 2002. State law explicitly allows counties to determine whether the Treasurer should be elected or appointed, and many have already chosen the latter.⁵⁴

Transitioning Orange County's Treasurer from an elected to an appointed position would offer several clear advantages. It would allow the County to seek out candidates with specialized expertise in treasury management, investment strategy, public finance and staff management. It would establish a direct line of accountability to the Board, ensuring that voters retain oversight through their elected Board representatives. And it would reduce political pressures that can distort financial decision-making, helping to ensure that investment strategies are guided by fiscal prudence rather than electoral considerations. Pairing an appointed role with performance-based contract terms would further strengthen accountability and provide a structured framework for ongoing evaluation. Given the scale of the financial responsibilities involved and the lessons

⁵²National Association of Counties Research 2022. Naco.org

⁵³ National Association of Counties Research 2022. Naco.org

⁵⁴ National Association of Counties Research 2022. Naco.org

learned from recent management challenges, it is reasonable for Orange County voters and the Board to consider whether the current structure best serves the public interest.

Consolidating the Assessor’s Office with the County Clerk-Recorder: A Structural Path to Improve Oversight

Consolidation would standardize reporting and integrate systems, enabling auditors to identify patterns of mismanagement or inefficiency more readily.

The Assessor and Clerk-Recorder perform related functions involving property ownership, public records, and taxation. Despite this alignment, in Orange County, they currently operate as separate elected offices, each with its own management structure, administrative systems, and decision-making authority. The Grand Jury examined whether consolidating these elected offices would strengthen the Board’s oversight by reducing fragmentation and improving the clarity of organizational responsibility.

The California Little Hoover Commission (“Commission”)⁵⁵ has repeatedly found that consolidating related public-facing administrative functions can reduce duplication, streamline operations, and improve accountability. In reports such as “*Government Reorganization: Making Government More Effective, Efficient, and Transparent*” (2010) and “*A Customer-Centric Upgrade for California Government*” (2015), the Commission concluded that fragmented governance structures often obscure responsibility, create inconsistent reporting systems, and weaken oversight.⁵⁶

These findings support the conclusion that merging the Assessor and Clerk-Recorder could yield several governance benefits:

- Reduce duplication of services
- Improve operational efficiency
- Clarify roles and responsibilities
- Enhance coordination across related functions.

⁵⁵ Little Hoover Commission is a statutory balanced bipartisan commission that considers ways to promote economy, efficiency, and improved service in government. Little Hoover Commission webpage: <https://lhc.ca.gov/about/organization/>

⁵⁶ See California Little Hoover Commission, “Government Reorganization: Making Government More Effective, Efficient, and Transparent” (2010), and “A Customer-Centric Upgrade for California Government” (2015), both of which conclude that fragmented administrative structures reduce transparency, weaken accountability, and impede effective oversight.

According to the Commission’s analysis of structural consolidation, integrating related offices into a single organizational entity strengthens oversight by creating a unified chain of responsibility and reducing overlapping administrative functions and costs.⁵⁷ More importantly, consolidation enhances accountability by simplifying reporting structures and making performance easier to evaluate.

A consolidated structure would also significantly improve transparency. The current fragmented system allows inconsistencies in data, reporting, and decision-making. In San Diego’s Assessor/Clerk-Recorder Office, for example, a unified office integrates property records and valuation systems, produces consistent and reliable public reporting, and provides a single point of contact.⁵⁸ This clarity makes it easier for both the public and the Board to understand, evaluate, and hold accountable the performance of property-related functions.

Oversight tools available to the Board, specifically internal audit functions, become more effective when applied to a unified organization rather than departments with overlapping responsibilities. Consolidation would standardize reporting and integrate systems, enabling auditors to identify patterns of mismanagement or inefficiency more readily. These improvements do not expand the Board’s legal authority, but they do enhance their current authority.

The California Little Hoover Commission has repeatedly found that consolidating related public-facing administrative functions can reduce duplication, streamline operations, and improve accountability.

The Grand Jury recognizes that consolidation does not alter the independence of elected officials. By merging the Assessor and Clerk-Recorder into a single organizational entity, the County could strengthen the effectiveness of existing oversight. Consolidation represents a clear, achievable step toward a more coherent, efficient, and accountable system for the County.

⁵⁷ See California Little Hoover Commission, “Government Reorganization: Making Government More Effective, Efficient, and Transparent” (2010), and “A Customer-Centric Upgrade for California Government” (2015), both of which conclude that fragmented administrative structures reduce transparency, weaken accountability, and impede effective oversight.

⁵⁸ <https://www.sdardd.gov/content/arcc/home/division/assessor.html>

Consolidation of Assessor Offices in California Counties

California law grants counties discretion to consolidate certain elected offices when doing so improves administrative efficiency or aligns related functions under a single leadership structure.⁵⁹

These models demonstrate that consolidation is a well-established governance option across California, particularly in counties seeking to streamline administrative functions, reduce redundancies, or improve coordination among related departments. The fact that half of California's counties have adopted some form of consolidation underscores its viability as a structural reform tool. These consolidations generally follow two primary models:

Compatible Office Consolidations Throughout California

According to the California Secretary of State's 2025 County Officials roster, the consolidations take one of two forms:

- Assessor–Recorder (13 counties)
Alpine, Fresno, Kern, Lake, Lassen, Mariposa, Modoc, Santa Cruz, San Francisco, Shasta, Siskiyou, Solano, Tuolumne
- Assessor–Recorder–County Clerk (or Assessor/Clerk/Recorder) (16 counties):
Glenn, Kings, Marin, Merced, Monterey, Napa, Riverside, San Bernardino, San Diego, San Joaquin, San Mateo, Santa Barbara, Sonoma, Trinity, Tulare, Yolo

COUNTY INTERNAL AUDIT DEPARTMENT

An Expanded Role in Performance Oversight

The Internal Audit Department (IAD) reports directly to the Board and serves as the County's primary independent oversight entity. The mission of the Internal Audit Department (IAD) is to provide highly reliable, independent, objective evaluations and business and financial advisory services to the Board of Supervisors and County management to assist them with their important business and financial decisions, and to protect and safeguard the County's resources and assets.⁶⁰

In 2023, the Board combined two departments and expanded IAD's responsibilities by consolidating the Performance Review Department with IAD. This expansion occurred at a time when investigations and documented concerns involving elected officials, including the Assessor and Treasurer, raised questions about the adequacy of existing oversight mechanisms. Because state law restricts the Board's direct supervisory authority over elected officials, the Grand Jury examined whether IAD could serve as a more consistent and proactive tool for operational oversight and performance

⁵⁹ California Constitution Article XI §4

⁶⁰ Orange County OC.gov, Departments, Internal Audit <https://iad.oc.gov/>

accountability. IAD conducts its work under widely recognized professional auditing standards and is authorized to evaluate internal controls and operational effectiveness.⁶¹

Audits of certain elected officials' management performance have been insufficient in scope and frequency.

Documented concerns involving the Assessor and Treasurer underscore the need for stronger oversight mechanisms capable of identifying management deficiencies, operational risks, and systemic weaknesses before they escalate into larger problems. Because California law provides limited means for disciplining or removing elected officials, independent performance audits, when fully staffed and adequately funded, are among the few tools available to provide objective evaluation, transparency, and corrective recommendations. The effectiveness of IAD depends on sustained investment in staffing, resources, and audit capacity.

IAD's performance reviews evaluate:

- Internal management practices,
- Compliance with County policies and State law,⁶²
- Operational efficiencies and staff utilization,
- Internal control systems and financial safeguards,
- Workplace management and compliance with employment regulations,
- Technology modernization and data-management practices.

By incorporating elected officials into a more robust, professionally executed audit plan, the Board can establish a structured review process that strengthens accountability and ensures that the otherwise autonomous offices of elected officials are subject to the rigorous scrutiny of comprehensive performance evaluations.

⁶¹ The IPPF: *Global Internal Audit Standards, Requirements, and Guidance*. theiia.org

⁶² The IPPF: *Global Internal Audit Standards, Requirements, and Guidance*. theiia.org

CONCLUSION

*The County must decide
whether its current framework
adequately protects the public interest.*

Orange County's governance structure limits the Board's ability to hold elected officials accountable, even when investigations confirm misconduct or mismanagement. As a result, problems persist and the County faces avoidable risks. Criminal and administrative misconduct over the past fifty years illustrates how these structural gaps allow violations and poor performance to continue.

Addressing these issues requires aligning responsibility with enforceable oversight. Other counties have adopted stronger safeguards: strong audit protocols, removing officials for misconduct, transitioning positions from elected to appointed, and/or combining compatible offices for efficiency. These considerations are warranted.

Ultimately, the County must decide whether its current framework adequately protects the public interest or whether structural changes are needed to prevent future oversight failures and restore appropriate operations and methods for performing official duties. In this context, the following findings form the basis for the Grand Jury's recommendations to establish a transparent and accountable system in Orange County.

The Grand Jury recognizes and commends the professional staff members of the Assessor's office and the employees of the Treasurer's office for their steadfast commitment to public service and the effective execution of critical County functions despite the challenges presented to them.

The Grand Jury found that the annual preparation and delivery of the County's property tax roll to be a highly technical and labor-intensive process involving valuation, verification, appeals processing, and compliance with State law. The work is accomplished through the diligence, institutional knowledge, and professionalism of these employees. Similarly, the essential functions of tax collection, cash management, fund distribution, and financial reconciliation performed by the Treasurer's office are conducted with precision and accountability by its workforce, ensuring continuity of government services and public trust in County financial operations.

FINDINGS

In accordance with California Penal Code Sections 933 and 933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency affected by the findings presented in this section. The responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury has arrived at the following principal findings.

- F1** Elected County officials exercise substantial autonomy in managing their departments while administering functions involving significant public financial responsibilities.
- F2** The County lacks sufficient authority, structures and internal controls to ensure effective oversight and accountability of elected officials.
- F3** The Orange County Charter does not provide the Board of Supervisors with authority to address misconduct or performance deficiencies involving elected officials.
- F4** Some counties in California have amended their charters to strengthen oversight and implement internal controls for elected officials.
- F5** Several counties in California have transitioned specific non-constitutional county offices from elected to appointed positions to ensure better accountability.
- F6** Consolidating compatible County elected offices can improve efficiency, reduce duplication, and strengthen oversight.
- F7** Independent audits provide an effective mechanism for identifying operational weaknesses, governance concerns, and compliance issues within departments administered by elected officials.
- F8** The County Internal Audit Department is an important entity that functions as independent oversight reporting directly to the Board of Supervisors and conducts audits in accordance with recognized professional auditing standards.
- F9** The Board of Supervisors has expanded Internal Audit Department's responsibilities to include performance auditing; however, sufficient staffing and resources are required to support this expanded role.

RECOMMENDATIONS

In accordance with California Penal Code Sections 933 and 933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency affected by the recommendations presented in this section. The responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury makes the following recommendations:

- R1** The Board of Supervisors should draft one or more of the proposed amendments to the County charter to be submitted to voters in order to strengthen the Board's ability to exercise appropriate governance oversight of elected officials by December 31, 2026.
- Amendments:
- Authorization for the Board of Supervisors to remove an elected official for cause by a four-fifths supermajority vote.
 - Authorization for the Board of Supervisors to convert an elected office to an appointed position.
 - Authorization to consolidate compatible County departments and merge two elected or appointed offices into one elected position.
- F1, F2, F3, F4, F5, F6
- R2** The Board of Supervisors should adopt a policy mandating regularly scheduled audits or performance reviews of elected officials by December 31, 2026.
- F7, F8, F9
- R3** The Board of Supervisors should direct the County Internal Audit Department to develop standardized procedures for publicly reporting corrective actions taken in response to audit findings involving offices of elected officials by December 31, 2026.
- F7, F8, F9
- R4** The Board of Supervisors should establish a formal process for periodic public reporting and discussion of internal audit findings involving departments administered by elected officials, including presentation of audit results at Board meetings to promote transparency and accountability to Orange County residents by December 31, 2026.
- F7, F8, F9

- R5** The Board of Supervisor should ensure that the County Internal Audit Department maintains sufficient staffing and budgetary resources to carry out its expanded responsibilities for operational performance reviews and oversight of departments administered by elected officials by December 31, 2026.
F7, F8, F9

REQUIRED RESPONSES

The following excerpts from the California Penal Code provide the requirements for public agencies to respond to the Findings and Recommendations of this Grand Jury report:

§933

(c) No later than 90 days after the grand jury submits a final report on the operations of any public agency subject to its reviewing authority, the governing body of the public agency shall comment to the presiding judge of the superior court on the findings and recommendations pertaining to matters under the control of the governing body, and every elected county officer or agency head for which the grand jury has responsibility pursuant to Section 914.1 shall comment within 60 days to the presiding judge of the superior court, with an information copy sent to the board of supervisors, on the findings and recommendations pertaining to matters under the control of that county officer or agency head and any agency or agencies which that officer or agency head supervises or controls. In any city and county, the mayor shall also comment on the findings and recommendations. All of these comments and reports shall forthwith be submitted to the presiding judge of the superior court who impaneled the grand jury. A copy of all responses to grand jury reports shall be placed on file with the clerk of the public agency and the office of the county clerk, or the mayor when applicable, and shall remain on file in those offices. One copy shall be placed on file with the applicable grand jury final report by, and in the control of the currently impaneled grand jury, where it shall be maintained for a minimum of five years.

§933.05.

(a) For purposes of subdivision (b) of Section 933, as to each grand jury finding, the responding person or entity shall indicate one of the following:

(1) The respondent agrees with the finding.

(2) The respondent disagrees wholly or partially with the finding, in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons, therefore.

(b) For purposes of subdivision (b) of Section 933, as to each grand jury recommendation, the responding person or entity shall report one of the following actions:

(1) The recommendation has been implemented, with a summary regarding the implemented action.

(2) The recommendation has not yet been implemented, but will be implemented in the future, with a timeframe for implementation.

(3) The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a timeframe for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of the public agency when applicable. This timeframe shall not exceed six months from the date of publication of the grand jury report.

(4) The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation, therefore.

(c) However, if a finding or recommendation of the grand jury addresses budgetary or personnel matters of a county agency or department headed by an elected officer, both the agency or department head and the board of supervisors shall respond if requested by the grand jury, but the response of the board of supervisors shall address only those budgetary or personnel matters over which it has some decision-making authority. The response of the elected agency or department head shall address all aspects of the findings or recommendations affecting his or her agency or department.

(d) A grand jury may request a subject person or entity to come before the grand jury for the purpose of reading and discussing the findings of the grand jury report that relates to that person or entity in order to verify the accuracy of the findings prior to their release.

(e) During an investigation, the grand jury shall meet with the subject of that investigation regarding the investigation, unless the court, either on its own determination or upon request of the foreperson of the grand jury, determines that such a meeting would be detrimental.

(f) A grand jury shall provide to the affected agency a copy of the portion of the grand jury report relating to that person or entity two working days prior to its public release and after the approval of the presiding judge. No officer, agency, department, or governing body of a public agency shall disclose any contents of the report prior to the public release of the final report.

(Amended by Stats. 1997, Ch. 443, Sec. 5. Effective January 1, 1998.)

Comments to the Presiding Judge of the Superior Court in compliance with Penal Code §933.05 are required from:

Orange County Board of Supervisors

Findings:

Recommendations:

90 Day Response Required

F1, F2, F3, F4, F5, F6, F7, F8, F9

R1, R2, R2, R4, R5

ACRONYMS and TERMS

Assessor	County of Orange Assessor
Board	County of Orange Board of Supervisors
Clerk-Recorder	County of Orange Clerk-Recorder
Commission	Little Hoover Commission
County HR	County of Orange Human Resource Services
EEO	Equal Employment Opportunity Act
GAO	U.S. Government Accountability Office
Grand Jury	2025-2026 Orange County Grand Jury
IAD	County of Orange Internal Audit Department
ICMA	International City/County Management Association
OCEA	Orange County Employees Association
OCTP	Orange County Treasury Pool or County Investment Pool
Treasurer or TTC	County of Orange Treasurer-Tax Collector

BIBLIOGRAPHY

Arduengo, Susan. Burke, Williams & Sorensen, LLP. Confial Investigation Report (redacted). Prepared for County of Orange. Re: Orange County Assessor Claude Parrish. May 16, 2023. https://s3.documentcloud.org/documents/25563834/workplace-misconduct-investigation-report-regarding-oc-assessor-claude-parrish.pdf?_gl=1*12m5v6a*_gcl_au*ODU1NzA3NDg5LjE3NzQ0NjA0NDk.

Bell, Chanon. Under the Direction of Jacqueline Byers. National Association of Counties. "History of County Term Limits". February 2011. <https://www.naco.org/sites/default/files/documents/County%20Term%20Limits.pdf>

Berkeley Institute of Governmental Studies. "Voters Favor Term Limits for Local County Supervisors, District Attorneys, and Sheriffs". June 25, 2024. <https://escholarship.org/uc/item/3b30n0f5>

Biesiada, Noah. "Orange County Assessor: Tustin Fire Could Tank Property Values". *Voice of OC*. December 12, 2023. <https://voiceofoc.org/2023/12/orange-county-assessor-tustin-fire-could-tank-property-values/>

Biesiada, Noah. "OC Treasurer Tries to Fire Deputy After She Pulls Papers to Run for Her Seat." *Voice of OC*. January 21, 2026. <https://voiceofoc.org/2026/01/oc-treasurer-tries-to-fire-deputy-after-she-pulls-papers-to-run-for-her-seat/>

Brown, Janice P. and PeBenito, Angelica M. Confidential Investigative Report.

"Shari Friedenrich Key-Throwing Investigation Report Released by County of Orange." April 29, 2022. https://www.documentcloud.org/documents/25546947-shari-freidenrich-key-throwing-investigation-report-released-by-county-of-orange/?_gl=1*1q6ygf*_gcl_au*ODU1NzA3NDg5LjE3NzQ0NjA0NDk.

California Attorney General. Re: Proposed Initiative Related to Term Limits for County Officers (A.G.FileNo 13-0044). December 20, 2013. <https://oag.ca.gov/system/files/initiatives/pdfs/fiscal-impact-estimate-report%2813-0044%29.pdf>

California Constitution Article XI-Local Government. Section 1 & Section 4. <https://www.leginfo.ca.gov/const-toc.html>

Charter of The County of Orange. Includes Amendments Through March 3, 2020. <https://www.ocgov.com/about-county/info-oc/news-room/publications/oc-charter>

Charter of San Bernardino County, California. Revised July 24, 2020. <https://wp.sbcounty.gov/wp-content/uploads/sites/44/2020/07/ATT-ORD-071420-Revised-Charter-v7.pdf>

Civil Rights Department State of California. "California Law Prohibits Workplace Discrimination & Harassment." www.calcivilrights.ca.gov.

County Charter Amendments: adopted by San Bernadino and San Mateo specify a supermajority vote for removing county elected official.

County of San Bernadino: [§ 13.0404 Supervision/Removal of County Officers.](#)

County of San Mateo: San Mateo County Charter, last amended March 2025, ARTICLE IV – DEPARTMENT HEADS, BOARDS AND COMMISSIONS, 412.5. Removal of Elected Sheriff for Cause

County of Orange. Equal Employment and Anti-Harassment Policy and Procedure. County Executive Office. Human Resources Services. 12/19/2023. <https://hrs.oc.gov/sites/hrs/files/2024-01/EEO%20and%20Anti-Harassment%20Policy%20121923.pdf>

County of San Mateo. County Executive Office. “County Supervisors to Ask Voters for Power to Remove Sheriff.” December 3, 2024. <https://www.smcgov.org/ceo/news/county-supervisors-ask-voters-power-remove-sheriff>

County of San Mateo: San Mateo County Charter, last amended March 2025, ARTICLE IV – DEPARTMENT HEADS, BOARDS AND COMMISSIONS, 412.5. Removal of Elected Sheriff for Cause

Elattar, Hosam. “OC Supervisors Break Silence; Publicly Blast Treasurer’s Alleged Workplace Hostility.” *Voice of OC*. February 26, 2025. <https://voiceofoc.org/2025/02/oc-supervisors-break-silence-publicly-blast-treasurers-alleged-workplace-hostility/>

Fact Sheet. Treasurer-Tax Collector. TTC Fact Sheet. Feb 24, 2025. https://www.dropbox.com/scl/fo/ibx4okvwhwkm603by3n5n/AJB7hI3_v1Emur-MMkff8Ug/02.24.25%20TTC%20Board%20FAQs.docx?rlkey=alj4figr3p5ne942swp2rvlep&e=2&st=43lg2ou6&dl=0

Farzan, Yusra and Gerda, Nick. “OC Investigation Found Elected Assessor Treated Women as Subservient, Harassed employee Over Her Disability.” *LAist*. March 19, 2025. <https://laist.com/news/politics/orange-county-assessor-claude-parrish-harassment-investigation>

Fontana Herald. “Former San Bernardino County Officials are Charged in Huge Corruption Case. Feb 11, 2010”. <https://www.fontanaheraldnews.com/news/former-san-bernardion-county-officials-are-charged-in-huge-corruption-case>.

Frater, Elizaeth A. Burke, Williams & Sorenson, LLP. Confidential Investigation Report. Prepared for the County of Orange. Re: District Attorney Office. August 2, 2021.

Green, Rebecca and Petrusis, Jennifer. League of California Cities. “Elected Officials and Employment Law: When the Rules Don’t Apply.” April 30, 2021. <https://www.cacities.org/Resources-Documents/Member-Engagement/Professional-Departments/City-Attorneys/Library/2021/21-Spring/5-2021-Spring;-Green-Petrusis-Elected-Officials-an>

International City/County Management Association (ICMA). Practices for Effective Local Government, Management and Leadership. “Building an Ethical Culture from the Top Down.” March 1, 2026. <https://icma.org/articles/pm-magazine/leading-example-building-ethical-culture-top-down>

Letter to Claude Parrish from County of Orange Human Resources. Dec 21, 2023.

Little Hoover Commission. Report Library. “A Customer-Centric Upgrade for California Government” (2015). [Home - Little Hoover Commission](#).

Marsh, Wayde Z.C. “Elected versus Appointed Policy Makers: Evidence from City Treasurers.” *Journal of Law, Economics, and Organization*. The University of Chicago Press.

Martin, Hugo. “Power of Board to Fire Is Upheld.” *Los Angeles Times*. February 2, 2005. <https://www.latimes.com/archives/la-xpm-2005-feb-02-me-iebrief2-story.html>

National Association of Counties. “County Structure, Authority and Finances”. www.naco.org/page/county-structure-authority-and-finances

Orange County Board of Supervisors Meeting. December 16, 2025. Item 13. Deleted. “Adopt Resolution Approving 2026 Statement of Investment Policy and Delegating Investment Authority to Treasurer-Tax Collector.” https://ocgov.granicus.com/DocumentViewer.php?file=ocgov_fa62ec94cf37b75629323347faa2e406.pdf&view=1

Orange County Board of Supervisors Meeting. February 25, 2025. Item S36C.

“An Ordinance of the County of Orange, California Amending Section 1-2-320, Subsection (d) of the Codified Ordinances of the County of Orange Regarding Investment Authority.” [https://ocgov.granicus.com/player/clip/5376?view_id=20&redirect=true#:~:text=S36C.%20County%20Counsel%C2%A0%2D%20Consider%20second%20reading%20and%20adoption%20of%20%E2%80%9CAn%20Ordinance%20of%20the%20County%20of%20Orange%2C%20California%20Amending%20Section%201%2D%2D320%2C%20Subsection%20\(d\)%20of%20the%20Codified%20Ordinances%20of%20the%20County%20of%20Orange%20Regarding%20Investment%20Authority%E2%80%9D%20%2D](https://ocgov.granicus.com/player/clip/5376?view_id=20&redirect=true#:~:text=S36C.%20County%20Counsel%C2%A0%2D%20Consider%20second%20reading%20and%20adoption%20of%20%E2%80%9CAn%20Ordinance%20of%20the%20County%20of%20Orange%2C%20California%20Amending%20Section%201%2D%2D320%2C%20Subsection%20(d)%20of%20the%20Codified%20Ordinances%20of%20the%20County%20of%20Orange%20Regarding%20Investment%20Authority%E2%80%9D%20%2D)

Orange County. OCGOV.com Departments. Internal Audit. <https://iad.oc.gov/>

Orange County. OCGOV.com. Orange County Assessor Department. “Local Assessment Roll of Values.” Press Release. 2025-070125. <https://www.ocassessor.gov/>

Petrow-Cohen, Caroline. “California Voters Want Term Limits for D.A.s and Sheriffs, Berkeley Poll Finds.” *Los Angeles Times*. June 25, 2024. <https://escholarship.org/uc/item/3b30n0f5>

Superior Court of California, County of Orange, OC Grand Jury. 2023-2024 Reports (in order of release). “Review of the Assessor’s Office.” 06/14/24. ocgrandjury.org

U.S. Government Accountability Office, Standards for Internal Control in the Federal Government (GAO-14-704G), “Green Book Standards for Internal Control in the Federal Government.” <https://www.gao.gov/products/gao-14-704g>

APPENDIX A

[Justia](#) › [U.S. Law](#) › [California Law](#) › [California Constitution](#) › Article XI - Local Government

Under Article XI of the California Constitution and Government Code §24009

California Constitution

Article XI - Local Government

Section 4 - County charters shall provide for:

- (a) A governing body of 5 or more members, elected (1) by district or, (2) at large, or (3) at large, with a requirement that they reside in a district. Charter counties are subject to statutes that relate to apportioning population of governing body districts.
- (b) The compensation, terms, and removal of members of the governing body. If a county charter provides for the Legislature to prescribe the salary of the governing body, such compensation shall be prescribed by the governing body by ordinance.
- (c) An elected sheriff, an elected district attorney, an elected assessor, other officers, their election or appointment, compensation, terms and removal.
- (d) The performance of functions required by statute.
- (e) The powers and duties of governing bodies and all other county officers, and for consolidation and segregation of county officers, and for the manner of filling all vacancies occurring therein.
- (f) The fixing and regulation by governing bodies, by ordinance, of the appointment and number of assistants, deputies, clerks, attachés, and other persons to be employed, and for the prescribing and regulating by such bodies of the powers, duties, qualifications, and compensation of such persons, the times at which, and terms for which they shall be appointed, and the manner of their appointment and removal.
- (g) Whenever any county has framed and adopted a charter, and the same shall have been approved by the Legislature as herein provided, the general laws adopted by the Legislature in pursuance of Section 1(b) of this article, shall, as to such county, be superseded by said charter as to matters for which, under this section it is competent to make provision in such charter, and for which provision is made therein, except as herein otherwise expressly provided.
- (h) Charter counties shall have all the powers that are provided by this Constitution or by statute for counties.

Government Code section 24009

- (a) Except as provided in subdivision (b), the county officers to be elected by the people

are the treasurer, county clerk, auditor, sheriff, tax collector, district attorney, recorder, assessor, public administrator, and coroner.

APPENDIX B



COUNTIES

Board of Supervisors: Role and Responsibilities

Structure

The Board of Supervisors is the primary governing body of a county, combining legislative, executive, and quasi-judicial powers. Unlike federal and state governments, the Board is not divided into separate branches.

Under **Government Code Section 25000**, counties must have a Board of Supervisors with five members, unless specified otherwise in a county charter (e.g., San Francisco has 11 members and a mayor). Supervisors must live in and be registered voters of their districts. Vacancies are filled either by a local charter process or by the Governor if no such process exists.

A **majority of Board members** is needed to conduct business, and most decisions require a majority vote. Certain actions, like emergency ordinances, need four votes. Official actions can only occur during regular or special public meetings, which are governed by the Ralph M. Brown Act, ensuring transparency. The county clerk serves as the ex officio clerk of the Board unless a separate clerk is appointed.

Powers and Roles

The Board of Supervisors exercises its authority in three main roles: **executive, legislative, and quasi-judicial**.

Executive Role

- Sets county priorities and oversees departments and programs.
- Approves annual budgets and supervises the conduct of county officers and employees.
- Manages county property and allocates funding for resident services.

Supervision of County Officials: The Board supervises county officers to ensure they fulfill their duties but cannot modify or relieve them of their legal responsibilities.

For **elected officials**, such as the district attorney and sheriff:

- **District Attorney:** Supervisory authority is limited to county duties, as prosecutorial powers fall under the state attorney general.
- **Sheriff:** The Board supervises county-specific duties but cannot oversee state law enforcement or court-related responsibilities.
- **Assessor and Courts:** The Board shares funding responsibilities for courts but has limited influence over their operations, as courts maintain independence in judicial functions.

APPENDIX C



County of Orange

Human Resource Services

December 21, 2023

Claude Parrish
Orange County Assessor
500 S Main Street
Second Floor
Orange, CA 92868

Dear Mr. Parrish,

As an elected County Department Head, you are tasked with ensuring a safe and healthy working environment which is free from discrimination, harassment, retaliation, and abusive conduct (AKA bullying) for the employees assigned to your office. The County's Equal Employment Opportunity Policy ("EEO") applies to all County employees and officials and states that "... the County is committed to ensuring that no employee is subjected to unlawful discrimination, harassment, retaliation, or abusive conduct."

As you know, you were the subject of an independent investigation into claims that you violated this policy. To ensure fairness and to avoid an actual or perceived conflict of interest, the County retained the services of Burke, Williams & Sorenson, LLP law firm ("the investigator"). Their investigation has resulted in both sustained and unfounded findings of fact and violations of policy.

The investigator's findings raise serious concerns about your treatment of Assessor employees. There were thirteen complaints against you; six of which were wholly or partially sustained and in violation of the County's EEO policy. These include sustained findings of harassment and/or retaliation based on disability, sex or gender, and race. Allegations of abusive conduct, not based on a protected class, were also sustained.

As the County's Chief Human Resources Officer, I am obligated to instruct you to cease and desist from any and all conduct that violates County policy. You are further instructed to not attempt to ascertain the identity of any complainant or witness. Finally, you are directed to not take adverse action, disparage, or otherwise retaliate against any County employee because of his or her EEO complaints or participation in an EEO investigation.

400 West Civic Center Drive, 2nd Floor, Santa Ana, CA 92701 • County Administration North • Phone (714) 834-5315 • www.ocgov.com

Page 2

As an elected Department Head, it is your duty to provide a safe, healthy, and positive working environment for the County's employees assigned to you. To that end, I strongly recommend that you read the attached EEO and Anti-Harassment Policy and complete the following two-hour Workplace Harassment Prevention Training for Supervisors via Skillsoft using the attached instructions.

Any questions regarding EEO investigations should be directed to the County's EEO Office, County Counsel, or myself.

Sincerely,

Colette Farnes
Chief Human Resources Officer

Attachments:

County of Orange Equal Employment Opportunity and Anti-Harassment Policy Procedure
Workplace Harassment Prevention Training for Supervisors via Skillsoft

cc: Frank Kim, County Executive Officer
Leon J. Page, County Counsel

APPENDIX D

Fact Sheet: Board of Supervisors Fact Sheet on TTC February 24, 2025

Timeline of Recent Board Actions December 17, 2024

The investment authority that the Board delegates to the Treasurer-Tax Collector (Treasurer) automatically expires at the end of each year. The Board may, but is not required to, renew this delegation by adopting a resolution for the next calendar year. If the Board does not delegate the authority to the Treasurer, the responsibility defaults to the CEO who is responsible for implementing and administering Board policy.

January 1, 2025

Investment authority expired, thereby defaulting the authority to the CEO.

February 11, 2025 (press release)

The Board of Supervisors unanimously adopted an ordinance that allows the County Chief Financial Officer (CFO) to exercise the Board of Supervisors' investment authority and approved a County Investment Policy (Policy) that establishes investment guidelines to govern the Board's investment authority. California law vests the authority to invest monies deposited in the County treasury with the Board of Supervisors.

County investments must comply with the restrictions on permissible investments outlined in the Government Code. By adopting this Policy, the Board approved a Policy that is more restrictive than state law, consistent with the investment policies previously approved by the Board and governs the investment of the funds of the County and the funds of other depositors in the County treasury.

- * *NOTE: This is consistent with the past IPS approved by the Board, as nothing has really changed on the investments.*

The Policy includes a list of authorized investments, diversification, maturity and duration limits as well as a list of prohibited transactions. This Policy will be maintained by the County Investment Manager. This Policy will be reviewed on an annual basis and submitted to the Board annually as a receive and file item as a part of the County's Strategic Financial Plan (SFP). Any changes to the policy shall be presented to the Board for review and approval.

In addition to these actions, Supervisor Vicente Sarmiento directed staff to bring the following to the Board of Supervisors:

Directed staff to review the Voluntary Pool Participant program, and whether the program should be terminated, and which oversight committee should be charged with the responsibility for ensuring compliance with the County Investment Policy, and to return to the Board with options.

Financial Impacts

- TTC was main point of contact for Quantum contract and would not allow staff to negotiate with vendor. Negotiated contract had issues that resulted in data upload function for investment trades not being included. Vendor now wants \$128k extra to add in this function.
- \$2.7M in Earnings Credit Rebates lost at bank due to poor direction provided, lack of staffing due to attrition, prohibition on coordination and communication between teams, etc.
- Delays in deposit of checks held by the TTC causing numerous concerns including, but not limited to:
 - Stale Checks
 - Reduced yield as funds were not deposited into treasury promptly
 - Impacts to local and non-local taxpayers (incorrect late fees and penalties assessed due to delay in credit of payment, etc.)
- Delay in refund to Schools of \$550k in overcharged admin fees over a period of 3 years. Analysis completed by staff, but TTC delayed approval to process refund.
- TTC delayed approval to close School bonds funds from 2016, resulting in \$3M sitting in funds that should have been transferred and made available to schools. Not approved to close until FY 2023-24.
- TTC involvement in audits and requirement to approve every single item has caused delays in issuance and increased costs charged to the County by external auditors for these issues.
- Increased Human Resource recruitment costs for frequent recruitments due to large turnover in staff and TTCs involvement in micromanaging recruitments (job bulletin review/edits, selection interview question approval, candidate selection approve, etc. for all levels of staff)
- Increased Human Resource costs due to numerous EEO complaints and HR investigations.
- Wastes County resources by requiring staff to print every email, including all attachments, to her to make sure she reviews it. Often times printed documents are lost and have to be re-printed multiple times.
- Delays and/or prohibition of use of collection tools available to staff that help collect property tax revenue results in reduction of and delays in revenue collected. Approximate annual revenue reduction is over \$9M for FY 23-24 and FY 24-25 respectively.
 - Liens – State Guidance is to file no later than November 15th annually. For 2023 and 2024, these were delayed to March 2024 and January 2025 respectively. TTC reason for delaying filing of liens cited specific taxpayers that would be

impacted including: Disney, Home Depot, Panasonic Aviation's and Shari's Doctor's Office. This is preferential treatment.

- o State Intercept Program – Delayed due to delays in filing of liens.
- o Bank Levees, Till Taps, Property Seizures, etc. are still not approved for use by TTC. These historically have been used and are very effective in collection of taxes.
- o Property Auctions – Regular auctions are an effective tool in that many delinquent taxpayers finally pay their taxes once they are notified their property is slated to be sold in auction. For those that do not pay, the proceeds from the auction go to paying off delinquent taxes.

Questionable Investment Decision Directives and/or Risks to Investments

- Purchase only Money Market Funds that have automatic processing, regardless of yield.
- Direct Investment Staff that are initiating/approving trades to also input the trades into the Investment Accounting Record (Quantum). This is a segregation of duties issue and against best practices.
- Directive to stop sending daily portfolio monitoring reports and cancel meetings between Cash Management and Investment Teams creates risk. Lack of daily reports removes TTC from reviewing credit changes, trades, etc. Cancellation of meetings between teams inhibits ability to perform duties related to cash forecast/planning so investment team can plan for maximum investments to achieve maximum yield.
- Annual overcharges to Investment Admin Fees to pool participants due to TTC's disagreement with staff recommendations on the basis points to charge throughout the year. This results in large refunds at year-end that are delayed pending her approval approximately 6 or more months into the following year.
- Post-delegation expiration, TTC directed staff to change investment strategy immediately based on news of Federal Freeze. TTC requested to CEO to allow TTC to implement this change without providing CEO details based on the TTCs extensive knowledge and experience with investments but would not disclose her strategy. Later, the strategy was shared to put incoming funds all into Money Markets and purchase only short-term investments maturing in 30-days or less. This direction was provided by Shari without any details on the Federal Impacts to the County and without consultation with the CEO, as would have previously been done. This direction shows impulsivity and lack of judgement to implement a drastic change with little to no information. What's further concerning with this direction is that it goes against best practices for investment strategies and recommendations of investment professionals/economists that advise purchasing longer-term investments when rates are on the decline and future rate cuts are anticipated.
- Constant turnover in staff creates significant risk operations due to loss of institutional knowledge, lack of seasoned and knowledgeable employees, etc.

- Abusive treatment by TTC of staff creates risk for impacts to operations, including investments, due to burnt-out and/or disgruntled staff.

Investigations

May 19, 2021: [Performance Audit of the Treasurer-Tax Collector](#)

This report was heavily influenced by Treasurer-Tax Collector and had very few findings that were directly related to staffing and financial issues, differing from the normal performance audits that are conducted. From the report:

Summary of Findings and Issues

Our findings and recommendations in this report are based on documents and information gathered about the department. Due to delays at the start of the project and the COVID-19 pandemic, we were unable to conduct site visits where we typically are able to assess the working environment in person. To assess the adequacy of the TTC's procedures, its practices, and the resources available to the Department, we relied on the information that was directly provided by the elected Treasurer, interviews, and the employee survey.

In general, we found that the TCC provides mandated services that are consistent with

Governing Laws and Policies. The services provided by the TTC are consistent with State policies, procedures, and practices. The stakeholders we interviewed included the voluntary pool investors, the school districts, and the agencies that utilize collection services. Stakeholders reported that they were satisfied with the services they received.

Department regularly provides additional services for the County beyond the State of

California Government Code for Treasurer-Tax Collectors. The TTC provides services that are not required by State and local policy and regulations; however, it is typical for other county Treasurer-Tax Collectors to provide a variety of services for a county beyond state mandated regulations. Some non-mandated services provided by the TTC support County financial management functions, while other non-mandated services support school districts and other County departments and agencies. A shared services business plan is in place to provide services to other departments and agencies, but we did not assess whether costs are being appropriately recovered.

Vacant positions have increased workloads and responsibilities for remaining staff. The staff separation/transfer-out rate for the TTC was 34% in 2019, significantly higher than other benchmarked departments provided to us by the County's Human Resource Department. Fifty-four percent of write-in comments on the employee surveys noted being affected by staffing inadequacies. Practically, the responsibilities of unfilled positions have been assumed by other line staff. More significant, to the extent staff cannot fully cover needed roles, supervisors, and managers are filling in to complete activities in addition to their supervisory and management responsibilities. The constant practices of "filling in" for staffing vacancies, training of new staff, and training temporary hires have created inefficiencies in the department.

The investment in technology is not keeping pace with current technology. The TTC uses older technology for its financial systems and software systems are in need of upgrades. The current lack of integrated systems requires a reporting process that relies on manual inputs from a variety of sources. There have been ongoing upgrades for the treasury and investment accounting system (Quantum) since 2017, which has yet to solve these system integration issues.

There is a lack of measurable goals used by the TTC that are typically set by agencies to measure effectiveness and efficiency. While the TTC publicizes performance measures, the TTC should include measurable goals that demonstrate progress towards improvements. Typical metrics for other county Treasurer-Tax Collectors include benchmarking of investment performance to other pooled funds, collection rates of delinquent payments, timeliness of processing remittance, etc. Metrics are used to measure whether or not the department is performing up to expectations for meeting the stated goals for the County.

April 22, 2022: Meyers I Nave Confidential Investigation

As issues persisted at TTC, Meyers I Nave was retained to complete a confidential investigation report related to the Treasurer-Tax Collector's reported misconduct regarding abusive conduct, workplace violence and retaliation. These actions found the following complaints substantiated:

- 1) **Treasurer Tax Collector stood over an employee and pointed her finger in the face of an employee in a threatening manner during a conversation on August 12, 2021**
 - a. Quote from an employee in the investigation: *Everything is still the same over here. Shari was in X employee's office last Thursday yelling at her and pointing the finger in her face, all the staff heard and saw. Employee's office is glass. I kind of lost all hope in the County. I understand she's an elected official and she can do whatever she wants, but I'm a County employee and I thought for sure the County would protect us.* (p.14).

2) Threw office keys at an employee (her assistant), in violation of the County's Workplace Violence Prevention Policy

Report's Conclusion (p.24)

The numerous charges alleged by current and former employees of the County's Office of the Treasurer-Tax Collector present a troubling impression of the work environment. There now exists a highly charged atmosphere of mistrust, suspicion, and the belief that Freidenrich has engaged in demeaning, condescending, and unfair behavior. Complainants contend that Freidenrich created this situation through conduct that is punitive, abusive, and belittling, and that Freidenrich excessively monitors and micromanages employees, thus resulting in a chilling effect on the entire workplace.

Freidenrich denies the claims asserted by the Complainants. Freidenrich stated that the quality of work that comes out of her office is of utmost priority, and that she is meticulous about the work her staff does because it "has [Freidenrich's] name on it." Freidenrich says that she is the victim of negative, vindictive, and insubordinate employees. However, the evidence supports many of the Complainants' concerns regarding Freidenrich's condescending behavior and occasionally demeaning conduct, as well as the excessive micromanaging of TTC staff. In addition, the allegations related to Freidenrich's statements and conduct that were determined to be outside the scope of this investigation was considered by the Investigators to be, at a minimum, highly concerning.

In some cases, there was strong evidence to sustain or not sustain the Complainants' allegations. In other cases, the evidence was insufficient to make a finding one way or the other. What is beyond dispute is that the TTC Department has serious communication and personnel issues, many of which have developed over time and now have divided and polarized the department. Every action taken or not taken by Freidenrich is now viewed through a prism of suspicion and mistrust, which undermines the TTC's mission. Going forward, to eliminate these concerns, the issues identified in this investigative report should be addressed in a serious and respectful manner.

May 19, 2022: Letter from HR to TTC

As a result of the Meyers I Nave investigation, Colette Farnes sent a letter to the Treasurer-Tax Collector informing her of the following:

The independent investigator's findings raise serious concerns about your treatment of Treasurer-Tax Collector employees. Although the investigation did not find that isolated incidents investigated rose to the level of an EEO policy violation, it did substantiate a violation of the County's Workplace Violence policy. Physical violence in a County workplace will not be tolerated.

As the County's Chief Human Resources Officer, I am obligated to instruct you to cease and desist from any and all verbal or physical conduct that violates County policy. As an elected Department Head, it is your duty to provide a safe, healthy, and positive working environment for the County's employees assigned to you. I am aware of several strategies you have recently put in place in an effort to fulfill this duty and to improve the culture within your department. In support of providing a safe, healthy and positive workplace, I recommend the following to you:

- *Continue to delegate and allow the Assistant Treasurer-Tax Collector to independently manage the day-to-day operations of your department.*
- *Focus your attention on your community obligations – allow your managers and staff the autonomy to do their jobs while you do yours; and*
- *Work with a County-retained a professional executive management coach to learn and implement solid communication skills that will help you avoid future conflict with County employees.*

OCEA TTC Employee Survey

In 2022, OCEA conducted a survey on behalf of TTC employees, right after the Performance Audit was performed. Two-thirds of TTCs employees completed their survey. Key takeaways include:

- 80 percent were aware of the performance audit
- 76 percent read the TTC's responses to the recommendations
- 95 percent were not satisfied with the TTC's responses
- Main concerns included vacancies, leadership style and its impact as well as culture
- 67 percent stated that the Treasurer's involvement hinders their ability to fulfill their responsibilities
- Over 70 percent of respondents stated that they are NOT satisfied with their position and over 90 percent said they would transfer to another agency if they could
- The culture at TTC was described as, "toxic, hostile, terrible, unappreciated, fearful, disorganized, unhealthy and dysfunctional"
- 10/15 OCEA employees stated they have experienced harassment, retaliation, discrimination or abusive conduct by the Treasurer herself
- 12/17 OCEA employees stated that they have witnessed harassment, retaliation discrimination or abusive conduct by the Treasurer herself

CEO's Actions

- Since FY 2017-18, the CEO's office has been working closely with the Treasurer to rectify staffing issues, which were first flagged as a result of staff turnover, a large number of vacant positions, and informal complaints from employees.
 - CEO full supported filling all positions and urged the TTC to fill them expeditiously however, the involvement of the TTC in various aspects of the recruitment process delayed recruitments (e.g., she had to review every job flyer, review and approve questions, review and approve candidate selections, etc.).
 - Job bulletins that were created were overly complex as were recruitment requirements, resulting in small candidate pools.
 - The reputation of working for TTC created some challenges for recruitment as well (it was confirmed by candidates and through references checks that working for the TTC was an area of concern and warning provided to staff deterring them from accepting positions with TTC).
- The CEO's office requested a performance audit of the Treasurer-Tax Collector to identify areas for improvement. Since completion of the performance audit, the CEO's office has been working with the Treasurer to address the findings and implement the recommendations; however, the Treasurer obstructed the performance audit and continues to obstruct implementation of the recommendations. TTC employees were aware of the obstruction and disappointed with the results of the performance audit.
- OCEA reached out to the CEO's office about the results of an employee survey they conducted. The CEO's office met with OCEA and then with OCEA and the Treasurer when OCEA communicated the results of the survey. OCEA, on behalf of TTC employees, requested specific corrective actions from the Treasurer. The CEO's office oversaw the Treasurer for implementation of those action items.
- The CEO's office along with County Counsel and outside investigator handled employee complaints, which were constant and substantiated.
- During this time period, the CEO's office was informed that the conduct of the Treasurer, is interfering with employees' ability to perform their work including, but not limited to, placing liens on and auctioning properties which would have resulted in an additional \$36M in property tax revenue to the County that could have been used for the delivery of services to the community; reconciliation of fees at the end of the fiscal year resulting in a delayed return of \$550K to the schools; delayed completion of required annual audits, delayed closure of bond fund accounts resulting in delayed return of \$3M to schools.
- Most recently, the need to protect employees, especially at-will employees, in the Treasurer-Tax Collector department was brought to the Board's attention to ensure TTC staff have the ability to conduct day-to-day County business without the fear of retaliation and interference from the Treasurer.

APPENDIX E



DOUG CHAFFEE

CHAIR, ORANGE COUNTY BOARD OF SUPERVISORS
SUPERVISOR, FOURTH DISTRICT
COUNTY ADMINISTRATION NORTH
409 W. CIVIC CENTER DR.
SANTA ANA, CALIFORNIA 92701
PHONE (714) 834-3440

Avelino Valencia
Assemblymember, Sixty-Eighth District
2400 East Katella Avenue, Suite 640
Anaheim, CA 92806
Email: Assemblymember.Valencia@assembly.ca.gov

Dear Assemblymember Valencia:

Thank you for your letter, dated February 20, 2025, regarding the Orange County Board of Supervisors' ("Board") decision to retain its authority to invest the funds of the County of Orange, and other depositors in the County treasury. The Board's investment authority will now be exercised by the County Executive Officer ("CEO"), rather than delegated to the County Treasurer. The Board takes its role as a fiduciary very seriously, and we are well aware of the history of public finance in Orange County. Indeed, in 2018, the United States Bankruptcy Court formally closed the County's 1994 bankruptcy case, in large part, due to the strong financial leadership of then County Chief Financial Officer, and current Interim CEO, Michelle Aguirre. Today, the County maintains a AAA credit rating because of the Board's sound fiscal management, good financial policies, and strong budgetary performance.

The County continues to exercise prudent investment practices and thorough oversight over its investment activities. On February 11, 2025, the Board approved an investment policy to govern the exercise of its investment authority. Like prior Board-approved investment policies, this policy is more restrictive than State law. On February 25, 2025, the Board will consider expanding the oversight provided by Audit Oversight Committee to include County treasury and investment activities. Unlike the Treasury Oversight Committee, whose members were nominated by the official who was the subject of oversight, the new oversight body includes members who are appointed by the Board. In county government, the board of supervisors is statutorily responsible for ensuring that county officials faithfully perform their duties, particularly as to the functions and duties of such county officers relate to the assessing, collecting, safekeeping, management, or disbursement of public funds. (Government Code section 25303.)

The financial health of the County is strong, and our investments are secure. Nonetheless, as you note, issues have come to light regarding the Treasurer-Tax Collector's ("Treasurer") ability to effectively manage her department and this impacts her ability to effectively perform her statutory duties. For example, the Treasurer was nearly a year late in preparing the annual statement of assets for Fiscal Year 2022-23, which shows the amounts and types of assets in the County treasury, as required by Government Code section 26920. This failure to submit the statement of assets to the County's auditor in a timely manner resulted in a delay in the County's ability to complete its Annual Comprehensive Financial Report. While the statement of assets was finally submitted in November 2024, the Treasurer's failure to timely complete her statutorily mandated duties is a cause for concern for the Board.

Additionally concerning are the management and staffing issues that have continued to persist at the Treasurer's office, as reflected in a performance audit conducted of the department in 2021. At the time the performance audit was prepared, due to significant employee turnover and a growing number of vacancies during the official's tenure, the OC Treasurer-Tax Collector Department had the lowest level of full-time equivalent positions compared to similar counties, with the average count of filled positions being well below the positions budgeted for the department. According to the performance audit report, the high level of attrition increases the potential for failure.

The Treasurer was also the subject of an independent investigation, following various claims that she violated the County's Equal Employment Opportunity Policy ("EEO") and the County's Workplace Violence Policy. The investigation substantiated a violation of the Workplace Violence Policy. As a result, the Treasurer was directed by the County Chief Human Resources Officer to cease and desist from all verbal or physical conduct that violates County policy.

In your letter, you ask several questions regarding the management of the County's investment activities. I address your questions below.

- *Does the Board believe that the County Treasurer-Tax Collector failed to achieve her investment mandate to balance safety, liquidity, and yield? If so, can the Board please provide specific examples?*

No. The County investment pool remains safe, liquid, and earning a rate of return that is commensurate with the market. However, rather than waiting for an impact to the investment pool, the Board has taken proactive steps to mitigate any risk from the persistent employee retention and understaffing issues that the Treasurer has experienced.

- *Does the Board believe the investment pool should be achieving a specific investment return that is not currently being achieved? And if so, how does it plan to achieve that target?*

No. Consistent with Government Code section 53600.5, the County's primary objective in managing public funds is safeguarding principal. Our secondary objective is meeting sufficient liquidity needs. Our third objective is achieving return.

- *Will the Board establish an investment policy and guidelines so that future investment decisions are consistent with applicable state law?*

Yes. As noted above, on February 11, 2025, the Board approved the Orange County Investment Policy to govern the exercise of the Board's investment authority. Like prior Board-approved investment policies, the Policy restricts investment more than State law. A copy of the Policy is attached to this letter for your reference. Moreover, the Board is considering proposals to expand its oversight over the County's investment activities to ensure compliance with this policy by entrusting oversight to a body whose members are not nominated by the official who is subject to their oversight, as is the case with the current Treasury Oversight Committee.

- *Does the Board intend to retain a fiduciary or outside financial advisor to guide the County's investment policy?*

The County has contracted with Chandler Asset Management, Inc. to provide investment advisory services.

- *How long will the chief financial officer manage the county investment pool? Would authority return to the Orange County Treasurer-Tax Collector after the next election?*

On February 25, 2025, the Board will consider final adoption of an ordinance to remove the prohibition that prevents the County Chief Financial Officer from exercising the Board's investment authority. This prohibition was created when the Board restored investment authority to the Treasurer in 2010 after it had revoked the delegation to the former Treasurer after a judge had ruled that the former Treasurer had breached his fiduciary duties as a trustee in a bankruptcy matter. At this time, the Board has not considered whether to delegate its investment authority to the Treasurer after the next election.

I hope you find this information helpful. While I remain confident in the safety of the County investment pool, the Board will continue to take proactive measures and diligently protect the public funds in which we are entrusted.

Sincerely,

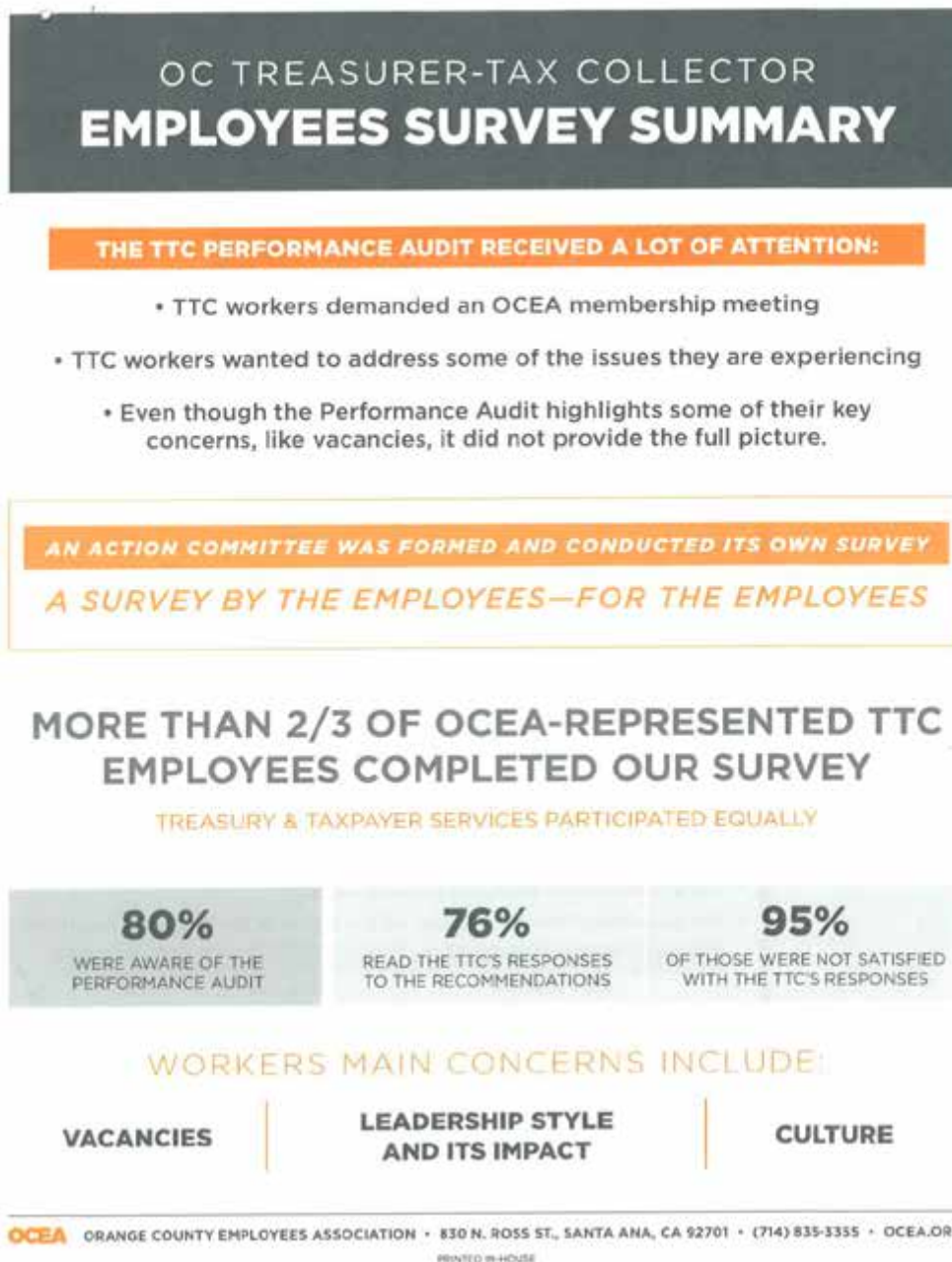


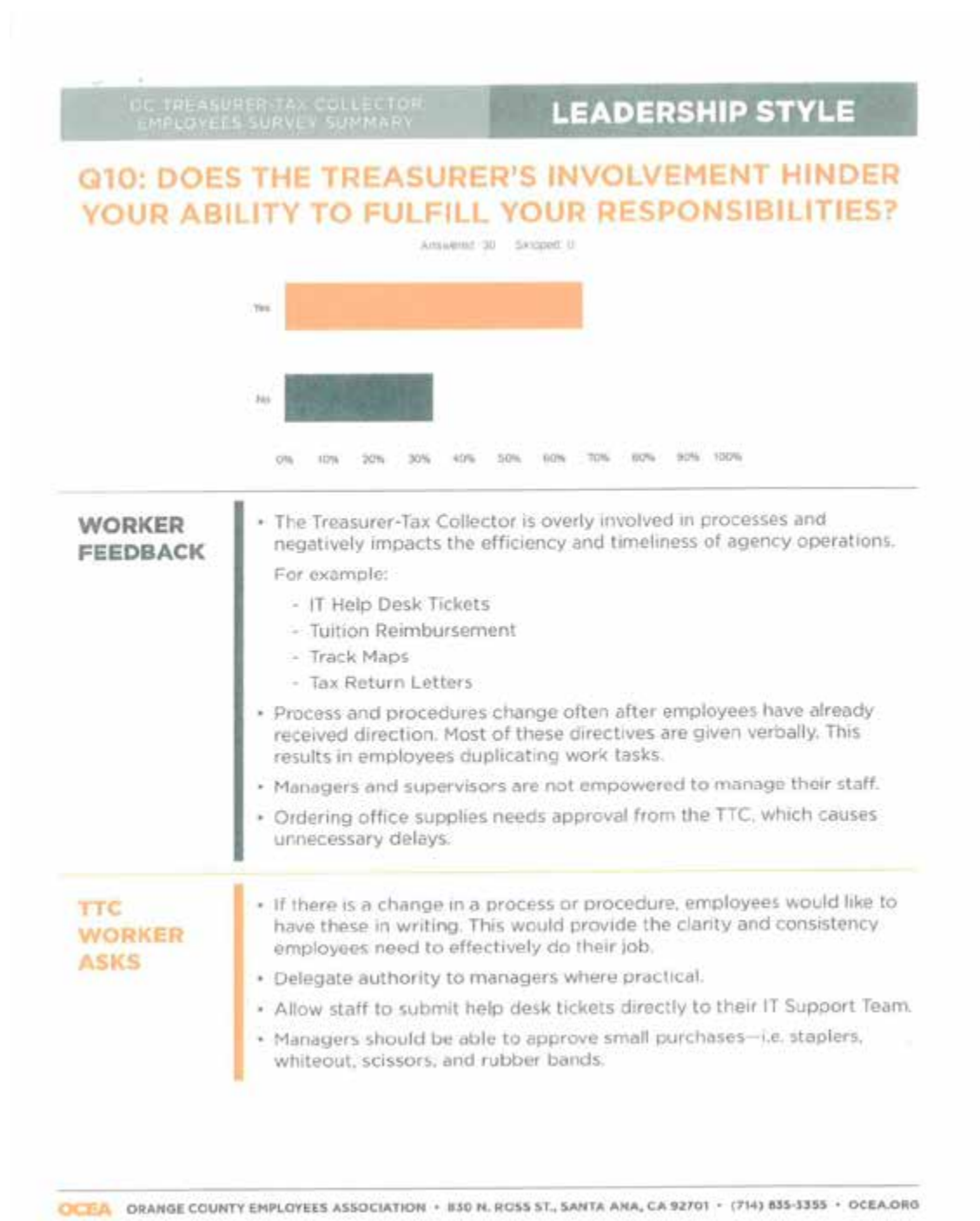
Doug Chaffee
Chair, Orange County Board of Supervisors
Supervisor, Orange County Fourth District

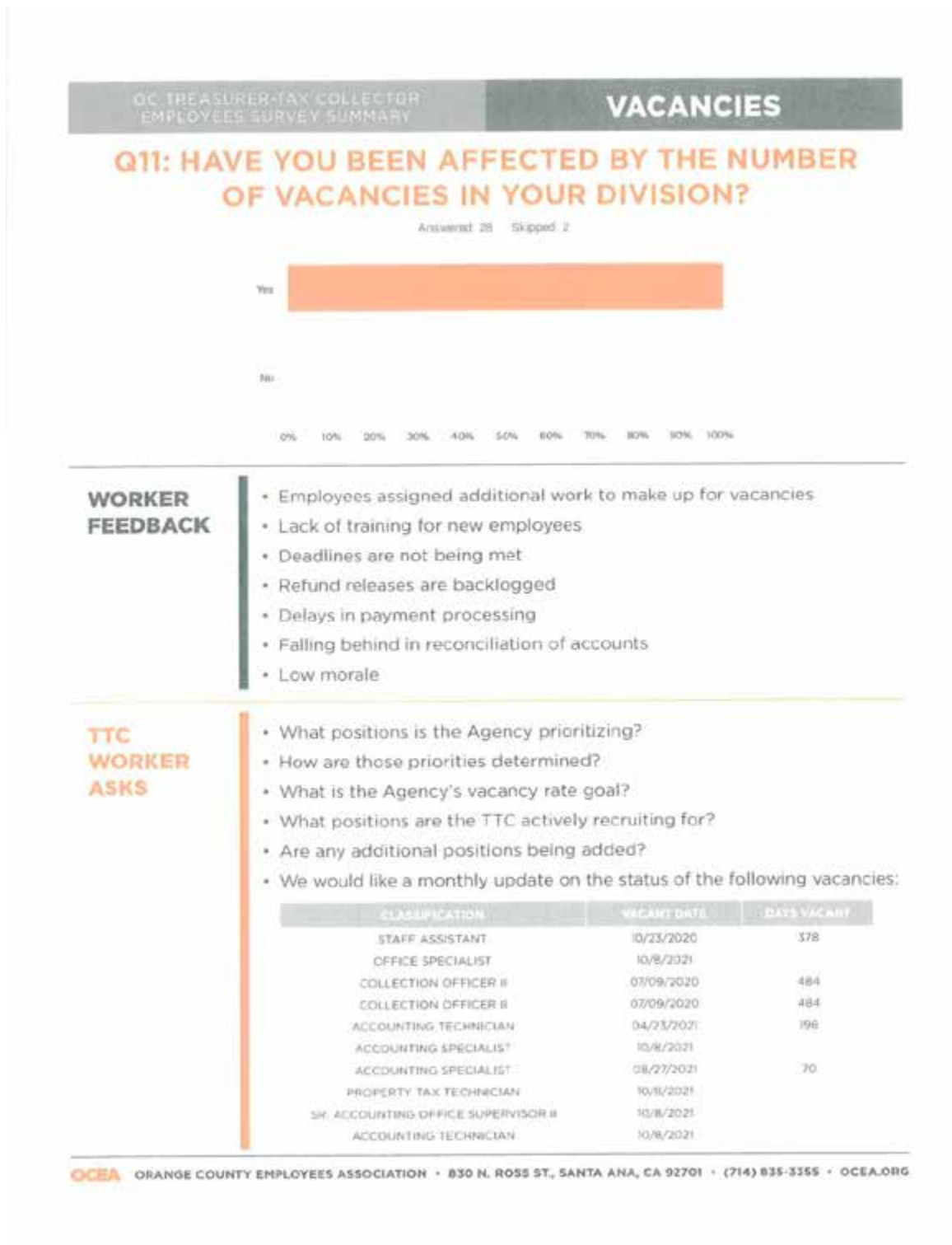
APPENDIX F

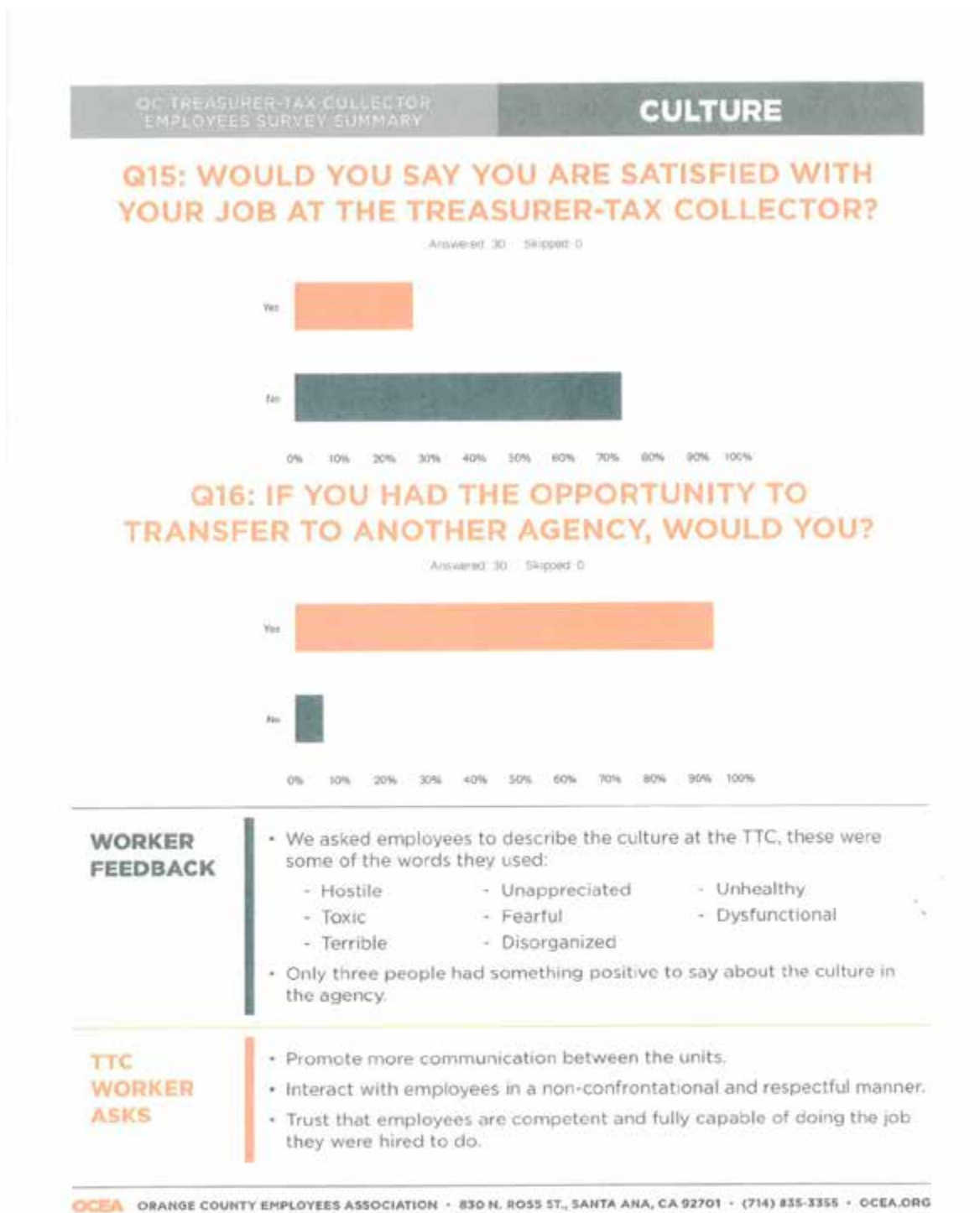
Initial OCEA survey conducted in 2021; 5-page document.

Follow-up OCEA survey conducted in 2025.



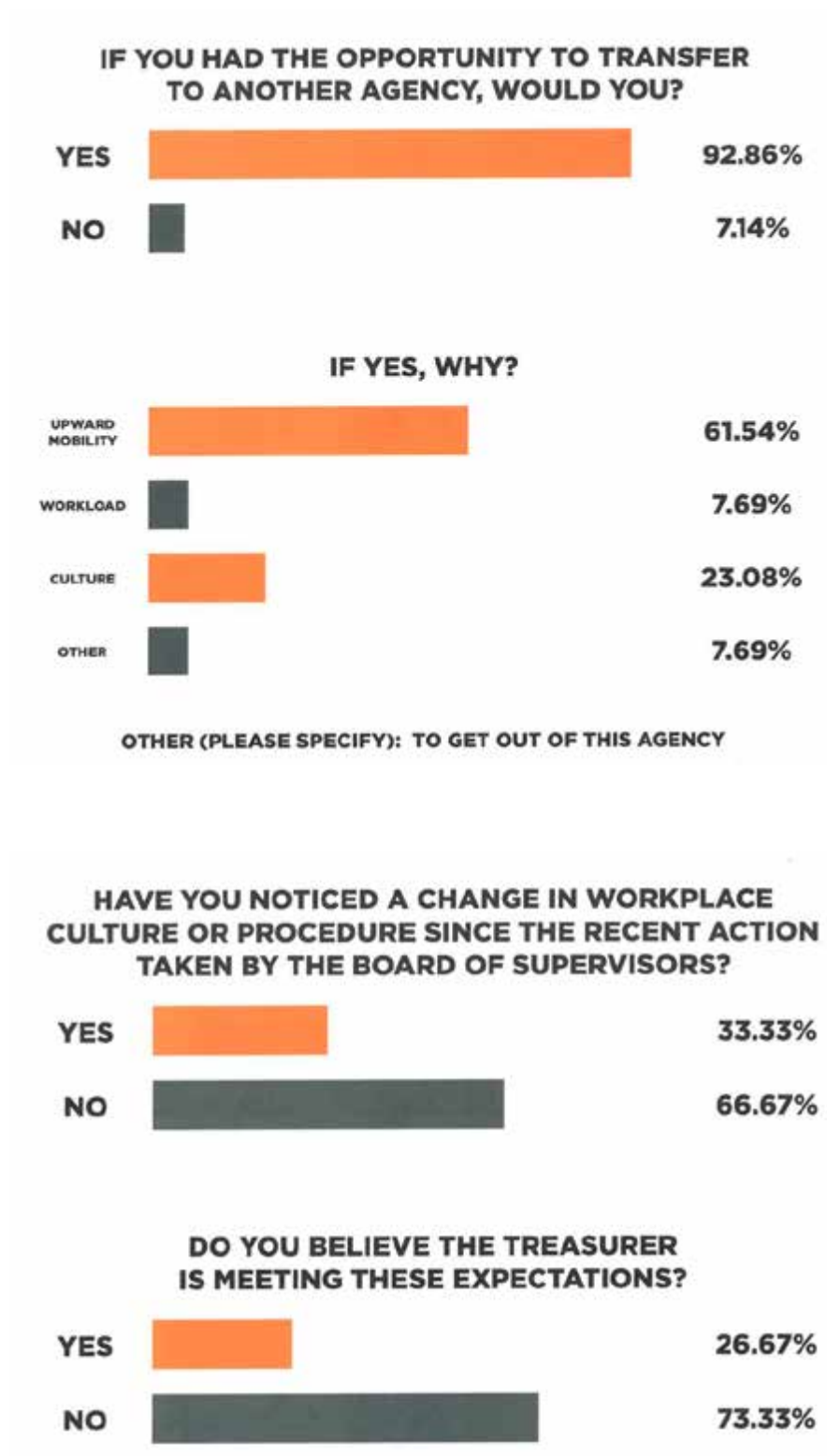








Follow-up OCEA survey conducted in 2025.



DO YOU FEEL COMFORTABLE BRINGING WORKPLACE ISSUES TO MANAGEMENT



IF NO, WHY?



APPENDIX G

Supervisor Moorlach's memorandum regarding proposed OC Charter amendment

532A



07/07/07 AND 10/01/07

MEMORANDUM

SUPERVISOR JOHN M.W. MOORLACH
ORANGE COUNTY BOARD OF SUPERVISORS, SECOND DISTRICT
 18 Civic Center Plaza, 5th Floor, Santa Ana, California 92701 714.834.3220

Date: October 31, 2007
 To: Darlene Bloos, Clerk of the Board
 From: John Moorlach, Vice Chairman *John Moorlach*
 Re: Addition to (11-06-07) Meeting (Supplemental) *by [Signature]*

REQUEST AND SUMMARY:

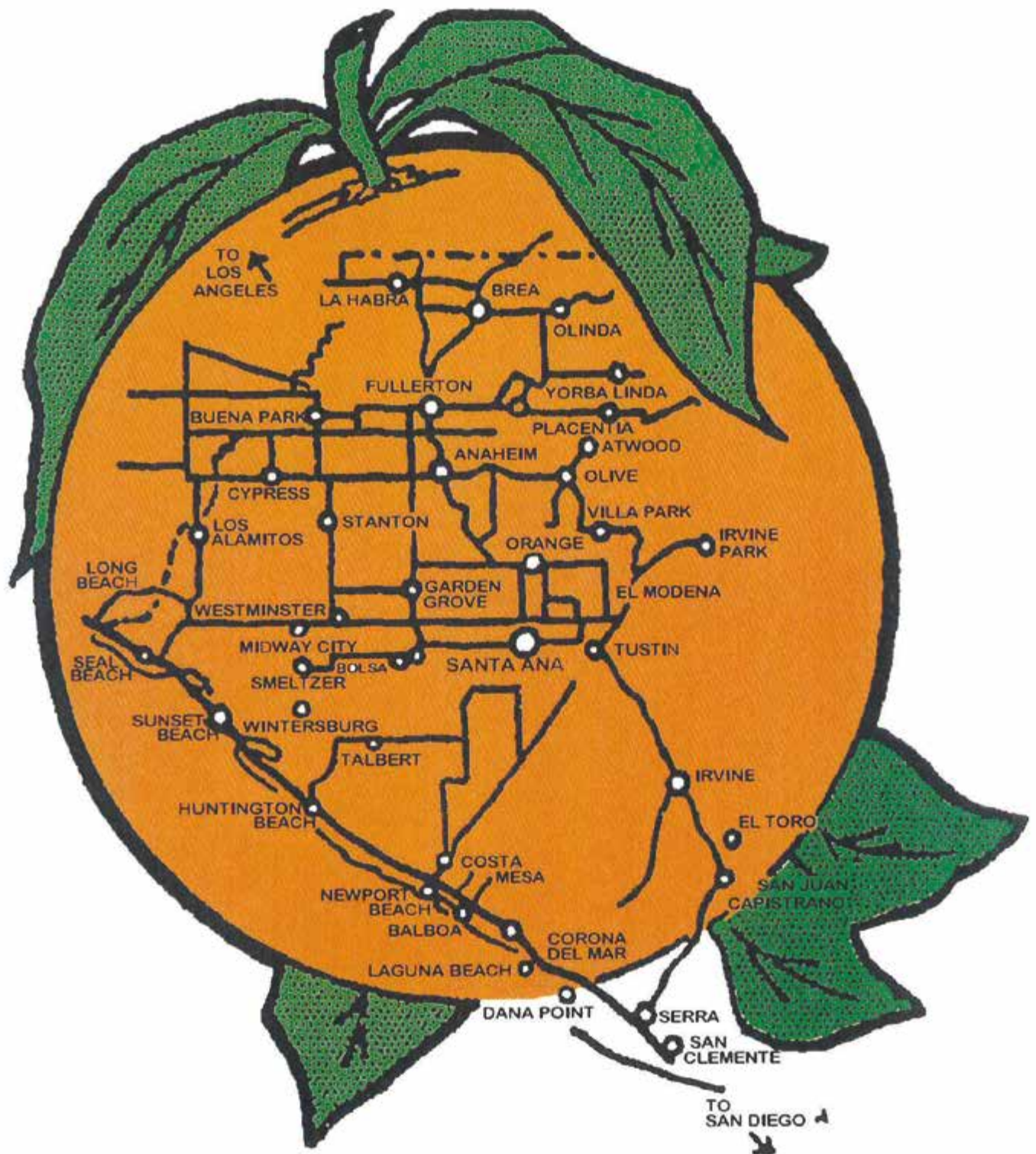
Please place on the agenda the attached proposed County Charter Amendment for placement on the February 2008 ballot. It would, if approved by the voters, allow the Board of Supervisors to remove, by a 4/5 vote of all its members, any County elected officer, other than another supervisor, for cause, which is specifically defined by certain forms of malfeasance in office. Currently, as recent events have demonstrated, the Board of Supervisors has little or no authority to remove an elected County officer who has committed malfeasance in office.

Article XI, section 4(c) of the California constitution provides that a county charter may provide for the election or appointment, and removal, of county officers, including state constitutional officers such as the sheriff. A nearly identical charter provision, passed by the County of San Bernardino, was upheld by the Fourth District Court of Appeal just two years ago in *Petrol v. County of San Bernardino*, 126 Cal. App. 4th 185, 23 Cal. Rptr. 3d 717 (2005). There, the County Sheriff argued that state constitutional officers such as the Sheriff could not be constitutionally removed by the Board of Supervisors, but the Court specifically held that such a removal power was constitutional.

RECOMMENDED ACTIONS:

1. Direct the Registrar of Voters to place the proposed Charter Amendment on the ballot for the election to be held February 5, 2008.
2. Direct the County Council to prepare the ballot title and summary and the impartial analysis of the ordinance, and to forward them to the Registrar of Voters.

Approved to place on the agenda:
Chris Norby
 Supervisor Chris Norby, Chairman



700 Civic Center Drive West, Santa Ana CA 92701
www.ocgrandjury.org