

ML Engineering

1391 N. Third Avenue; Upland, CA 91786
Phone (909) 949-0923 – Fax (909) 946-4813
Email: mlengineering1@aol.com

June 23, 2026

Orange County Board of Supervisors

Distinguished Members of the Board:

Allow me to introduce myself. My name is Mauricio Lopez, and I am a practicing engineer based in Upland, California. I respectfully submit this formal complaint concerning three of your departments: Planning; Fire; and Building and Safety. Please allow me to explain.

My clients, Mr. and Mrs. Hebner, wish to build a private equestrian center at 23411 Via Pajaro, Coto de Caza, for their own personal use and for that of their close friends and family. To that end, in the fall of 2021 they originally retained Ms. Sheryl Moe, AIA, to prepare the submittal documents for the project. In 2022, your Planning Department approved the project under A-PA22-0208 (see attached cover sheet, **Exhibit 1**) as an “accessory” to their home. This approval was granted despite the fact that the project is not on the same lot as the house, nor in the same zoning district: the house sits on a residential lot, while the equestrian center is on a commercial lot.

Although California Residential Code Section 401.4.1 (**Exhibit 2**) categorically exempts residential projects and their accessory structures from soils-report requirements—and the project was approved as a residential accessory—the department not only required a soils report, but also demanded a Storm Water Management Plan (SWMP), a Water Quality Management Plan (WQMP), and a drainage plan. These items are typically addressed under the Green Building mandatory measures, Section 4106.6 (**Exhibit 3**), as part of the required submittal documents.

In addition, the Fire Department approved a site plan that did not meet Fire Code Section 503.1.1 (**Exhibit 4**), which requires fire-engine access to within 150 feet of the rear of the farthest structure. Rather than voiding the approval on account of these inherent defects, the departments spent years attempting to make the “approved” site plan work. Ultimately, they removed the barn building because the required building separation could not be met, and approved only the horse riding arena for construction—after five years of back-and-forth.

Upon learning that they could not build their desired barn, Mr. and Mrs. Hebner sensed that something was seriously wrong and retained me a little over a year ago to obtain the permits for the complete project.

The first thing I did was inform your Building Official (BO), Mr. Hadi Tabatabaee, that the project had been approved in error. The facility is not on the same lot as the house, nor in the same zone (the house is in a residential zone, while the lot where the arena is being built is in a commercial zone); therefore, it cannot properly be considered an accessory to the residence. I then revised the site plan (**Exhibit 5**)—something the departments had debated for five years without success—so that Fire Code Section 503.1.1 was satisfied, which I completed within a couple of days, and I resubmitted the project. The Planning Department approved it under CP25-0021. In my view, the

department used the “Change Plan” (CP) procedure in an attempt to address its earlier error of approving a residential accessory project in a commercial zone, presenting the matter as though the owners had changed their plans.

Rather than acknowledging the correction, your Building Official—citing the change in the Responsible Professional in Charge of the project—voided all previously approved documents and demanded an entirely new set, including a new soils report, a new SWMP, a new WQMP, and new drainage and grading plans. The geotechnical consultant promptly prepared a letter stating, in essence, that the project is virtually the same (see GMU letter, **Exhibit 6**). Although this was submitted months ago, it remains under review by your Grading Department as of the date of this complaint.

The horse riding arena structure that had been approved—and was being reviewed under Building Non-Residential permit BNR24-0199, with only four structural corrections and roughly two and a half pages remaining (**Exhibit 7**)—was revoked. Mr. Tabatabaee stated at the time that the four remaining corrections from BNR24-0199 would simply be transferred to the new plan review. Notwithstanding that statement, the new plan review (BNR25-0248) was returned with 29 pages of corrections and 69 comments—up from four. I find it difficult to view this as anything other than a retaliatory measure.

I would also note that the department’s own permit designation—BNR, for “Building Non-Residential”—confirms that this is not a residential project.

The Fire Department also added a fire-sprinkler requirement to the arena, which is essentially a shade canopy and which had previously been approved without sprinklers. When I attempted to discuss the fire-sprinkler issue, I was cut off by the Fire Marshal, who indicated that he would leave the meeting unless I stopped and instead justified the requirement, suggesting that Mr. Hebner could decide to store several semi-trailers full of hay in the arena. I pointed out that, should such a situation ever arise, the department would have the authority to immediately red-tag the facility for violating its approved use. I also explained that the project was originally budgeted at approximately one million dollars; due to inflation over the six years it has been in review, that figure has risen to roughly 1.5 million dollars, and the project cannot absorb an additional 2.5 million dollars to bring water to the site—an amount that would more than triple the original budget.

Even setting that aside, the fire ordinance, as written, does not apply to this structure, because it requires fire sprinklers only when the “building area” exceeds 5,000 square feet. The Code defines building area as the area within exterior walls (**Exhibit 8**), and this shade structure has no exterior walls. The Fire Marshal responded that his intent was to include everything, regardless of the Code’s definition. Because the ordinance seeks to amend the Code, the Code’s definition of building area would appear to be directly relevant. I respectfully submit that intent and the language actually adopted are two different things, and that the language of the ordinance, as written, must prevail.

Regarding the septic system, as of the date of this complaint it is purportedly under review by the San Diego Regional Water Board for the third time, having been sent back and forth on three prior occasions. We found it necessary to contact the State Water Resources Control Board in Sacramento because Mr. Hinkle of the San Diego board was refusing even to accept the recycled-

water system, stating that he did not have jurisdiction over recycled-water systems. Only after a video conference with the State Board—which directed Mr. Hinkle to accept the project for review and approval—did the matter move forward. Even so, Mr. Hinkle has continued to delay; as of last Friday, he reported that he had not yet had time to review the submittal. This step appears to be critical to the success of the project.

It also remains unclear how your Building Department is able to delegate review of the California Plumbing Code—the enforcement of which is central to its function—to the San Diego Water Board. I have no doubt that the staff at the Water Board are skilled in their respective fields; however, the California Plumbing Code was written for architects and engineers, not for hygienists, geologists, and water-sourcing professionals, who by virtue of their professions are not licensed to review it. Delegating this review may conflict with the California Business and Professions Code, which requires a licensed professional architect and/or engineer to interpret and apply the California building codes.

In closing, I would note that the septic system we are proposing delivers recycled water as its final product, not sewage. Technically, it is not a septic system but a water-recycling system.

My clients' pursuit of happiness—a right recognized in the Declaration of Independence—has been disregarded repeatedly over a period of years, and continues to be. I therefore respectfully ask the Board to direct the Planning, Fire, and Building and Safety departments to cease these obstacles to my clients' rights and to proceed with issuing the permits without further delay.

Thank you for your time and consideration.

Respectfully,

Mauricio Lopez, PE
ML Engineering

ML Engineering

1391 N. Third Avenue, Upland, CA 91786 | (909) 949-0923

EXHIBITS

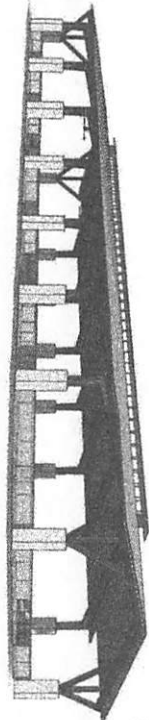
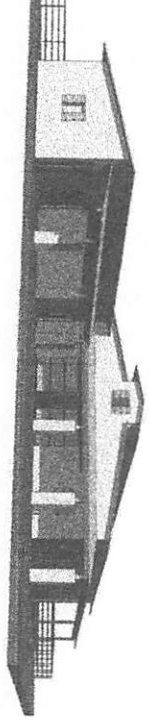
Exhibits 1 through 8

*Submitted in support of the formal complaint to the
Orange County Board of Supervisors*

Re: Hebner Equestrian Center — 23411 Via Pajaro, Coto de Caza, California

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- | | |
|------------------|--|
| Exhibit 1 | Planning Department–approved cover sheet, “Hebner’s Arenas & Barn” (Project A-PA22-0208), bearing the County’s “Conditionally Approved” stamp. |
| <hr/> | |
| Exhibit 2 | California Residential Code, Chapter 4 (Foundations), Section R401.4 and Table R401.4.1 — soils-report / geotechnical-evaluation provisions. |
| <hr/> | |
| Exhibit 3 | California Green Building Standards Code (CALGreen), Residential Mandatory Measures — Section 4.106 site-development requirements. |
| <hr/> | |
| Exhibit 4 | California Fire Code, Section 503.1.1 — fire apparatus access road requirements (150-foot access). |
| <hr/> | |
| Exhibit 5 | Revised Site Plan, Sheet C-1, prepared by ML Engineering (Permit BNR25-0240). |
| <hr/> | |
| Exhibit 6 | GMU Geotechnical review letter dated January 20, 2026, concluding the revisions are minor and the project remains acceptable — 2 pages. |
| <hr/> | |
| Exhibit 7 | OC Public Works / Development Services plan-check correction list (PKG24-0736) — 3 pages. |
| <hr/> | |
| Exhibit 8 | International Building Code, Definitions — “Area, Building” (the area within exterior walls). |

Exhibit-5-

			
SCOPE OF WORK THE CLIENT IS REQUESTING A COMPREHENSIVE PRELIMINARY DESIGN FOR THE PROPOSED BUILDING. THE BUILDING IS TO BE USED AS A BARN AND STORAGE FOR THE CLIENT'S EQUESTRIAN EQUIPMENT. THE BUILDING IS TO BE SITUATED ON A 10-ACRE PARCEL. THE CLIENT WANTS THE BUILDING TO BE A SINGLE-STOREY BUILDING WITH A GABLED ROOF. THE CLIENT WANTS THE BUILDING TO BE CONSTRUCTED WITH A FRAMEWORK OF STEEL BEAMS AND BRACED WITH STEEL STUDS. THE CLIENT WANTS THE BUILDING TO BE PAINTED WITH A LIGHT COLOUR. THE CLIENT WANTS THE BUILDING TO BE SITUATED ON A 10-ACRE PARCEL. THE CLIENT WANTS THE BUILDING TO BE A SINGLE-STOREY BUILDING WITH A GABLED ROOF. THE CLIENT WANTS THE BUILDING TO BE CONSTRUCTED WITH A FRAMEWORK OF STEEL BEAMS AND BRACED WITH STEEL STUDS. THE CLIENT WANTS THE BUILDING TO BE PAINTED WITH A LIGHT COLOUR.			
PHASING SCOPE OF WORK PHASE 1: SITE PREPARATION AND FOUNDATION. PHASE 2: STEEL FRAMEWORK. PHASE 3: ROOFING. PHASE 4: WALLS AND PARTIAL ROOFING. PHASE 5: INTERIOR FINISHES. PHASE 6: EXTERIOR FINISHES. PHASE 7: LANDSCAPING. PHASE 8: UTILITY CONNECTIONS. PHASE 9: FINAL INSPECTION AND HANDOVER.			
PROJECT DATA PROJECT NAME: HEARNER'S ARENAS & BARN PROJECT ADDRESS: 23411 VIA PALAU, COTO DE CAZA, CA 92018 PROJECT TYPE: BARN PROJECT STATUS: PRELIMINARY DESIGN PROJECT START DATE: 10/15/2023 PROJECT END DATE: 10/15/2023			
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LOCATION MAP 			

AO

OCP SUBMITTAL
COVER SHEET

HEARNER'S ARENAS & BARN
23411 VIA PALAU
COTO DE CAZA, CA 92018



Exhibit 2

CHAPTER 4 FOUNDATIONS

User note:

About this chapter: Chapter 4 provides requirements for constructing footings and walls for foundations of wood, masonry, concrete and precast concrete. In addition to a foundation's ability to support the required design loads, this chapter addresses several other factors that can affect foundation performance. These include controlling surface water and subsurface drainage, requiring soil tests where conditions warrant and evaluating proximity to slopes and minimum depth requirements. This chapter also provides requirements to minimize adverse effects of moisture, decay and pests in basements and crawl spaces.

SECTION R401 GENERAL

R401.1 Application. The provisions of this chapter shall control the design and construction of the foundation and foundation spaces for buildings. In addition to the provisions of this chapter, the design and construction of foundations in flood hazard areas as established by Table R301.2 shall meet the provisions of Section R322. Wood foundations shall be designed and installed in accordance with AWC PWF.

Exception: The provisions of this chapter shall be permitted to be used for wood foundations only in the following situations:

1. In buildings that have not more than two floors and a roof.
2. Where interior *basement* and foundation walls are constructed at intervals not exceeding 50 feet (15 240 mm).

Wood foundations in Seismic Design Category D₀, D₁ or D₂ shall be designed in accordance with accepted engineering practice.

R401.2 Requirements. Foundation construction shall be capable of accommodating all loads in accordance with Section R301 and of transmitting the resulting loads to the supporting soil. Fill soils that support footings and foundations shall be designed, installed and tested in accordance with accepted engineering practice.

R401.3 Drainage. Surface drainage shall be diverted to a storm sewer conveyance or other *approved* point of collection that does not create a hazard. *Lots* shall be graded to drain surface water away from foundation walls. The *grade* shall fall not fewer than 6 inches (152 mm) within the first 10 feet (3048 mm).

Exception: Where *lot lines*, walls, slopes or other physical barriers prohibit 6 inches (152 mm) of fall within 10 feet (3048 mm), drains or swales shall be constructed to ensure drainage away from the structure. Impervious surfaces within 10 feet (3048 mm) of the building foundation shall be sloped not less than 2 percent away from the building.

R401.4 Soil tests. Where quantifiable data created by accepted soil science methodologies indicate *expansive soils*, *compressible soils*, shifting soils or other questionable soil characteristics are likely to be present, the *building official*

shall determine whether to require a soil test to determine the soil's characteristics at a particular location. This test shall be done by an *approved agency* using an *approved method*.

R401.4.1 Geotechnical evaluation. In lieu of a complete geotechnical evaluation, the load-bearing values in Table R401.4.1 shall be assumed.

TABLE R401.4.1
PRESUMPTIVE LOAD-BEARING VALUES
OF FOUNDATION MATERIALS^a

CLASS OF MATERIAL	LOAD-BEARING PRESSURE (pounds per square foot)
Crystalline bedrock	12,000
Sedimentary and foliated rock	4,000
Sandy gravel and/or gravel (GW and GP)	3,000
Sand, silty sand, clayey sand, silty gravel and clayey gravel (SW, SP, SM, SC, GM and GC)	2,000
Clay, sandy, silty clay, clayey silt, silt and sandy siltclay (CL, ML, MH and CH)	1,500 ^b

For SI: 1 pound per square foot = 0.0479 kPa.

- a. Where soil tests are required by Section R401.4, the allowable bearing capacities of the soil shall be part of the recommendations.
- b. Where the building official determines that in-place soils with an allowable bearing capacity of less than 1,500 psf are likely to be present at the site, the allowable bearing capacity shall be determined by a soils investigation.

R401.4.2 Compressible or shifting soil. Instead of a complete geotechnical evaluation, where top or subsoils are compressible or shifting, they shall be removed to a depth and width sufficient to ensure stable moisture content in each active zone and shall not be used as fill or stabilized within each active zone by chemical, dewatering or presaturation.

SECTION R402 MATERIALS

R402.1 Wood foundations. Wood foundation systems shall be designed and installed in accordance with the provisions of this code.

Exhibit 3

2025 CALIFORNIA GREEN BUILDING STANDARDS CODE RESIDENTIAL MANDATORY MEASURES, SHEET 1

ML
ENGINEERING

4. BUILDING & CONSTRUCTION
A. PLANNING & DESIGN
B. MATERIALS & RESOURCES
C. ENERGY EFFICIENCY
D. WATER EFFICIENCY
E. INDOOR AIR QUALITY
F. OUTDOOR AIR QUALITY
G. TRANSPORTATION
H. COMMUNITY & SOCIETY
I. OTHER

PROJECT
GIO BAUMEN RESIDENCE
NEW POOL, BATHROOM ADDITION
8815 WILLOW PARK DRIVE, SUITE 100
LOS ANGELES, CA 90048



DATE: JAN 15, 2025
DRAWN: J. SMITH
CHECKED: J. SMITH
PROJECT: 12345
SHEET: GBS-1

CHAPTER 2 GREEN BUILDING SECTION 2.1 GENERAL 2.1.1 SCOPE: The intent of this code is to establish minimum standards for green building practices for all new construction and major renovation projects in California. The code is intended to be used in conjunction with the California Building Standards Code (CBC) and the California Green Building Standards Code (CGBC). 2.1.2 PURPOSE: The purpose of this code is to promote sustainable building practices, reduce environmental impacts, and improve the health and well-being of building occupants. 2.1.3 APPLICABILITY: This code applies to all new construction and major renovation projects in California, regardless of the building type or size.	2.1.4 DEFINITIONS: The following definitions apply to the terms used in this code: 2.1.4.1 Building: A structure or part of a structure that is used for housing, business, industry, or other purposes. 2.1.4.2 Major Renovation: A renovation project that involves the replacement of more than 50% of the building's exterior walls, roof, or structural elements. 2.1.4.3 New Construction: A building project that involves the construction of a new building or the addition of a new wing to an existing building.	2.1.5 STANDARDS: The standards for green building practices are established in the following sections: 2.1.5.1 Planning and Design: This section establishes standards for the planning and design of green buildings, including the selection of sustainable materials and the integration of green building practices into the building process. 2.1.5.2 Materials and Resources: This section establishes standards for the selection and use of sustainable materials and resources, including the use of recycled materials and the reduction of waste. 2.1.5.3 Energy Efficiency: This section establishes standards for the energy efficiency of green buildings, including the use of energy-efficient appliances and the installation of energy-efficient lighting. 2.1.5.4 Water Efficiency: This section establishes standards for the water efficiency of green buildings, including the use of water-efficient fixtures and the installation of water-saving devices. 2.1.5.5 Indoor Air Quality: This section establishes standards for the indoor air quality of green buildings, including the use of low-VOC materials and the installation of mechanical ventilation systems. 2.1.5.6 Outdoor Air Quality: This section establishes standards for the outdoor air quality of green buildings, including the use of low-VOC materials and the installation of air filtration systems. 2.1.5.7 Transportation: This section establishes standards for the transportation of green buildings, including the use of low-carbon transportation methods and the installation of bike racks. 2.1.5.8 Community and Society: This section establishes standards for the community and society of green buildings, including the use of sustainable building practices and the promotion of green building practices. 2.1.5.9 Other: This section establishes standards for other green building practices, including the use of sustainable building practices and the promotion of green building practices.
SECTION 2.2 MATERIALS AND RESOURCES 2.2.1 SCOPE: This section establishes standards for the selection and use of sustainable materials and resources, including the use of recycled materials and the reduction of waste. 2.2.2 PURPOSE: The purpose of this section is to promote sustainable building practices, reduce environmental impacts, and improve the health and well-being of building occupants. 2.2.3 APPLICABILITY: This section applies to all new construction and major renovation projects in California, regardless of the building type or size.	2.2.4 DEFINITIONS: The following definitions apply to the terms used in this section: 2.2.4.1 Recycled Content: The percentage of a material that is made from recycled materials. 2.2.4.2 Recycled Material: A material that is made from recycled materials. 2.2.4.3 Recycled Component: A component of a material that is made from recycled materials.	2.2.5 STANDARDS: The standards for the selection and use of sustainable materials and resources are established in the following sections: 2.2.5.1 Recycled Content: This section establishes standards for the recycled content of materials, including the use of materials with a minimum of 10% recycled content. 2.2.5.2 Recycled Material: This section establishes standards for the use of recycled materials, including the use of recycled materials in the construction of buildings. 2.2.5.3 Recycled Component: This section establishes standards for the use of recycled components, including the use of recycled components in the construction of buildings.
SECTION 2.3 ENERGY EFFICIENCY 2.3.1 SCOPE: This section establishes standards for the energy efficiency of green buildings, including the use of energy-efficient appliances and the installation of energy-efficient lighting. 2.3.2 PURPOSE: The purpose of this section is to promote sustainable building practices, reduce environmental impacts, and improve the health and well-being of building occupants. 2.3.3 APPLICABILITY: This section applies to all new construction and major renovation projects in California, regardless of the building type or size.	2.3.4 DEFINITIONS: The following definitions apply to the terms used in this section: 2.3.4.1 Energy-Efficient Appliance: An appliance that meets the energy efficiency requirements of the California Energy Commission. 2.3.4.2 Energy-Efficient Lighting: Lighting that meets the energy efficiency requirements of the California Energy Commission.	2.3.5 STANDARDS: The standards for the energy efficiency of green buildings are established in the following sections: 2.3.5.1 Energy-Efficient Appliances: This section establishes standards for the use of energy-efficient appliances, including the use of appliances that meet the energy efficiency requirements of the California Energy Commission. 2.3.5.2 Energy-Efficient Lighting: This section establishes standards for the use of energy-efficient lighting, including the use of lighting that meets the energy efficiency requirements of the California Energy Commission.
SECTION 2.4 WATER EFFICIENCY 2.4.1 SCOPE: This section establishes standards for the water efficiency of green buildings, including the use of water-efficient fixtures and the installation of water-saving devices. 2.4.2 PURPOSE: The purpose of this section is to promote sustainable building practices, reduce environmental impacts, and improve the health and well-being of building occupants. 2.4.3 APPLICABILITY: This section applies to all new construction and major renovation projects in California, regardless of the building type or size.	2.4.4 DEFINITIONS: The following definitions apply to the terms used in this section: 2.4.4.1 Water-Efficient Fixture: A fixture that meets the water efficiency requirements of the California Water Conservation Council. 2.4.4.2 Water-Saving Device: A device that is designed to reduce water consumption.	2.4.5 STANDARDS: The standards for the water efficiency of green buildings are established in the following sections: 2.4.5.1 Water-Efficient Fixtures: This section establishes standards for the use of water-efficient fixtures, including the use of fixtures that meet the water efficiency requirements of the California Water Conservation Council. 2.4.5.2 Water-Saving Devices: This section establishes standards for the use of water-saving devices, including the use of devices that are designed to reduce water consumption.

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California Fire Code 2025

Adds With Amendments
International Fire Code 2024 (IFC 2024)

Code Compare

PART I ADMINISTRATIVE

Chapter 1 Administration

Chapter 2 Definitions

PART II GENERAL SAFETY PROVISIONS

Chapter 3 General Requirements

Chapter 4 Emergency Planning and Preparedness

PART III BUILDING AND EQUIPMENT DESIGN FEATURES

Chapter 5 Fire Service Features

501 General

502 Definitions

503 Fire Apparatus Access Roads

504 Access to Building Openings and Roofs

505 Premises Identification

506 Key Boxes

507 Fire Protection Water Supplies

508 Fire Command Center

509 Fire Protection and Utility Equipment Identification and Access

510 Emergency Responder Communications Enhancement Systems

503.1 Where Required

Fire apparatus access roads shall be provided and maintained in accordance with Sections 503.1.1 through 503.1.3.

Exhibit - 4

503.1.1 Buildings and Facilities

Diagram

Approved fire apparatus access roads shall be provided for every facility, building or portion of a building hereafter constructed or moved into or within the jurisdiction. The fire apparatus access road shall comply with the requirements of this section and shall extend to within 150 feet (45 720 mm) of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility.

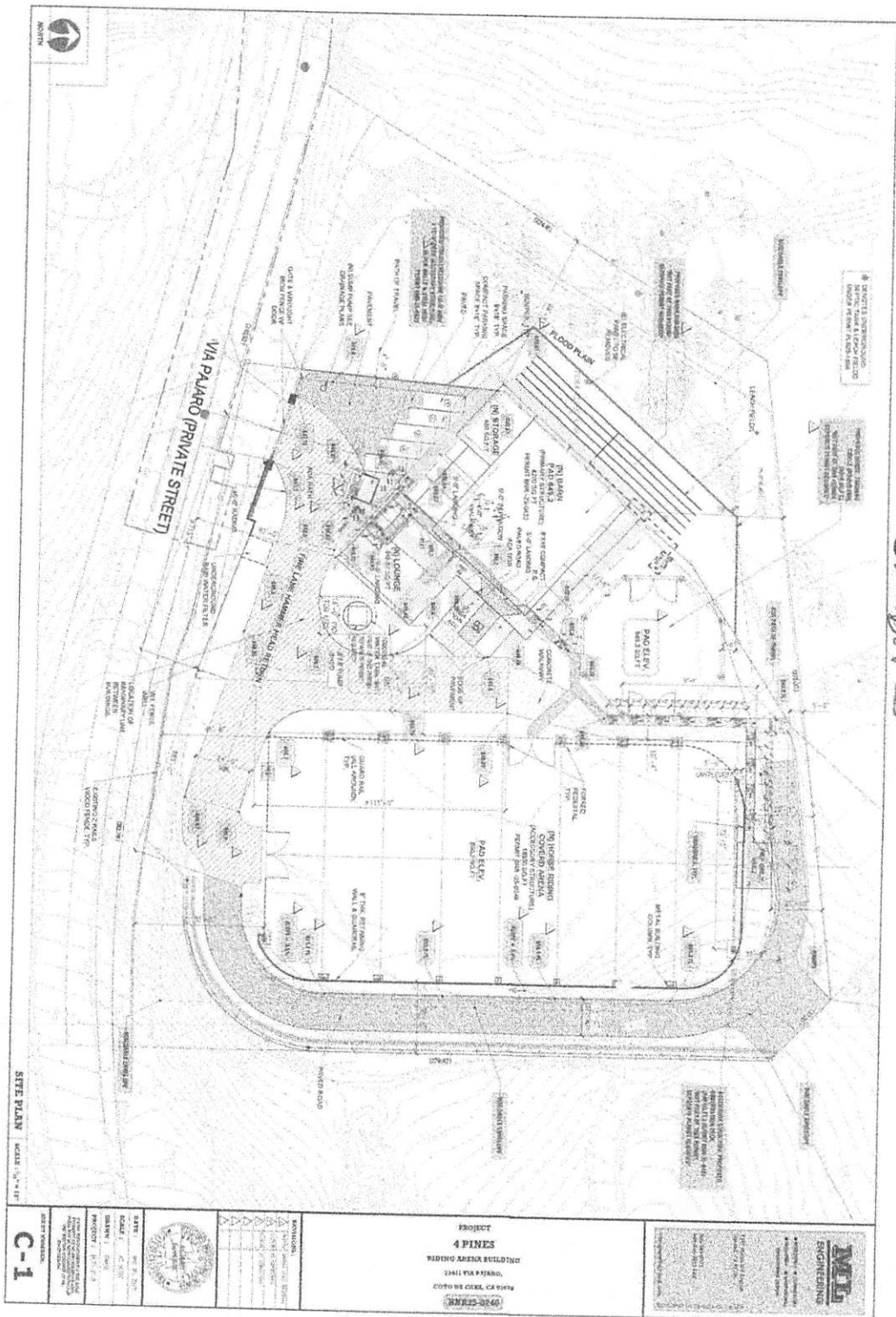
Exceptions:

1. The fire code official is authorized to increase the dimension of 150 feet (45 720 mm) where any of the following conditions occur:
 - 1.1. The building is equipped throughout with an approved automatic sprinkler system installed in accordance with Section 903.3.1.1, 903.3.1.2 or 903.3.1.3.
 - 1.2. Fire apparatus access roads cannot be installed because of location on property, topography, waterways, nonnegotiable grades or other similar conditions, and an approved alternative means of fire protection is provided.
 - 1.3. There are not more than two Group R-3 or Group U occupancies.
2. Where approved by the fire code official, fire apparatus access roads shall be permitted to be exempted or modified for solar photovoltaic power generation facilities.

UpCodes Diagram (1)

Primary
Fire Apparatus Access Roads

Exhibit 5



SITE PLAN SCALE: 1" = 10'

C-1

DATE: 08/10/2010
 SCALE: 1" = 10'
 PROJECT: 4 PINES
 DRAWN BY: J. L. [illegible]
 CHECKED BY: [illegible]
 APPROVED BY: [illegible]



NO.	DESCRIPTION	DATE
1	ISSUED FOR PERMIT	08/10/2010
2	REVISION	
3	REVISION	

PROJECT
4 PINES
 BUILDING AREA BUILDING
 1111 VIA PAJARITO, CA 94024
 415-962-4600

MLJ ENGINEERS
 1111 VIA PAJARITO, CA 94024
 415-962-4600
 www.mljengineers.com

Exhibit 4-①



January 20, 2026

Mr. and Mrs. Hebner
23211 Pradera Road
Trabuco Canyon, CA 92679

GMU Project 21-091-00
Permit PA22-0208

Subject: Geotechnical Review of Updated Precise Grading Plans, Hebner
Equestrian Center Phase 1, Coto de Caza, Orange County, California

References: Listed on Page 3

Dear Mr. and Mrs. Hebner:

GMU has completed a geotechnical review of the updated precise grading plan prepared by ML Engineering (reference 1). The updated plan can be seen in detail on the reference (1) plans, and are summarized as follows:

- Previously reviewed plans were prepared by Huitt Zollars
- Reconfiguration of the site access driveway and fire truck turn around
- Addition of parking stalls
- Shifted the proposed barn pad
- Addition of a water tank pad
- Minimal grade changes to accommodate the updates above

Based on our review, the revisions are relatively minor from a geotechnical perspective. The revised precise grading is still considered to be grossly and surficially stable. All the geotechnical recommendations contained in GMU's referenced reports remain applicable, and the precise grade revisions are acceptable from a geotechnical perspective.

Exhibit 6 - (2)

Mr. and Mrs. Hebner

Precise Grade Plan Review, Proposed Hebner Stables, Phase 1, Coto de Caza, CA

GMU

Please do not hesitate to contact us if you have any questions regarding this letter.



Respectfully submitted,

A handwritten signature in black ink, appearing to read "Katie Farrington".

Katie Farrington, M.Sc., PG, CEG 2611
Senior Engineering Geologist



A handwritten signature in black ink, appearing to read "Mike Moscrop".

Mike Moscrop, M.Sc., PE, GE 2540
President/Principal Geotechnical Engineer

cc:

ML Engineering

Attn: Mr. Mauricio Lopez (electronic copy)

ACT1 Construction

Attn: Mr. Ryan McGlynn

County of Orange (electronic copy)

Exhibit 7-1

#	Review	Category	Comment	Applicant Response	Status	File Name & Page
			11B. Accessibility review will be completed at time of resubmittal. Additional corrections may follow.			
2.043	Building & Safety Review-PKG24-0736 Dorothy Leever	Non-Residential Plan Check List	Structural Corrections Comment dated 4-17-25: Canopy B - The spacing of 3.69" at framing member P1 and P2 has been verified. Revise roof framing plan to specify 2.5' spacing for framing member type P3 per ZJS (first submittal) calculations page 11. See new red marks on sheet S-S1.3 Comment dated 12-20-24: Revise sheet S-S1.3 to specify spacing of the purlins P1, P2, and P3 per ZJS calculations page 7, 10, and 11. Previous comment: Canopy B - Clarify if the roof trusses shown in detail C/S5.2 are to be submitted on shop drawings as a deferred submittal, or if to be constructed on site.	See attached letter response PKG24-0736 PCC2 response 25.02.19 A_E.pdf	Required	
2.064	Building & Safety Review-PKG24-0736	Non-Residential Plan Check List	Structural Corrections Comment dated 4-17-25: See new red marks at detail 2/S3.2 - Provide plan view detail of these two footings to show how		Required	

#	Review	Category	Comment	Applicant Response	Status	File Name & Page
	Dorothy Leever		they will be connected. Include rebar dowels at concrete pour joints Previous comment: Canopy A foundation design by Solid Structures - See red marks on sheet S2.1 - Provide details 14A, 14B and 14C/S3.1 and include the continuous retaining wall footing with the pilaster footing to show how they will be constructed together. Provide additional connection details as needed.			
2.066	Building & Safety Review- PKG24-0736 Dorothy Leever	Non-Residential Plan Check List	Structural Corrections Canopy A Foundation design by Solid Structures - Revise pilaster design A, B and C (calcs pages 11-13 and 20-22 of 54) to include height of retained soil using design parameters provided in soils report by GMU dated 9-14-23 page 16-17. EFP 40pcf for level backfill, coefficient of friction 0.35 and passive resistance 320pcf. Update pilaster details accordingly.		Required	
2.067	Building & Safety Review- PKG24-0736 Dorothy Leever	Non-Residential Plan Check List	Structural Corrections Canopy A foundation design by Solid Structures - Provide calculations for pilaster type C as shown in detail 15C/S3.1. Include retained height of soil. The detail and calculations will be checked	See attached letter response PKG24-0736 PCC2 response 25.02.19 A_E.pdf	Required	

#	Review	Category	Comment	Applicant Response	Status	File Name & Page
			at time of resubmittal. Additional corrections may follow.			
3.002	Building & Safety Review- PKG24-0736 Dorothy Leever	Geotechnical/Geology Check List	Geotechnical/Geology - Permit Required Comments Reminder at final plans: Final foundation plans and details for Canopy A (plan by Solid Structures) and Canopy B (plan by FCP and calcs by ZJS Engineers) are to be reviewed, stamped and signed by Geotechnical Consultant.	Plans stamped and signed by Geo Consult GMU	Required	

- [BF] AIR-IMPERMEABLE INSULATION.** An insulation having an air permeance equal to or less than $0.02 \text{ l/s} \times \text{m}^2$ at 75 pa pressure differential tested in accordance with ASTM E283 or ASTM E2178.
- [BG] AIR-INFLATED STRUCTURE.** A structure that uses air-pressurized membrane beams, arches or other elements to enclose space. Occupants of such a structure do not occupy the pressurized area used to support the structure.
- [BG] AIR-SUPPORTED STRUCTURE.** A structure wherein the shape of the structure is attained by air pressure and occupants of the structure are within the elevated pressure area. *Air-supported structures* are of two basic types:
- [BE] AISLE.** An unenclosed *exit access* component that defines and provides a path of egress travel.
- [BE] AISLE ACCESSWAY.** That portion of an *exit access* that leads to an *aisle*.
- [F] ALARM NOTIFICATION APPLIANCE.** A *fire alarm system* component such as a bell, horn, speaker, light or text display that provides audible, tactile or visible outputs, or any combination thereof.
- [F] ALARM SIGNAL.** A signal indicating an emergency requiring immediate action, such as a signal indicative of fire.
- [F] ALARM VERIFICATION FEATURE.** A feature of *automatic* fire detection and alarm systems to reduce unwanted alarms wherein *smoke detectors* report alarm conditions for a minimum period of time, or confirm alarm conditions within a given time period, after being automatically reset, in order to be accepted as a valid alarm-initiation signal.
- [BS] ALLOWABLE STRESS DESIGN.** A method of proportioning structural members, such that elastically computed stresses produced in the members by *nominal loads* do not exceed *specified* allowable stresses (also called "working stress design").
- [A] ALTERATION.** Any construction or renovation to an *existing structure* other than *repair* or *addition*.
- [BE] ALTERNATING TREAD DEVICE.** A device that has a series of steps between 50 and 70 degrees (0.87 and 1.22 rad) from horizontal, usually attached to a center support rail in an alternating manner so that the user does not have both feet on the same level at the same time.
- [BG] AMBULATORY CARE FACILITY.** Buildings or portions thereof used to provide medical, surgical, psychiatric, nursing or similar care on a less than 24-hour basis to persons who are rendered *incapable of self-preservation* by the services provided or staff has accepted responsibility for care recipients already incapable.
- [BG] ANCHOR BUILDING.** An exterior perimeter building of a group other than H having direct access to a *covered* or *open mall building* but having required *means of egress* independent of the mall.
- [BS] ANCHORED MASONRY VENEER.** *Veneer* secured with *approved* mechanical fasteners to an *approved* backing.
- [BF] ANNULAR SPACE.** The opening around the penetrating item.
- [F] ANNUNCIATOR.** A unit containing one or more indicator lamps, alphanumeric displays or other equivalent means in which each indication provides status information about a circuit, condition or location.
- [A] APPROVED.** Acceptable to the *building official*.
- [A] APPROVED AGENCY.** An established and recognized agency that is regularly engaged in conducting tests, furnishing inspection services or furnishing product certification where such agency has been *approved* by the *building official*.
- [BS] APPROVED FABRICATOR.** An established and qualified person, firm or corporation *approved* by the *building official* pursuant to Chapter 17 of this code.
- [A] APPROVED SOURCE.** An independent person, firm or corporation, *approved* by the *building official*, who is competent and experienced in the application of engineering principles to materials, methods or systems analyses.
- [BS] AREA (for masonry).**
- Gross cross-sectional.** The *area* delineated by the out-to-out *specified dimensions* of *masonry* in the plane under consideration.
- Net cross-sectional.** The *area* of *masonry units*, grout and mortar crossed by the plane under consideration based on out-to-out *specified dimensions*.
- [BG] AREA, BUILDING.** The area included within surrounding *exterior walls*, or *exterior walls* and *fire walls*, exclusive of vent *shafts* and *courts*. Areas of the building not provided with surrounding walls shall be included in the *building area* if such areas are included within the horizontal projection of the roof or floor above.
- [BE] AREA OF REFUGE.** An area where persons unable to use *stairways* can remain temporarily to await instructions or assistance during emergency evacuation.
- [BE] AREA OF SPORT ACTIVITY.** That portion of an indoor or outdoor space where the play or practice of a sport occurs.
- [BG] AREAWAY.** A subsurface space adjacent to a building open at the top or protected at the top by a grating or guard.
- ASSEMBLY SEATING, MULTILEVEL.** See "Multilevel assembly seating."
- [BG] ATRIUM.** A vertical space that is closed at the top, connecting two or more *stories* in Group I-2 and I-3 occupancies or three or more *stories* in all other occupancies.
- [BG] ATTIC.** The space between the ceiling framing of the top *story* and the underside of the roof.
- [F] AUDIBLE ALARM NOTIFICATION APPLIANCE.** A notification appliance that alerts by the sense of hearing.
- [F] AUTOMATIC.** As applied to fire protection devices, a device or system providing an emergency function without the necessity for human intervention and activated as a result of a predetermined temperature rise, rate of temperature rise or combustion products.