

February 23, 2026  
Project No. CLA.000IR23328

Mr. Dan Weerasekera, Hazardous Materials Specialist III  
Mr. Soheil Afshari, PhD, PE, PMP, Senior Civil Engineer  
Orange County Health Care Agency  
Solid Waste – Local Enforcement Agency  
Environmental Health Division  
1241 East Dyer Road, Suite #120  
Santa Ana, California 92705

**Subject:       Modification of Truck Hauling Route for Clean Imported Soil for  
                  Mabury Residential Development  
                  Rio Santiago Site  
                  6145 East Santiago Canyon Road  
                  Orange, California**

On behalf of Milan REI X, LLC (Milan), we are pleased to present this letter to the Orange County Health Care Agency (OCHCA) Environmental Health Division, acting as the Solid Waste – Local Enforcement Agency (LEA), summarizing the revised truck hauling route for soil for the Mabury residential development at the Rio Santiago site (referred to herein as the “Site”), located at 6145 East Santiago Canyon Road in Orange, California (Figure 1). The trucking hauling route will be used to transport clean imported fill from an offsite source area to the approximately 10.9-acre planned Mabury residential development located north and adjacent to the Site.

## **MABURY RESIDENTIAL DEVELOPMENT**

The Mabury residential development will consist of 22 single-family homes and access roads on Parcel 1 of Parcel Map 2021-187, located north of the Site across Santiago Creek. The Mabury development, which has been approved by the City of Orange, requires the import of approximately 130,000 cubic yards (CY) of clean imported fill material, which will be sourced by the developer, D.R. Horton, and transported to the Mabury residential development. D.R. Horton is planning to transport the fill material via a truck hauling route through the Site and then onto the Mabury residential development by way of a temporary land bridge, which has been approved by the United States Army Corps of Engineers. The temporary land bridge was to be constructed from clean, imported fill material, but will now be constructed from soil excavated from the Mabury residential development, as approved by the Santa Ana Regional Water Quality Control Board (SARWQCB) in an email correspondence dated November 19, 2025<sup>1</sup>. The planned extent of the temporary land bridge is depicted in green cross-hatch in the attached exhibit.

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<sup>1</sup>Ybarra, Pamela (SARWQCB), “RE: Clean Fill for Bridge.” Email Received by Diane Scioli (Milan) November 19, 2025.

## MODIFIED TRUCK HAULING ROUTE

As previously requested in a letter<sup>2</sup> to the LEA and subsequently conditionally approved by the SARWQCB<sup>3</sup> and LEA<sup>4</sup>, the proposed truck hauling route would require relocation of approximately 13,155 cubic yards (CY) of soil from Stockpile H, located on the Site, to a different area on the same Site; however, D.R. Horton has since revised its plans for the proposed haul route such that alteration of Stockpile H (or any other on-site stockpiles or soil mounds) is no longer required. The revised soil haul route is depicted in the attached exhibit. D.R. Horton will implement industry best management practices (BMPs) during earthwork and soil hauling activities, which are anticipated to begin on March 1, 2026, and take approximately four months to complete.

The modified truck hauling route described herein was approved by the SARWQCB in an email<sup>5</sup> dated February 23, 2026 (see attached).

## ENGINEERING CONTROLS

Municipal water will be continuously applied, as needed, to disturbed soils during loading, transportation, and emplacement to mitigate airborne fugitive dust emissions. In addition, shaker/track plates will be installed on the Rio Santiago Site side of the proposed land bridge to mitigate soil transfer originating from the Site to the planned Mabury residential site. Shaker/track plates will also be installed on the Rio Santiago Site near the truck exit to Santiago Canyon Road.

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<sup>2</sup>Verdantas, 2025, "Requested Alteration of Stockpile H to Accommodate Truck Hauling Route For Proposed Mabury Residential Development, Rio Santiago Site, 6145 East Santiago Canyon Road, Orange, California." December 10.

<sup>3</sup>SARWQCB, 2025, "Comments on Requested Alteration of Stockpile H to Accommodate Truck Hauling Route for Proposed Mabury Residential Development – Rio Santiago, 6145 E. Santiago Canyon Road, Orange, CA (Global ID No. T10000023109, CR Site ID No. 2080228). December 23.

<sup>4</sup>OCHCA Environmental Health Division, 2026, "Requested Alteration of Stockpile H to Accommodate Truck Hauling Route for Proposed Mabury Residential Development dated December 10, 2025 for Rio Santiago Disposal Site located at 6145 E. Santiago Canyon Road, Orange, CA (SWIS No. 30-AB-0472)." January 9.

<sup>5</sup>Ybarra, Pamela (SARWQCB), "RE: Letter for Modification of Truck Hauling Route at Rio Santiago Site." Email received by Michael Priestaf (Verdantas) February 23, 2026.

If you have any questions, concerns, or comments regarding the information presented in this letter, please do not hesitate to contact the undersigned at the phone numbers and/or email addresses listed below.

Sincerely,

Verdantas Inc.

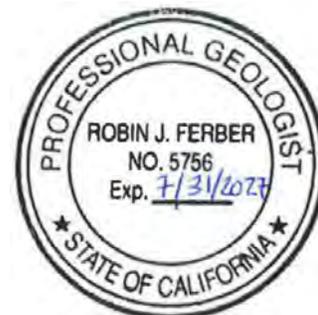
*Michael Priestaf*

Michael Priestaf, MS, PG  
Senior Project Geologist  
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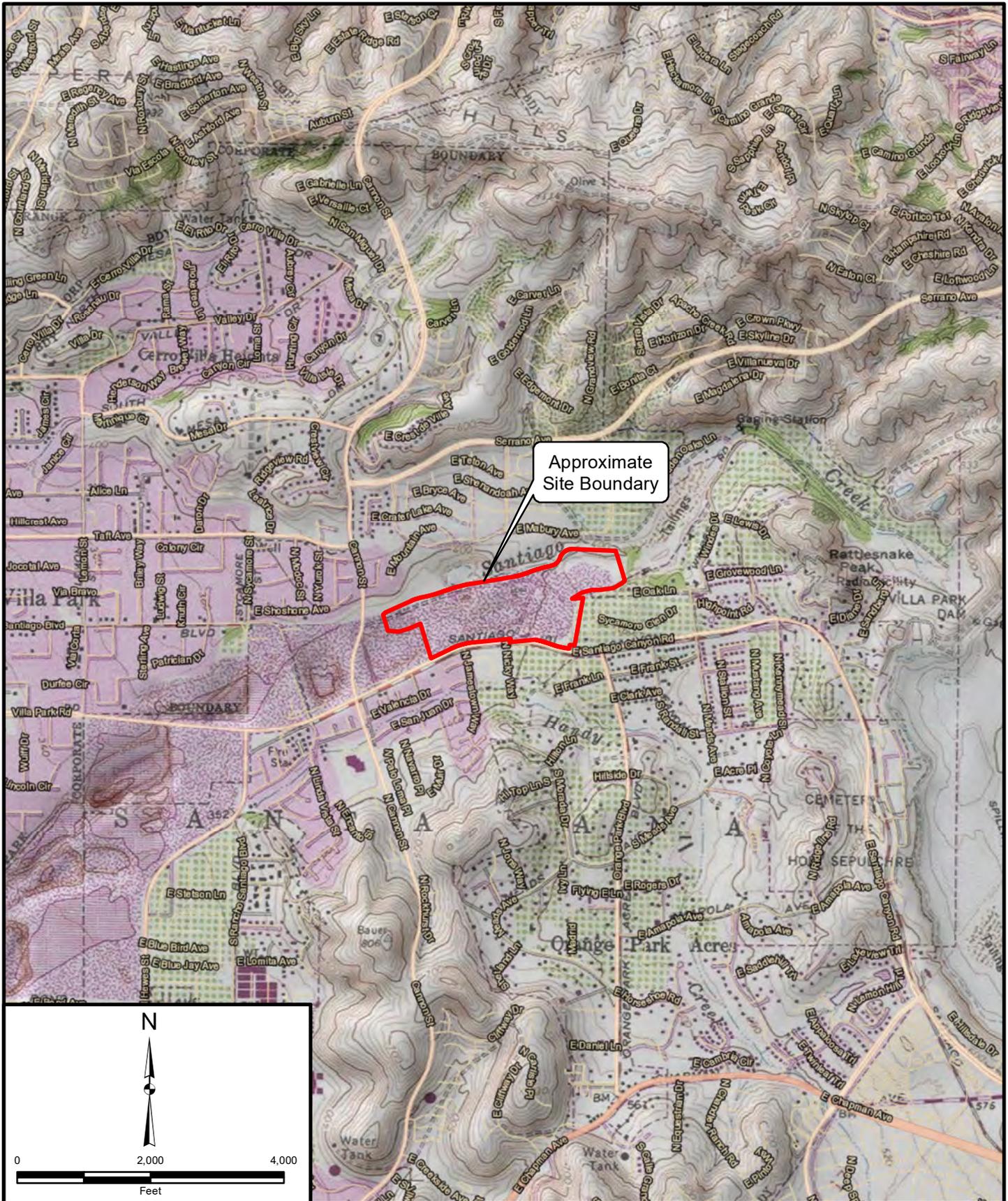


MJP/RJF/jn

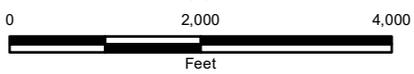
Attachments:

Figure 1 – Site Location Map  
Exhibit A  
SARWQCB Approval Email

Copies: Darwin Cheng, Orange County Environmental Health Division  
Lauren Robinson, Orange County Environmental Health Division  
Tamara Escobedo, Orange County Environmental Health Division  
Shyamala Rajagopal, Orange County Environmental Health Division  
Joscelynn Gadzinski, Office of County Counsel  
Pamela Ybarra, PE, Santa Ana Regional Water Quality Control Board  
Christopher Nichelson, President, Milan Capital Management, Inc.  
Diane Scioli, Construction Manager, Milan Capital Management, Inc.  
Peter Duchesneau, Esq., Partner, Manatt, Phelps & Phillips, LLP  
David McGrath, Counsel, Manatt, Phelps & Phillips, LLP



Approximate Site Boundary



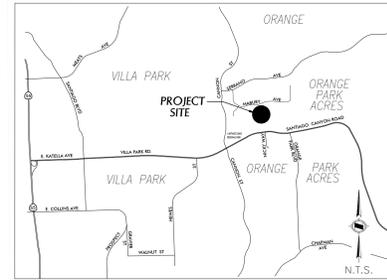
Project: CL.A.000IR23328	Eng/Geol: RJF/MJP
Scale: 1" = 2,000'	Date: May 2024
Base Map: ESRI ArcGIS Online 2022	
Author: (mmurphy)	

# SITE LOCATION MAP

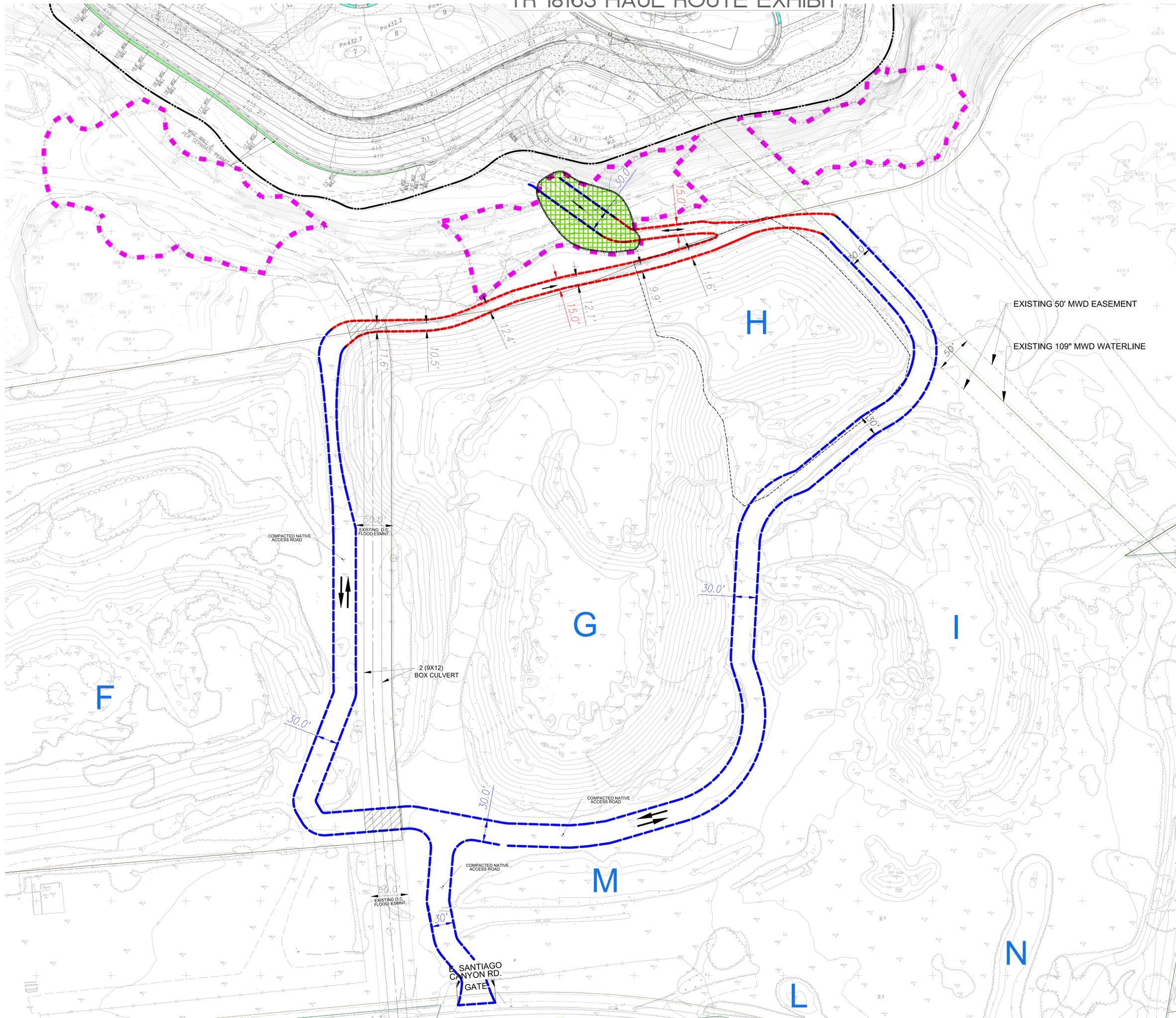
6145 East Santiago Canyon Road  
City of Orange, Orange County, California

**FIGURE 1**

# TR 18163 HAUL ROUTE EXHIBIT



VICINITY MAP



**NOTE:**

SANTIAGO CREEK CHANNEL IS DESIGNATED AS E08, PER THE COUNTY OF ORANGE FACILITY MAP.

**LEGEND**

- TR. BOUNDARY
- CONSERVATION EASEMENT
- PROPOSED HAUL ROUTE (15' WIDE)
- PROPOSED HAUL ROUTE (30' WIDE)
- TEMPORARY EARTH ACCESS ROAD FOR CONSTRUCTION PURPOSE



PREPARED BY:  
**HUNSAKER & ASSOCIATES**  
 IRVINE, CA  
 PLANNING • ENGINEERING • SURVEYING  
 701 SOUTH PARKER STREET, SUITE 5200  
 ORANGE, CA 92668

PREPARED FOR:  
**MILAN REI X, LLC**  
 701 SOUTH PARKER STREET, SUITE 5200  
 ORANGE, CA. 92668

## RE: Letter for Modification of Truck Hauling Route at Rio Santiago Site

Reply Reply All Forward ...

Mon 2/23/2026 10:16 AM



Ybarra, Pamela@Waterboards <Pamela.Ybarra@Waterboards.ca.gov>

To Michael Priestaf; Weerasekera, Dan; Afshari, Soheil

Cc Robin Ferber; Chris Nichelson; Diane Scioli; Peter Duchesneau, Esq. (pduchesneau@manatt.com); McGrath, David; Rajagopal, Shyamala; Tamara Escobedo; Lauren Robinson; Afshari, Soheil; Jennifer Fieber; Gadzinski, Joscelynn M

General\All Employees (unrestricted)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Milan Team,

The Water Board has no comments or objections to the modification of the truck hauling route at Rio Santiago as proposed in your letter dated February 12, 2026.

Sincerely,



**Pamela Ybarra, PE**

Senior Water Resource Control Engineer  
Santa Ana Regional Water Quality Control Board

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