

APPENDIX A

INITIAL STUDY/NOTICE OF PREPARATION AND PUBLIC COMMENTS

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NOTICE OF PREPARATION OF A SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT AND NOTICE OF A SCOPING MEETING

DATE: July 23, 2020
SUBJECT: Notice of Preparation of a Supplemental EIR and Notice of a Scoping Meeting
PROJECT: Zone 4 Landfill Construction Projects and Source Separated Organics Facility
APPLICANT: OC Waste & Recycling, 601 North Ross Street, 5th Floor, Santa Ana, CA 92701

Notice is hereby given pursuant to Sections 15082 and 15163(c) of the State California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations, Title. 14, §15000 et seq.) that the County of Orange (County) has determined that a Supplemental Environmental Impact Report (SEIR) is the appropriate environmental document for the proposed Zone 4 Landfill Construction Projects and Source Separated Organics Facility Project (Project). The County will be the Lead Agency for the proposed Project and will be responsible for the SEIR's preparation pursuant to CEQA and the State CEQA Guidelines. The proposed Project's description and location and a list of probable environmental effects are provided below.

As required by Section 15082 of the State CEQA Guidelines, this Notice of Preparation (NOP) has been prepared and distributed to solicit comments from potential Responsible and Trustee Agencies on Project-related concerns relevant to each agency's statutory responsibilities. Comments on the content and scope of the SEIR also are solicited from any other interested parties (including other agencies and affected members of the public). The SEIR will be the environmental document of reference for Responsible and Trustee Agencies when considering subsequent discretionary approvals.

PROPOSED PROJECT LOCATION

Prima Deshecha Landfill (Landfill) is owned by the County and operated by OC Waste & Recycling (OCWR). OCWR is a County department that is overseen by the Board of Supervisors. Prima Deshecha Landfill is 1,530 acres (ac) and is located in southeastern Orange County partially within San Juan Capistrano (570 ac), San Clemente (133 ac), and unincorporated Orange County (827 ac). The landfill is located at 32250 Avenida La Pata, and access is provided by the Golden State Freeway (Interstate 5 [I-5]), Ortega Highway (State Route 74 [SR-74]), and Avenida La Pata. The Prima Deshecha Landfill site is divided into five zones, called Zones 1 through 5. Zone 1 is the current landfilling area, with an estimated closure date of approximately 2050. Zone 4 is the future landfill development area, with an estimated closure date of approximately 2102.

PROPOSED PROJECT DESCRIPTION

The proposed Project includes the following components: (1) changes to the phasing of operations between Zone 1 and Zone 4 of the landfill to allow for concurrent operations; (2)



blasting, excavation, on-site relocation, pulverizing into soil, soil stockpiling and off-site soil removal of hard rock material in Zone 4, referred to as the San Onofre Breccia area; (3) imported soil trips for liner installation that will occur for all future Zone 4 development phases; and (4) construction and operation of a Source Separated Organics (SSO) recycling facility.

PROBABLE ENVIRONMENTAL EFFECTS

Based on the Initial Study (IS) completed for the proposed Project, the County has determined that the proposed Project could result in impacts related to aesthetics, air quality, and noise. These topics will be analyzed in the SEIR. Mitigation will be developed and included in the SEIR, if necessary, to address the proposed Project's potentially significant adverse effects.

DOCUMENT AVAILABILITY

Copies of this NOP have been transmitted to the California State Clearinghouse of the Office of Planning and Research and to each applicable Responsible and Trustee Agency. Copies of this NOP, the IS, and future environmental documents prepared in conjunction with the proposed Project will be available for public review on the County's website at <http://www.oclandfills.com/events/prima-deshecha-virtual-public-meeting>.

NOTICE OF PREPARATION COMMENT PERIOD

The County invites you to submit written comments describing your specific environmental concerns, if any. The NOP comment period begins on July 23, 2020 and ends on August 21, 2020. Written comments must be received by 5:00 p.m. on August 21, 2020, the close of the public review period. Please send your written comments to Kevin Gaxiola, OC Waste & Recycling, 601 North Ross Street, 5th Floor, Santa Ana, CA 92701 or via email to kevin.gaxiola@ocwr.ocgov.com. Please include your name, address, and contact information in your correspondence.

PUBLIC SCOPING MEETING

To provide an additional opportunity for input, the County will be conducting a Scoping Meeting to present information about the proposed Project and to solicit comments relative to the content of the information to be analyzed in the SEIR. Due to restrictions related to the COVID-19 pandemic, the meeting will be conducted online. The Scoping Meeting will be held on Thursday, July 30, 2020, at 6:00 PM – 8:00 PM. To access the meeting, visit <http://www.oclandfills.com/events/prima-deshecha-virtual-public-meeting>.

INITIAL STUDY

FOR POTENTIAL

**SUPPLEMENTAL EIR NO. 2 TO FINAL EIR NO. 575 FOR THE PRIMA
DESHECHA GENERAL DEVELOPMENT PLAN – ZONE 4 LANDFILL
CONSTRUCTION PROJECTS AND ORGANIC WASTE RECYCLING FACILITY
ORANGE COUNTY, CALIFORNIA**

LSA

July 2020

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INITIAL STUDY

FOR POTENTIAL

SUPPLEMENTAL EIR NO. 2 TO FINAL EIR NO. 575 FOR THE PRIMA DESHECHA GENERAL DEVELOPMENT PLAN – ZONE 4 LANDFILL CONSTRUCTION PROJECTS AND ORGANIC WASTE RECYCLING FACILITY ORANGE COUNTY, CALIFORNIA

Submitted to:

OC Waste & Recycling
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Santa Ana, CA 92701

Prepared by:

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Project No. OWR2001



July 2020

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LIST OF ABBREVIATIONS AND ACRONYMS

AAQS	ambient air quality standards
AB	Assembly Bill
AMSL	above mean sea level
AQMP	Air Quality Management Plan
BMP	Best Management Practice
CAL FIRE	California Department of Forestry and Fire Protection
CalEPA	California Environmental Protection Agency
California Register	California Register of Historical Resources
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
County	County of Orange
CSS	coastal sage scrub
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
GDP	General Development Plan
GHG	greenhouse gas
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HMMP	Habitat Mitigation and Monitoring Plan
I	Interstate
Landfill	Prima Deshecha Landfill
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
MMRP	Mitigation Monitoring and Reporting Program
MRF	Materials Recovery Facility

NPDES	National Pollutant Discharge Elimination System
OCWR	OC Waste & Recycling
PRC	Public Resources Code
Project	Prima Deshecha Landfill General Development Plan Update
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCH	State Clearinghouse
SDG&E	San Diego Gas & Electric
SGMA	Sustainable Groundwater Management Act
SR	State Route
SRA	State Responsibility Area
SSHCP	Orange County Southern Subregion Habitat Conservation Plan
SSO	Source-Separated Organics
TPD	tons per day
USACE	United States Army Corps of Engineers
USC	United States Code
USFWS	United States Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled

1.0 INTRODUCTION

The proposed Project includes the following components: (1) changes to the phasing of operations between Zone 1 and Zone 4 of the Landfill to allow for concurrent operations; (2) blasting, excavation, on-site relocation, pulverizing into soil, soil stockpiling, and off-site soil removal of hard rock material in Zone 4, referred to as the San Onofre Breccia area; (3) imported soil trips for liner installation that will occur for all future Zone 4 development phases; and (4) construction and operation of a Source-Separated Organics (SSO) waste recycling facility.

This Initial Study evaluates the potential environmental impacts that may result from development of the proposed Project. Consistent with State CEQA Guidelines Section 15050, the County of Orange (County) is the Lead Agency under CEQA, and the Orange County Board of Supervisors is responsible for adoption or certification of the environmental document and approval of the proposed Project.

In accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines, this Initial Study has been prepared for the proposed Project. Pursuant to Section 15063(a) of the State CEQA Guidelines, OC Waste & Recycling (OCWR) is required to undertake the preparation of an Initial Study to determine whether the proposed action will have a significant effect on the environment. The purposes of this Initial Study are to: (1) identify potential environmental impacts, (2) provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR) or Negative Declaration, (3) enable the Lead Agency to modify the Project (through mitigation of adverse impacts), (4) facilitate assessment of potential environmental impacts early in the design of the Project, and (5) provide documentation for the potential finding that the Project will not have a significant effect on the environment or can be mitigated to a level of insignificance (CEQA Guidelines, Section 15063[c]). This Initial Study is also an informational document providing an environmental basis for subsequent discretionary actions that could be required from other Responsible Agencies.

As described below, the analysis in this Initial Study is based in part on the findings of Final EIR No. 575 and Final Supplemental EIR No. 597, which were previously certified by the County of Orange for the 2001 Prima Deshecha GDP and the Second Amendment to the 2001 Prima Deshecha GDP, respectively.

1.1 CEQA BACKGROUND

1.1.1 Previous Environmental Documents

On November 6, 2001, the Orange County Board of Supervisors approved Final EIR No. 575 (State Clearinghouse [SCH] #199041035) for the implementation of the Prima Deshecha GDP and development of Zones 1 and 4 of the Landfill.

The Project analyzed in Final EIR No. 575 included the following elements:

- Final EIR No. 575 analyzed the GDP for the Prima Deshecha site, which includes a landfill element, a circulation element and a recreation element. In order to provide for all three elements, the Prima Deshecha property was divided into five zones. Zones 1 and 4 are reserved for landfill development, Zone 2 and Zone 3 are reserved for habitat mitigation and open space, and Zone 5 is reserved for the La Pata Avenue Gap Closure project. The La Pata Avenue Gap Closure project was completed in 2016.
- For the landfill element of the Prima Deshecha GDP, Final EIR No. 575 analyzed a total design capacity of approximately 53.1 million cubic yards for the Zone 1 landfill development area on 271 acres at a maximum design elevation of 600 feet above mean sea level (AMSL). In addition, for the Zone 4 landfill development area, Final EIR No. 575 analyzed a total design capacity of approximately 118.5 million cubic yards on 409 acres at a maximum design elevation of 1,010 feet AMSL. Estimated closure dates of 2019 for the Zone 1 landfill development area and 2067 for the Zone 4 landfill development area were based on inflow rate assumptions of up to 4,000 tons per day (TPD). The GDP noted that landfill phasing and staging could be affected by increases or reductions in the rate of disposal.
- The landfill development limits of the Zone 4 landfill area were further refined through the Talega Settlement Agreement between the County and Rancho Mission Viejo, approved by the Board of Supervisors on October 22, 2002.

On June 19, 2007, the Orange County Board of Supervisors approved Final Supplemental EIR No. 597 for the Second Amendment to the Prima Deshecha GDP (SCH #199041035). The Project analyzed in Final Supplemental EIR No. 597 included the following project description elements:

- Increased grading disturbance and landfill excavation limits for both the Zone 1 and Zone 4 landfills to allow for future landslide remediation projects; no change to the GDP, landfill depth of waste, or landfill final elevations that were analyzed in Final EIR No. 575.
- Re-design of future desilting basins for the Zone 4 landfilling area.
- Changing the significance conclusion of the air quality section in Final EIR No. 575 from less than significant with mitigation to unavoidable significant adverse impact to reflect that both the worst-case daily construction and operational emissions from a 4,000 TPD landfill that were analyzed in Final EIR No. 575 would exceed both the daily construction and operational emissions thresholds of significance included in the South Coast Air Quality Management District's (SCAQMD) *CEQA Air Quality Handbook*.
- More clearly defined biological mitigation to provide compensatory mitigation for the biological impacts associated with the future Zone 4 landfill development.

Finally, on September 27, 2018, the Director of OCWR approved Addendum No. 6 to Final EIR No. 575/Addendum No. 2 to Final Supplemental EIR No. 597. Addendum No. 6 addressed the following changes to the GDP:

- Revised the Prima Deshecha Landfill closure dates from 2019 to 2050 for Zone 1 and from 2067 to 2102 for Zone 4.
- Reduced the Zone 1 landfill development footprint by 1.8 acres.

These changes did not result in any increases to the following: (1) volume of accepted solid waste, (2) development footprint, (3) design capacity, (4) slopes of the ultimate fill grading plans, (5) permitted depth of waste, or (6) landfill final elevations for the Zone 1 and Zone 4 landfill development areas as analyzed in Final EIR No. 575 and Final Supplemental EIR No. 597.

1.1.2 Subsequent CEQA Documentation

Section 15162 of the State CEQA Guidelines provides that when an EIR has been certified for a project no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record that one or more of the following things have occurred:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR.
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR.
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.

- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163 of the State CEQA Guidelines provides that a lead of responsible agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

- (1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
- (2) Only minor additions or changes would be necessary to make the previous EIR apply to the project in the changed situation.

Section 15163(b) of the State CEQA Guidelines further states that a supplement to an EIR need only contain the information necessary to make the previous EIR adequate for the project as revised.

Since certification of Final EIR No. 575 in November 2001 and certification of Final Supplemental EIR No. 597 in June 2007, there have been several revisions to CEQA and the State CEQA Guidelines. Most recently, CEQA and the State CEQA Guidelines were updated in December 2018 and several new topics were added. The revised State CEQA Guidelines apply to a CEQA document only if the revised Guidelines are in effect when the document is sent out for public review (State CEQA Guidelines, § 15007(c)). Therefore, because OCWR intends to prepare a Supplemental EIR, which need only contain the information necessary to make the previous EIR adequate for the project as revised, the Supplemental EIR will not address topics added in the 2018 CEQA update or any update that occurred between 2001 and the present day.

1.2 CONTACT PERSON

Any questions or comments regarding the preparation of this Initial Study, its assumptions, or its conclusions should be referred to:

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OC Waste & Recycling
601 North Ross Street, 5th Floor
Santa Ana, California 92701
Tel: (949) 728-3042
Email: kevin.gaxiola@ocwr.ocgov.com

2.0 PROJECT DESCRIPTION

2.1 EXISTING PROJECT SITE

2.1.1 Regional Location and Setting

The Landfill property is 1,530 acres and is located in southeastern Orange County partially within San Juan Capistrano (570 acres), City of San Clemente (133 acres), and unincorporated Orange County (827 acres) (see **Figure 2.1**). The Landfill is located at 32250 Avenida La Pata and access is provided by the Golden State Freeway (Interstate [I] 5), Ortega Highway (State Route [SR] 74), and La Pata Avenue.

The Landfill is located the western foothills of the Santa Ana Mountains. Ground elevations range from 230 feet AMSL at the southwestern boundary of the site to a maximum elevation of 1,125 feet AMSL at the northeastern boundary of the site. Bedrock materials exposed in the area consist of predominantly Tertiary marine sediments composed of, from oldest to youngest, the San Onofre Breccia, the Monterey Formation, and the Capistrano Formation. The Prima Deshecha Cañada watercourse traverses the site from the northeast to the southwest.

The Landfill is a Class III solid waste landfill that has been in continuous operation since 1976. The Prima Deshecha Landfill site is divided into five zones, called Zones 1 through 5, as shown on **Figure 2.2**. Zone 1 is the current landfilling area, with an estimated closure date of approximately 2050. Zone 4 is the future landfill development area, with an estimated closure date of approximately 2102. Two major utility easements, including a 150-foot-wide San Diego Gas and Electric (SDG&E) easement and a 200-foot-wide Southern California Edison (SCE) easement, extend through the central portion of the site, which separates the western Zone 1 area from the Zone 4 area. Zones 2 and 3 are open space and habitat mitigation areas, and Zone 5 is Avenida La Pata. There are existing uses (i.e., administrative offices/operations building, a household hazardous waste collection center, and a gas-to-energy facility) near the Landfill entrance that do not fall within a designated zone. An existing public use trail that crosses the Landfill site connects the San Clemente and San Juan Capistrano trail systems. There is also an existing 487-acre Conservation Easement that OCWR placed over a large portion of the landfill property on non-landfill development areas (often falling within Zones 2 and 3) as a requirement of the Landfill's inclusion in the Orange County Southern Subregion Habitat Conservation Plan (SSHCP), a multi-species habitat mitigation and management plan for south Orange County.

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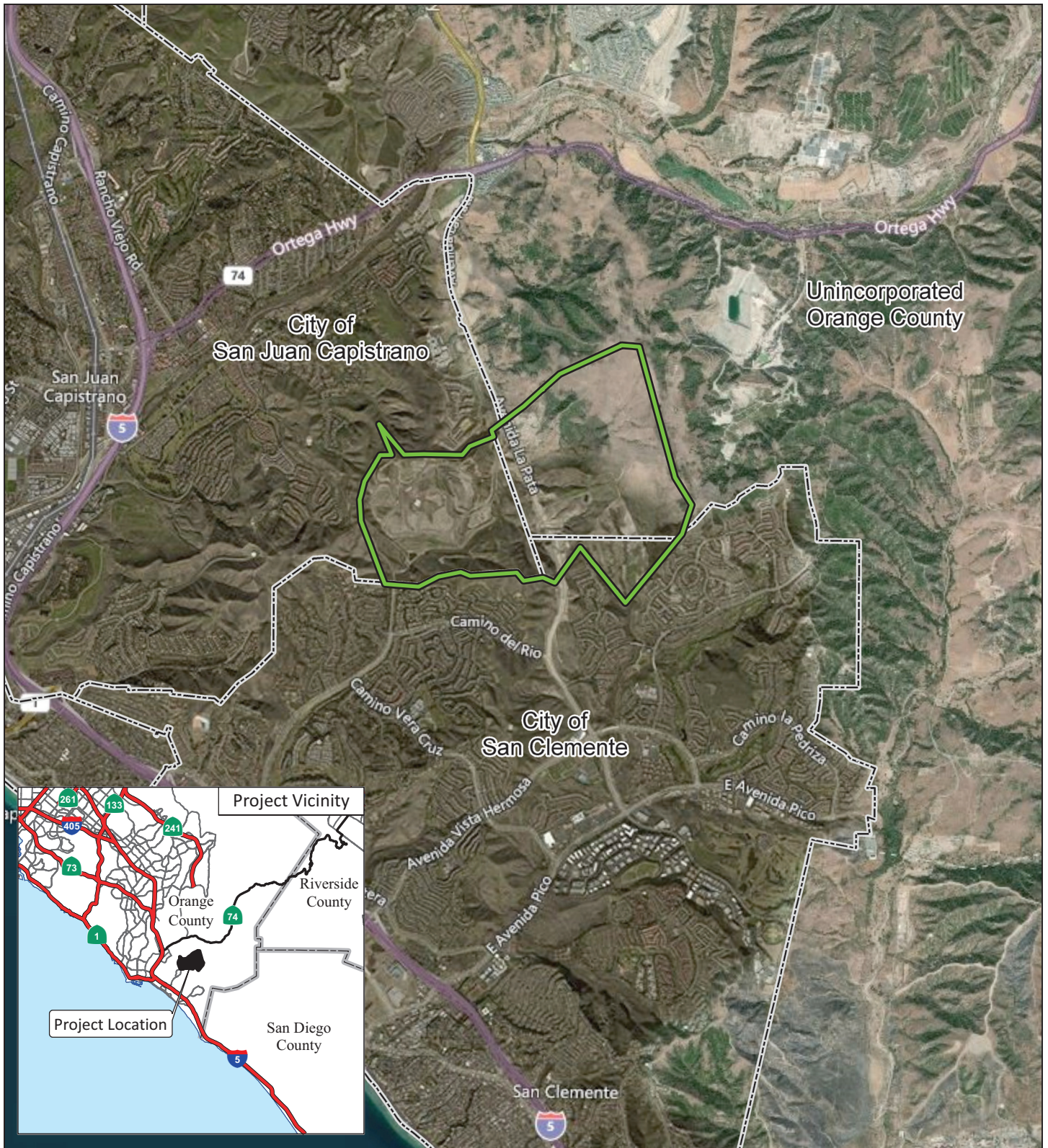
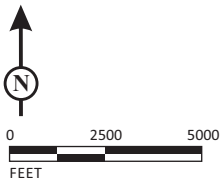


FIGURE 2.1

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LEGEND

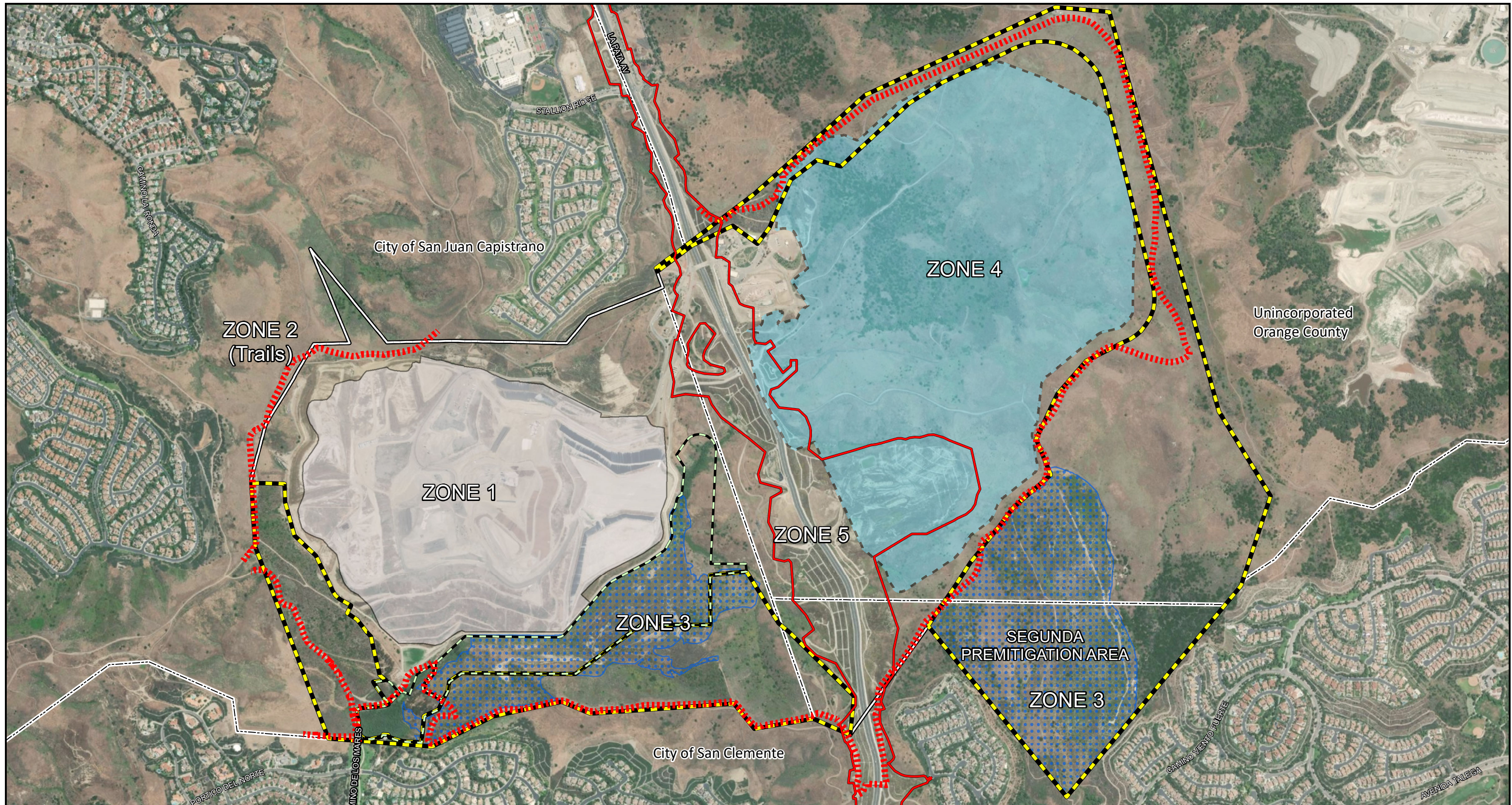
 Prima Deshecha Landfill Boundary



SOURCE: Bing Maps









Prima Deshecha Landfill GDP
Project Location

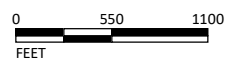
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LEGEND

-  Prima Deshecha Landfill (PDLF) Boundary
-  Supplemental Open Space Conservation Easement Area (486.4 ac)
-  Proposed Conservation Easement (70.7 ac)
-  PDLF Zone 1
-  PDLF Zone 2 (Multi-Use Trail System)
-  PDLF Zone 3
-  PDLF Zone 4
-  La Pata Maximum Direct Disturbance Limit (PDLF Zone 5)



SOURCE: OCWR (2001, 2005, 2010, 2017, 6/2020); Esri (7/2019)

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FIGURE 2.2

Prima Deshecha Landfill GDP
Landfill Zones

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Existing land uses within the Landfill and the surrounding vicinity are shown on **Figure 2.3**. The Orange County General Plan designation for the landfill is 4LS, Public Facilities with a Landfill Site Overlay. As an active public facility, the Landfill is exempt from the Orange County Zoning Ordinance. General Plan land use designations surrounding the Landfill can be characterized as follows (refer to **Figure 2.4** for the County's General Plan Land Use Map):

- To the northeast, unincorporated Orange County includes areas designated Open Space.
- To the east, unincorporated Orange County includes areas designated Suburban Residential, which is also designated as Planning Area 5 by the Ranch Plan.
- The northwest, the City of San Juan Capistrano includes areas designated Planned Community.
- The west, the City of San Juan Capistrano includes areas designated General Open Space.
- To the south, the City of San Clemente includes areas designated Public Open Space, Private, Open Space, and residential development ranging from Very Low Density to Medium Density Residential.

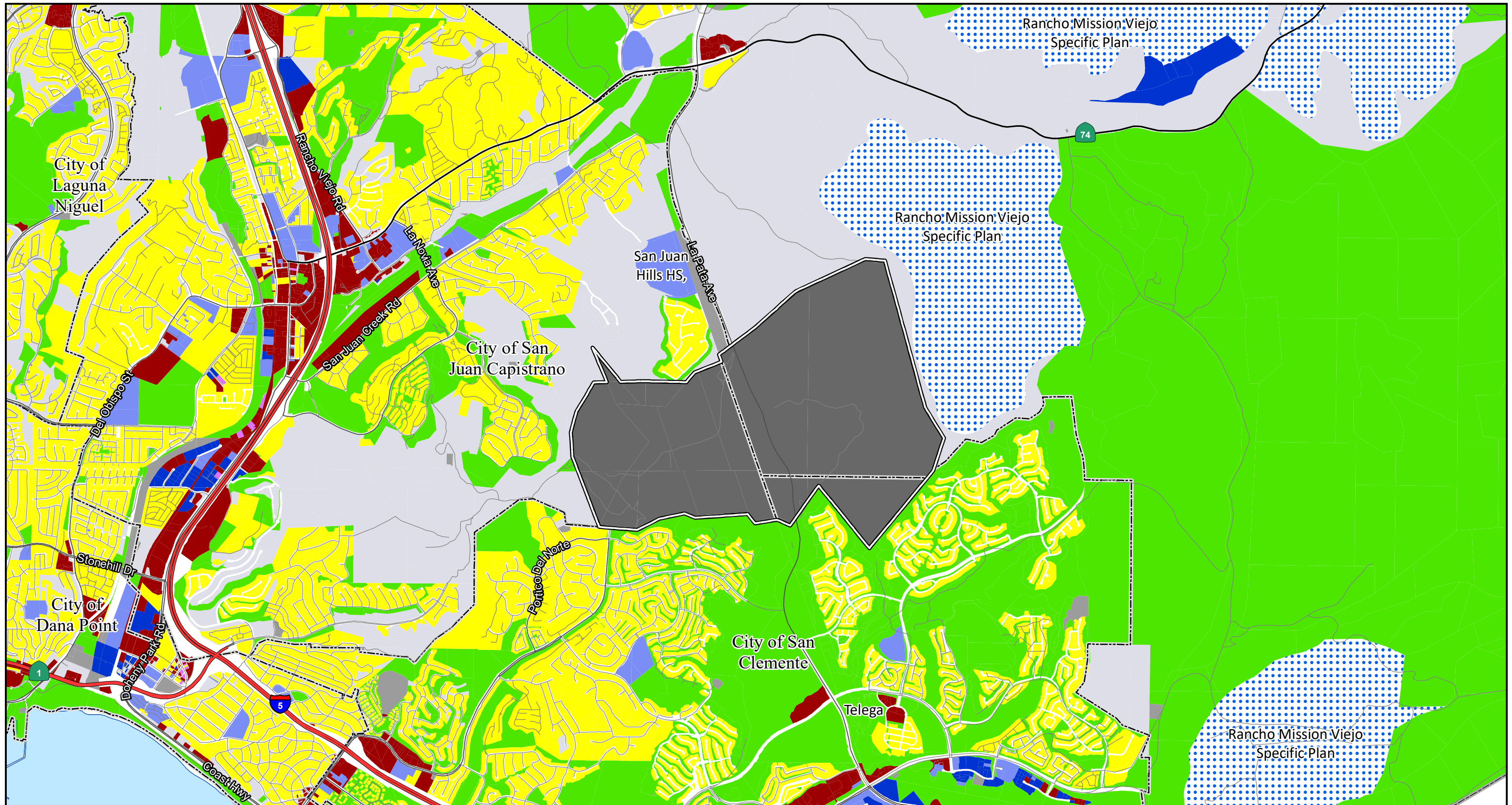
2.1.2 Current Landfill Operations

Of the total 1,530-acre property, 680 acres are currently permitted for waste disposal. The Landfill accepts solid waste from commercial waste haulers and the public. The Landfill is open from 7:00 a.m. to 5:00 p.m., Monday through Saturday, 307 days per year (i.e., it is closed on Sundays and on the six major holidays).

The Landfill is a deep-canyon, cut-and-cover facility. To determine the tipping fee, trucks are weighed by scales before entering the facility and are then directed to a designated area of the Landfill for waste disposal. OCWR heavy equipment operators use compactors, bulldozers, and large earthmovers to push and compact waste for ultimate burial and daily covering with soil or an approved alternative daily cover material, which includes processed green material and geosynthetic tarps. Upon acceptance of waste for disposal at the scale house, the fee collector directs the haulers to the working face of the Landfill. Signs are posted along the on-site access road to guide customers to the unloading areas. Commercial vehicles are generally directed to an unloading area that is separate from the area used by members of the public.

The Landfill is permitted to accept up to 4,000 TPD of solid waste. The Landfill is also permitted to accept up to 350 TPD of digested dewatered biosolids (i.e., wastewater treatment plant sludge). The Landfill currently accepts a daily average of approximately 1,800 TPD of solid waste. Of this total, approximately 1,400 TPD are received from Orange County cities served by the Prima Deshecha Landfill, which include Aliso Viejo, Dana Point, Laguna Niguel, Mission Viejo, Rancho Santa Margarita, San Clemente, and San Juan Capistrano, as well as unincorporated Orange County. Solid waste materials are primarily delivered by commercial franchise waste haulers under contract to

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LEGEND

Prima Deshecha Landfill (PDLF) Boundary

Existing Land Use

Residential

Commercial

Facilities

Military Installations

Industrial

Transportation, Communications, and Utilities

Landfill

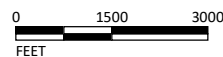
Specific Plan

Mixed Use

Open Space and Recreation

Water

Vacant or Unknown

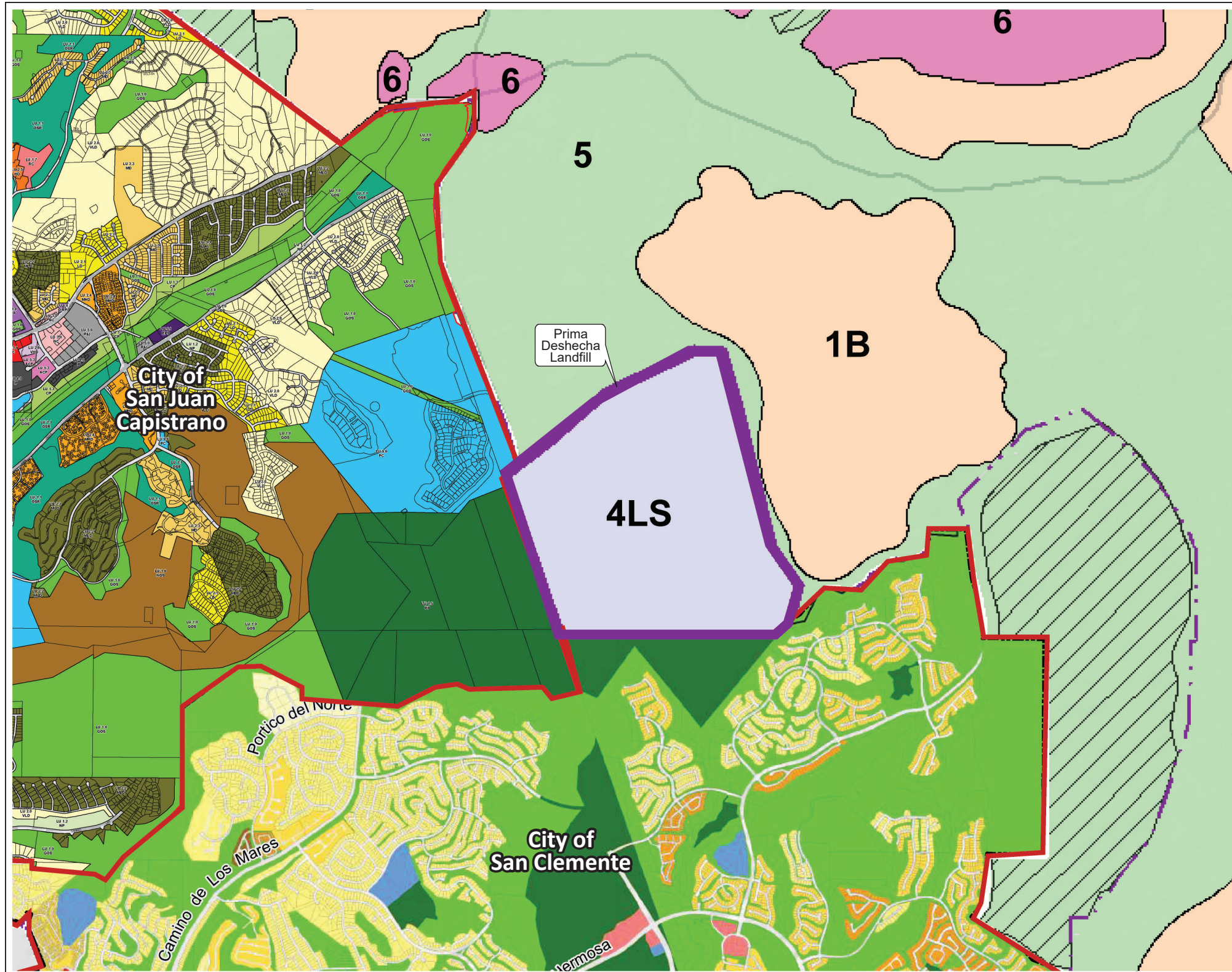


SOURCE: OCWR (2001), Esri (2010), SCAG (11/2019)

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FIGURE 2.3

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City of San Juan Capistrano General Plan Land Use

- 1.0, GENERAL OPEN SPACE
- 1.1, OPEN SPACE RECREATION
- 1.2, NEIGHBORHOOD PARK
- 1.3, COMMUNITY PARK
- 1.4, SPECIALTY PARK
- 1.5, REGIONAL PARK
- 1.6, NATURAL OPEN SPACE
- 1.7, RECREATION COMMERCIAL
- 2.0, VERY LOW DENSITY
- 2.1, LOW DENSITY
- 2.2, MEDIUM LOW DENSITY
- 2.3, MEDIUM DENSITY
- 2.4, MEDIUM HIGH DENSITY
- 2.5, HIGH DENSITY
- 2.6, VERY HIGH DENSITY
- 3.0, NEIGHBORHOOD COMMERCIAL
- 3.1, GENERAL COMMERCIAL
- 4.0, INDUSTRIAL PARK
- 4.1, QUASI INDUSTRIAL
- 4.2, AGRI-BUSINESS
- 4.3, LIGHT INDUSTRIAL
- 4.4, OFFICE/RESEARCH PARK
- 5.0, PUBLIC & INSTITUTIONAL
- 5.1, EXISTING PUBLIC SCHOOLS
- 5.3, ASSISTED CARE FACILITIES
- SPECIAL STUDY
- PLANNED COMMUNITY
- SPECIFIC PLAN/PRECISE PLAN

County General Plan Land Use

RESIDENTIAL

- 1A Rural Residential
Rural Residential Communities (0.25 - 0.5 DU/Ac.)
- 1B Suburban Residential
Suburban Residential Communities (0.5 - 18 DU/Ac.)

PUBLIC FACILITIES

- 4 Public Facilities
- 4 (LS) Landfill Site
(An overlay designation)

OPEN SPACE

- 5 Open Space
- 5 Open Space Reserve
Generalized reserve boundaries for informational purposes only.

URBAN ACTIVITY CENTER

- 6 Urban Activity Center

--- Cleveland National Forest Congressional Boundary
--- City/County Jurisdiction
--- Sphere of Influence Boundary

City of San Clemente General Plan Land Use

- City Boundary
- Coastal Zone Boundary
- Sphere of Influence

GENERAL PLAN LAND USE

- RVL - Residential Very Low Density
- RL - Residential Low Density
- RML - Residential Medium Low Density
- RM - Residential Medium Density
- RH - Residential High Density
- NC - Neighborhood Commercial
- CC - Community Commercial; CC4
- RMF - Regional Medical Facilities
- RC - Regional Commercial
- CRC - Coastal and Recreation Serving Commercial
- LI - Light Industrial
- HI - Heavy Industrial
- MU - Mixed Use
- CVC - Civic Center
- INST - Institutional
- P - Public
- OS1 - Open Space Public
- OS2 - Open Space Private

— City Boundary

LSA



SOURCE: Orange County Public Works, City of San Clemente, City of San Juan Capistrano

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FIGURE 2.4

Prima Deshecha Landfill GDP
General Plan Land Uses

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these cities. The remaining approximately 400 TPD of solid waste are delivered to the Landfill by waste haulers hauling imported solid waste from outside Orange County (i.e., Burrtec/EDCO and Republic), primarily from Los Angeles County. There are only three waste haulers are permitted to haul imported solid wastes to Orange County landfills, via importation contracts with the County.

The Landfill accepts approximately 350 TPD of exempt wastes, which include asphalt and soil for beneficial reuse at the Landfill. The County does not charge for exempt wastes since they are used in daily operations. Soil is used as daily cover and asphalt is used as a base for wet deck operations.

Only municipal solid waste is accepted at the Landfill. No special wastes or liquid wastes other than treated wood waste are accepted at the Landfill. Hazardous materials such as radioactive waste, asbestos, batteries, chemicals, paints, non-autoclaved medical wastes, and other substances considered hazardous are not accepted at the Landfill.

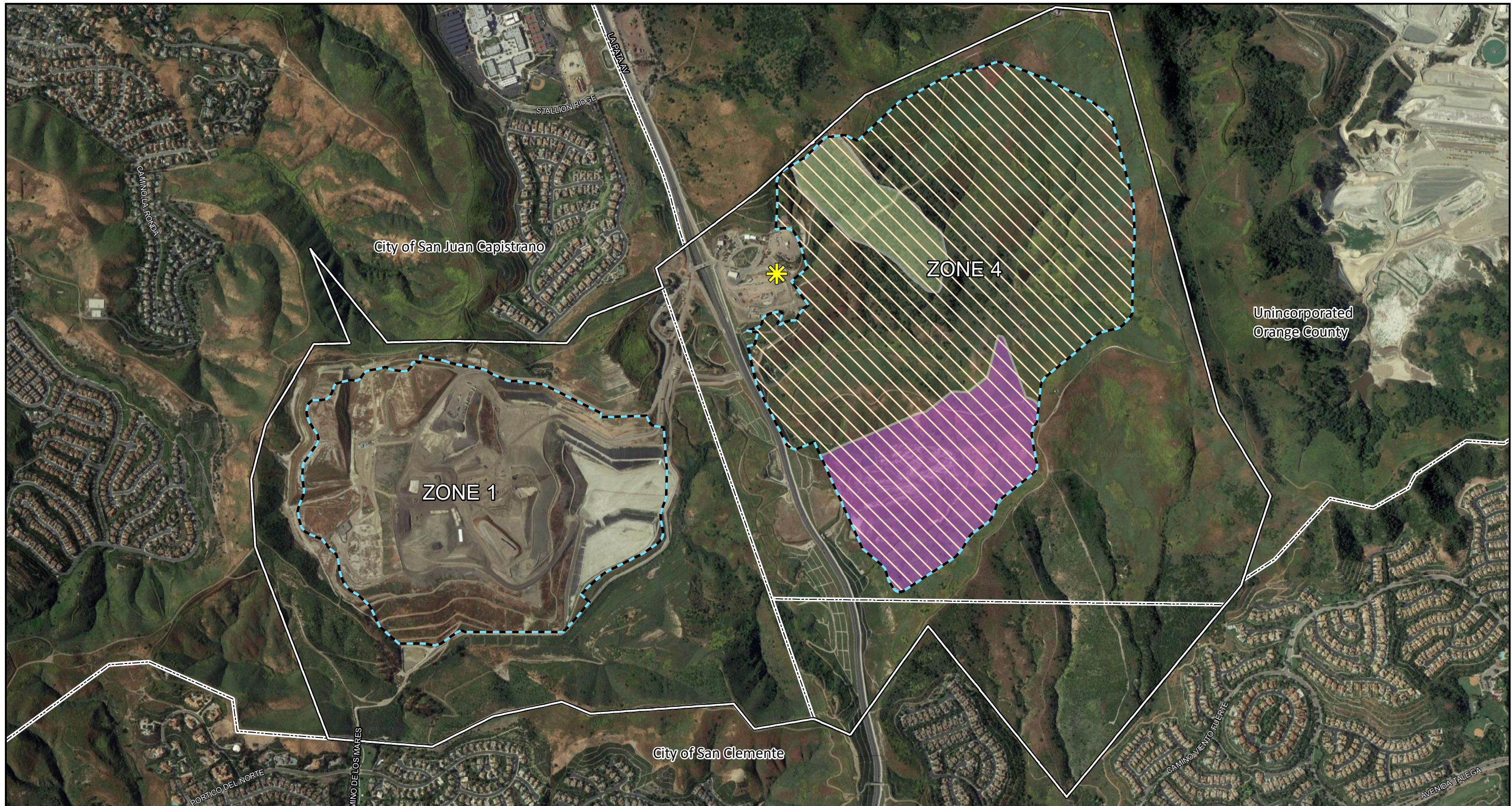
The majority of the solid waste delivered to the Landfill, whether from in-County or out-of-County sources, is first processed in materials recovery facilities, where recyclable materials are removed for recycling. The residual solid waste is then delivered to the Landfill.

The Landfill has state-of-the-art environmental control systems that include a hazardous waste control program; a landfill gas monitoring, recovery, and control system and a landfill gas-to-energy plant; a groundwater monitoring, extraction, and collection system; a leachate collection and recovery system; a radioactive waste recovery program; and fire, erosion, dust, odors, noise, bird, insect, rodent, and litter control. In addition, OCWR operates a household hazardous waste collection center at the Landfill. The Landfill complies with all federal, State, and local requirements for operation of a Class III (i.e., solid waste) sanitary landfill. Site staff conduct daily inspections to ensure that the site is in compliance with all the permit conditions imposed by regulatory agencies having jurisdiction on landfills. Permitting and enforcement regulatory agencies for the Landfill's operation include the California Department of Resources Recycling and Recovery (CalRecycle); the California Regional Water Quality Control Board (RWQCB), San Diego Region; the SCAQMD; and the Local Enforcement Agency (i.e., Orange County Health Care Agency, Environmental Health Department, acting as the Local Enforcement Agency for CalRecycle).

2.2 PROPOSED PROJECT



The proposed Project includes the following components, as shown on **Figure 2.5**: (1) changes to the phasing of operations between Zone 1 and Zone 4 of the Landfill to allow for concurrent operations; (2) blasting, excavation, on-site relocation, pulverizing into soil, soil stockpiling, and off-site soil removal of hard rock material in Zone 4, referred to as the San Onofre Breccia area; (3) imported soil trips for liner installation that will occur for all future Zone 4 development phases; and (4) construction and operation of an SSO recycling facility.





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LSA

LEGEND

-  Prima Deshecha Landfill (PDLF) Boundary
-  Concurrent Operations of Zones 1 and 4

-  Source Separated Organics (SSO) Facility
-  Soil Importation for Liner Installation
-  San Onofre Breccia Removal – Blasting
-  San Onofre Breccia Removal – Pulverizing/Stockpiling



0 550 1100
FEET

SOURCE: OCWR (2001, 2005, 2010, 2017, 6/2020); Google (2019)

I:\OVR2001\GIS\MXD\ProjectComponents.mxd (7/16/2020)

FIGURE 2.5

Prima Deshecha Landfill GDP
Project Component Locations

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2.2.1 Project Components

2.2.1.1 Concurrent Operations for Zones 1 and 4

The 2001 GDP anticipated that Zone 4 of the Landfill would be developed after Zone 1 reached capacity and closed. The proposed Project would allow for concurrent operations in both Zones 1 and 4 to allow landfilling activities to shift between the two zones based on seasonal environmental conditions to minimize any potential noise, dust, and odor impacts that may occur to existing residential developments located near the Landfill. The Zone 1 and Zone 4 landfill development areas are shown on **Figure 2.2**. While both Zone 1 and Zone 4 would be considered active from a regulatory standpoint, Zone 1 and Zone 4 would not be accepting refuse for disposal at the same time, and the Landfill would continue to have only one active working face area on a daily basis for daily landfill disposal operations. OCWR would spend several months per year landfilling in Zone 1 before moving into Zone 4, and vice versa.

2.2.1.2 San Onofre Breccia Removal

The Zone 4 landfilling area includes approximately 9 million cubic yards of San Onofre Breccia hard rock material. The location of the San Onofre Breccia material is shown on **Figure 2.5**. This material will be blasted, excavated, and relocated on site to the future Zone 4 Phase C area. Once at the Zone 4 Phase C area, the rock material will be pulverized into soil and then stockpiled. The Zone 4 Phase C stockpile area will accommodate up to 3.3 million cubic yards of soil material. From this location, since the San Onofre Breccia soil will be unsuitable for use as landfill daily cover but may be used for other construction purposes, the stockpiled soil may be transported off site to end markets. The Breccia component of the proposed Project will last from approximately 2023–2042 or approximately 20 years. Stockpiled soil in the Zone 4 Phase C stockpile will be exported off site, generating approximately 81 trips per day for the entire 20-year duration.

2.2.1.3 Soil Importation for Liner Installation

During the construction of new landfill development phases, OCWR would import a significant amount of soil for liner installation. Approximately 8,108 cubic yards of soil would be imported for each new development phase. The duration of soil importation during liner installation for each development phase is approximately 20 operating days per month in duration and would result in approximately 23 truck trips per day. Soil import trips would begin in 2023 and would occur approximately every 10 to 15 years as phases are constructed (two of the later phases may be constructed at a lesser interval of 5 years). Soil import trips would continue throughout construction of all of the Zone 4 phases during liner installation, with the last Zone 4 development phase (which will include a new liner Zone H) anticipated to be constructed in approximately 2088–2089. An additional Zone I will be constructed after this, but it will be a vertical expansion only, with no new liner or liner soil requirements.

2.2.1.4 Source-Separated Organic Waste Recycling Facility

The proposed Project includes a new, fully enclosed, SSO waste recycling facility (SSO recycling facility) that would accept and process up to 300 tons of SSO waste per day. The SSO recycling facility would be located on an approximately 2-acre previously disturbed site. The SSO recycling

facility would accept source-separated food waste from existing materials recovery facilities in Orange County. The material would be loaded into in-vessel drums. The purpose of the in-vessel drums would be to separate the liquids from solids. Processing would be completed the same day that the material arrives at the facility. It is estimated that the facility processing would create approximately 50 percent liquids and 50 percent solids. Processed liquid material would then be transported to existing wastewater treatment plants in central and south Orange County to be included in their existing anaerobic digestion operations. Approximately 45 truck trips per day are anticipated for operation of this facility, assuming approximately 30 inbound truck trips and approximately 15 outbound truck trips per day. There would be approximately 15 outbound trips per day since approximately 50 percent of the volume of the completed SSO recycling facility process would be residual solid waste that will be disposed at the Landfill. In addition, approximately 30 employee vehicle trips per day and 10 material delivery trips per day are anticipated. Residual solid waste material from the SSO recycling facility would be disposed of at the Landfill. It is anticipated that the proposed SSO recycling facility would be constructed in 2024 and that construction would take approximately 4 months. During construction of the SSO recycling facility, there would be approximately 40 vehicle trips per day (i.e., 30 trips per day from construction worker vehicle trips and 10 trips per day from material delivery trips).

2.2.1.5 Construction Staging

Project construction would require on-site staging areas to support construction activities. Material disposal areas are also planned for placement of excess foundation excavation spoils. Staging areas would be required to provide stockpile areas for the San Onofre Breccia and other materials, laydown, and storage areas for equipment and materials.

2.3 REQUIRED PERMITS AND APPROVALS

2.3.1 Discretionary Actions

Implementation of the Project would require various approvals and permits from local, State, and federal agencies with jurisdiction over specific elements of the Project. The discretionary approvals by the County, as the Lead Agency, would include the following:

- Certification of the Supplemental EIR by the Orange County Board of Supervisors

2.3.2 Other Ministerial Actions

Ministerial permits/approvals (e.g., grading permits and building permits) would be issued by the County, or other appropriate agencies or utilities, to allow Project Site preparation, connections to utility infrastructure, paving, and other Project features subject to ministerial permits.

2.3.3 Probable Future Actions by Responsible Agencies

Because the Project also involves approvals, permits, or authorization from other agencies, these agencies are “Responsible Agencies” under CEQA. Section 15381 of the State CEQA Guidelines defines Responsible Agencies as public agencies other than the Lead Agency that will have

discretionary approval power over the Project or some component of the Project, including mitigation. These agencies include, but are not limited to, the agencies identified in **Table 2.A**.

Table 2.A: Anticipated Permits and Authorizations

Agency	Permit/Authorization
Regional Water Quality Control Board (RWQCB)	<ul style="list-style-type: none"> ● Construction General Permit (Order 2009-0009-DWQ, amended by 2010-0014-DWQ and 2012-0006-DWQ) ● Waste Discharge Requirements for the Prima Deshecha Landfill (Order No. R9-2003-0306) ● General Permit for Storm Water Discharges Associated with Industrial Activities (Order 2014-0057-DWQ).
South Coast Air Quality Management District (SCAQMD)	<ul style="list-style-type: none"> ● New Source Performance Standards/Emission Guidelines ● Title V (1990 Clean Air Act) Permit Revision ● Rule 1150 (Excavation of Landfill Sites) ● Rule 1150.1 (Landfill Gas Emissions) ● Rule 431.1 (Sulfur Content of Gaseous Fuels) ● Rule 431.2 (Sulfur Content of Liquid Fuels)
Local Enforcement Agency with Concurrence by California Department of Resources Recycling and Recovery (CalRecycle)	<ul style="list-style-type: none"> ● Solid Waste Facilities Permit Revision

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3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED


The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist in Chapter 3.0.

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

3.1 DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT¹ is required.
- I find that the proposed Project MAY have a “Potentially Significant Impact” or “Potentially Significant Unless Mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.



 Signature
 OCWR CEQA MANAGER

JULY 22, 2020

 Date

¹ Section 15163(b) of the State CEQA Guidelines states that a supplement to an EIR need only contain the information necessary to make the previous EIR adequate for the project as revised. As such, OCWR intends to prepare a Supplemental EIR.

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4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. **Earlier Analyses Used.** Identify and state where they are available for review.
 - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significant.

4.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Would the project have a substantial adverse effect on a scenic vista?

Potentially Significant Impact. Final EIR No. 575 found that the construction and operation of the Prima Deshecha Landfill (Landfill) through completion of the General Development Plan (GDP) for the Landfill would result in an unavoidable significant adverse impact to aesthetics, even after the implementation of mitigation measures. However, Final EIR No. 575 did not specify whether the Landfill operation would result in a potentially significant impact to a scenic vista. A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the public's benefit. It is usually viewed from some distance away. The Landfill is visible from various areas within the cities of San Clemente and San Juan Capistrano. The proposed Project and landfill activities would alter the existing topography of the area and may be visible from public vantage points and scenic vistas. The greatest visual impacts would likely occur in Zone 4 during blasting, stockpiling, and removal of San Onofre Breccia. Additionally, the 3.3-million-cubic-yard San Onofre Breccia soil stockpile may be highly visible from off-site locations. As a result, the proposed Project has the potential to have a substantial adverse effect on a scenic vista that was not previously analyzed in Final EIR No. 575. **Therefore, this topic will be analyzed in the Supplemental EIR, and mitigation, if needed, will be developed and included in the Supplemental EIR to address potentially significant adverse Project effects to scenic vistas beyond those previously analyzed in Final EIR No. 575.**

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in no impacts to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway. According to the California Department of Transportation (Caltrans) State Scenic Highway Program and the

Transportation Element of the County General Plan, the Project site is neither located within nor visible from a State or County scenic highway. The Project site is located along Avenida La Pata, which is not an eligible or designated County or State scenic highway. The Project would not damage scenic resources within a State Scenic Highway beyond what was previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Potentially Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in an unavoidable significant adverse impact to aesthetics, specifically in non-urbanized areas, and that the proposed Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings, even after the implementation of mitigation measures. The Landfill is characterized by undulating ridgelines which define the site perimeter and divide the interior into a series of three general canyon areas. The northeast portion of the site contains some steep topography and occasional bedrock exposures, while the southern and western portions have a gentler, hilly terrain covered with native grasses. The Landfill is visible from various areas within the cities of San Clemente and San Juan Capistrano. The proposed Project and landfill activities may alter existing views of the site, however, it is unlikely that proposed Project changes would substantially degrade the visual character or quality of public views of the site and its surroundings. Nevertheless, because of the nature of the proposed Project (in particular, the alteration of the terrain that would occur in Zone 4 during blasting, stockpiling, and removal of San Onofre Breccia) and because the 3.3-million-cubic-yard San Onofre Breccia stockpile area would likely be highly visible from off-site areas, the proposed Project would likely result in an increase in the severity of the significant aesthetic impact analyzed in Final EIR No. 575. Because there is potential for an increase in the severity of impacts above those previously analyzed in Final EIR No. 575, this threshold will be analyzed in the Supplemental EIR. **This topic will be analyzed in the Supplemental EIR, and mitigation, if needed, will be developed and included in the Supplemental EIR to address potentially significant adverse Project effects beyond those previously analyzed in Final EIR No. 575.**

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact from light and glare on off-site land uses after the implementation of mitigation measures. Similar to the landfill development that was analyzed in Final EIR No. 575, the Project site would be used as a landfill operation that only operates during daylight hours. While the new operations related to the proposed SSO recycling facility would introduce new sources of light and glare to the

Project site, the SSO recycling facility is located within the boundaries of the existing Landfill (refer to **Figure 2.5**) and is not located adjacent to existing residential or other sensitive land uses. In addition, the SSO recycling facility would only operate Monday through Saturday between the hours of 7:00 a.m. and 5:00 p.m., and minimal nighttime lighting would be required. Based on the daytime operations of this facility and its location within the Landfill, the SSO recycling facility is not anticipated to result in substantial light or glare that would adversely affect day or nighttime views in the area. The proposed Project's impacts to light and glare would be similar to those light and glare impacts analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to this sub-topic within aesthetics, light or glare will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact is presented during the scoping process.**

4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would not result in any impacts to farmland. The Project site is designated as urban and built-up, grazing, and other land and is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.² The proposed Project would not convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or any other type of farmland to a non-agricultural use. Therefore, no impacts to farmlands would occur and no mitigation is required. **This topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would not result in any impacts to farmland. The Project site is not zoned or currently used for agricultural purposes, and no Williamson Act contracts are in effect for the Project

² California Department of Conservation. California Important Farmland Finder. Website: <https://maps.conservation.ca.gov/dlrp/ciff/> (accessed June 18, 2020).

site. As a result, the proposed Project would not conflict with existing zoning for agricultural use or Williamson Act contracts. **This topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would not result in any impacts to forest land. The Project site is not zoned or currently used for forest land, timberland, or timberland production. As a result, the proposed Project would not conflict with existing zoning for forest land, timberland, or timberland production. **This topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would not result in any impacts to forest land. No forest or timberland exists on the Project site. Therefore, the proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest use. As a result, no significant impacts would occur. **This topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would not result in any impacts to farmland or forest land. The Project site is not currently used for agricultural purposes and is adjacent to non-agricultural uses. The proposed Project would not result in the conversion of farmland to non-agricultural use because there are no agricultural uses on or in the immediate vicinity of the Project site. As a result, the proposed Project would not result in impacts related to the conversion of agricultural land to non-agricultural use. **This topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

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

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact to air quality, specifically to the applicable air quality plan, after the implementation of mitigation measures. An Air Quality Management Plan (AQMP) describes air pollution control strategies to be undertaken by a city or county in a region classified as a nonattainment area to meet the requirements of the federal Clean Air Act. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State ambient air quality standards (AAQS). For a project to be consistent with the AQMP adopted by the SCAQMD, the pollutants emitted from project operation should not exceed the SCAQMD daily threshold or cause a significant impact on air quality, or the project must already have been included in the AQMP projection. Because the AQMP is based on local General Plans, projects that are deemed consistent with a specific General Plan are usually found to be consistent with the AQMP.

The proposed Project would result in short-term construction emissions of pollutants as a result of the use of heavy equipment and construction-related traffic. The proposed Project would also result in long-term emissions as a result of additional operational truck trips associated with the proposed SSO recycling facility, truck trips associated with soil import for liner construction, and blasting equipment and truck trips associated with the proposed San Onofre Breccia removal. Additional analysis will be conducted as part of the Air Quality Assessment prepared for the proposed Project to determine whether Project emissions would exceed the SCAQMD daily thresholds or cause a significant impact not previously analyzed in Final EIR No. 575 or cause an increase in severity of a previously identified impact on air quality. **This topic will be analyzed in the Supplemental EIR, and mitigation, if needed, will be developed and included in the Supplemental EIR to address**

potentially significant adverse Project effects related to consistency with the AQMP beyond those previously analyzed in Final EIR No. 575.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact to air quality, specifically from a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment under an applicable federal or state ambient air quality standard after the implementation of mitigation measures. Refer to Response 3.3.a, above. The South Coast Air Basin is designated as non-attainment for the pollutants ozone and particulate matter. The proposed Project would result in short-term construction emissions and long-term operational emissions. As part of the proposed Project, analysis will be conducted to assess potentially significant adverse impacts for short- and long-term, Project-related air quality effects. The findings of the air quality analysis and recommended mitigation will be described in the Supplemental EIR. **This topic will be analyzed in the Supplemental EIR, and mitigation will be included in the Supplemental EIR, if necessary, to address potentially significant adverse impacts for short- and/or long-term, Project-related air quality effects beyond those previously analyzed in Final EIR No. 575.**

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact to air quality, specifically from exposing sensitive receptors to substantial pollutant concentrations, after the implementation of mitigation measures. Refer to Response 3.3.a, above. Sensitive receptors are persons defined as more sensitive to the potential unhealthful effects of air emissions. Sensitive receptors can include children and the elderly. Nearby sensitive receptors include residential uses to the northwest and southwest. The proposed Project would result in short-term construction emissions and long-term operational emissions, which could expose these sensitive receptors to substantial pollutant concentrations. Evaluation of Project-related construction and operations emissions will be conducted to assess whether the proposed Project would expose sensitive receptors to substantial pollutant concentration not previously analyzed in Final EIR No. 575 or cause an increase in severity of a previously identified impact on air quality. **This topic will be analyzed in the Supplemental EIR, and mitigation will be developed and included in the Supplemental EIR, if necessary, to address potentially significant adverse Project effects related to substantial pollutant concentrations beyond those previously analyzed in Final EIR No. 575.**

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Potentially Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact to air quality, specifically from odors potentially adversely affecting a substantial number of people, after the implementation of mitigation measures. According to the SCAQMD *CEQA Air Quality Handbook* (1993; currently being revised), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Objectionable odors may be generated during the operation of diesel-powered construction equipment and/or asphalt paving during Project construction. Therefore, construction-related odors would be temporary, would not result in long-term odor impacts, and would not affect a substantial number of people. However, proposed Project components which may generate objectionable odors during operation include the SSO recycling facility, even though this new organic waste processing facility will be fully enclosed. Therefore, the Project may result in permanent impacts related to odors on nearby sensitive receptors (e.g., residential uses) above that previously analyzed in Final EIR No. 575. **This topic will be analyzed in the Supplemental EIR, and mitigation will be developed and included in the Supplemental EIR, if necessary, to address potentially significant adverse Project effects related to odors beyond those previously analyzed in Final EIR No. 575.**

4.4 BIOLOGICAL RESOURCES

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

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in an unavoidable significant impact to biological resources, even after the implementation of mitigation measures. Adverse effects, either directly or through habitat modification, to candidate, sensitive, and special-status species have been analyzed in the previous environmental reviews conducted for the Landfill in Final EIR No. 575. Since the certification of Final EIR No. 575, OCWR has either fully implemented or will soon implement all of the mitigation measures for biological resources included in Final EIR No. 575. In 2007, the Prima Deshecha Landfill was included in the Orange County Southern Subregion Habitat Conservation Plan (SSHCP). As a result, OCWR has installed 122 acres of coastal sage scrub (CSS) and 19 acres of native grassland (as pre-mitigation for future biological impacts

from the future Zone 4 landfill development area) within a permanently protected 530-acre area of the Prima site designated as Supplemental Open Space by the SSHCP. This provides full compensatory mitigation for all of the upland biological impacts identified in Final EIR No. 575 that will occur with the full development of the Landfill.

Final EIR No. 575 indicated that the thread-leaved brodiaea, a State-endangered plant species, had the potential to be found at the Landfill site. The thread-leaved brodiaea was discovered on the Landfill site and in 2012, after obtaining a Section 2081 Incidental Take Permit from the California Department of Fish and Wildlife (CDFW), OCWR translocated 450 thread-leaved brodiaea plants from future development areas in both the Zone 1 and Zone 4 landfill areas as well as areas located in the proposed right-of-way for the OC Public Works La Pata Avenue Gap Closure and Del Rio Extension Project. The brodiaea were translocated to an area within the permanently protected Supplemental Open Space area at the Prima site, as approved by CDFW and the United States Fish and Wildlife Service (USFWS). This mitigation effort has been very successful and, as a result, OCWR has met all of the Section 2081 Incidental Take Permit performance requirements and is currently seeking sign-off on the brodiaea mitigation site by both CDFW and USFWS.

Indirect impacts from construction activities, such as increased noise, dust, and air emissions, would also occur in habitat adjacent to access roads, staging areas, and the Project site. Therefore, Project construction and operation could have potentially significant impacts either directly or through habitat modification to species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS. However, these impacts were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to biological resources beyond what was previously analyzed in Final EIR No. 575 since all areas of the Project site fall within the Landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. OCWR has already implemented all required upland mitigation for the impacts that were identified in Final EIR No. 575. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to biological resources, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact is presented during the scoping process.**

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in an unavoidable significant impact to biological resources, even after the implementation of mitigation measures. Project construction will result in permanent impacts to riparian habitat and sensitive natural communities, including riparian vegetation types and wet meadows and marshes (including riparian herb, southern willow scrub, mule fat scrub, sycamore riparian woodland, Mexican elderberry riparian scrub, and alkali meadow). Additional temporary impacts would occur within staging areas and along access roads. Project construction and operation could have potentially significant

impacts on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations or by the CDFW or USFWS. However, these impacts were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to biological resources beyond what was previously analyzed in Final EIR No. 575 since all areas of the Project site fall within the Landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. For the riparian and wetland impacts that were identified in Final EIR No. 575, OCWR is very close to fully implementing all required mitigation for these impacts. In 2021, OCWR will implement a compensatory riparian restoration and enhancement project in the Trabuco Creek area of O’Neill Regional Park, and OCWR will also implement a wetland creation project at the Prima site within the Supplemental Open Space area. The mitigation projects will be implemented in full compliance with a Section 404 Permit issued by the United States Army Corps of Engineers (USACE), a Section 1602 Permit issued by CDFW, and a Section 401 Permit issued by the California Regional Water Quality Control Board (RWQCB), San Diego Region. In total, OCWR proposes to implement more than 70 acres of mitigation, preservation, and project minimization features to compensate for the permanent impact of 2.23 acres of waters of the United States and 6.44 acres of streambed and associated riparian habitat. These mitigation projects will provide full compensatory mitigation for the wetland and riparian impacts analyzed in Final EIR No. 575. As described above, impacts to sensitive natural communities from existing Landfill operations including CSS habitat and native grasslands are addressed in the premitigation efforts implemented by OCWR as a part of the SSHCP Implementation Agreement. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to biological resources, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact is presented during the scoping process.**

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in an unavoidable significant impact to biological resources, even after the implementation of mitigation measures. Refer to Response 3.4.b, above. Impacts to State or federally protected wetlands from Landfill operations, including the expansion of Zone 4, were accounted for in Final EIR No. 575, and a Section 404 Individual Permit was obtained from the USACE in January 2020. The Section 404 Individual Permit also required OCWR to obtain a Section 401 Water Quality Certification from the RWQCB. In addition, a Habitat Mitigation and Monitoring Plan (HMMP) was developed to implement and maintain the mitigation required to compensate for impacts to resources under the jurisdiction of the CDFW, USACE, and RWQCB. In total, OCWR proposes to implement more than 70 acres of mitigation, preservation, and project minimization features to compensate for the permanent impact of 2.23 acres of waters of the United States and 6.44 acres of streambed and associated riparian habitat.

The RWQCB nonwetland establishment site covered in the HMMP is located within the Prima Deshecha Landfill Supplemental Open Space area. Therefore, the proposed nonwetland establishment area will compensate for the nonwetland ephemeral drainages impacted within the Zone 4 development limits.

Project construction may result in the loss or filling of federally protected wetlands within the Landfill. Additionally, temporary impacts within staging areas and along access roads could occur. Project construction and operation could have potentially significant impacts on federally protected wetlands and waters of the United States as defined by Section 404 of the Clean Water Act. Therefore, the improvements associated with the proposed Project could potentially affect wetlands. However, these impacts were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to biological resources beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the Landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. OCWR is very close to fully implementing all required mitigation for impacts to biological resources identified in Final EIR No. 575. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to biological resources, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact is presented during the scoping process.**

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in an unavoidable significant impact to biological resources, even after the implementation of mitigation measures. Refer to Response 3.4.a, above. As noted in Final EIR No. 575, the continued landfilling activities act as a deterrent to wildlife movement, especially northeast to southwest movement of wildlife through the Project site via the main Prima Deshecha Cañada drainage. Construction activities may temporarily affect movement of local wildlife; however, open spaces will be preserved in Zone 3 of the Landfill. Therefore, while the long-term impacts to regional and local wildlife movement would be adverse, these impacts are not considered to be significant.

Areas within and surrounding the Landfill provide habitat for breeding wildlife, including native birds, mammals, amphibians, fish, reptiles, and invertebrates. The proposed Project would permanently impact areas within Zones 1 and 4, and construction activities (including temporary construction areas) would have the potential to disrupt breeding wildlife. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (United States Code [USC] Title 33, Section 703 et seq.; see also Code of Federal Regulations [CFR] Title 50, Part 10) and Section 3503 of the California Fish and Game Code. Implementation of the proposed Project would be subject to the provisions of these regulations that prohibit disturbing or destroying active nests. However, these impacts were already analyzed in Final EIR No. 575, and the proposed Project would not result in

any new significant impacts or more severe impacts to biological resources beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the Landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. OCWR has already implemented all required upland mitigation for the impacts that were identified in Final EIR No. 575. OCWR is very close to fully implementing all required mitigation for impacts to biological resources identified in Final EIR No. 575. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to biological resources, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact is presented during the scoping process.**

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact, regarding potential conflicts with any local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance. The Landfill has been in operation since 1976 and the 2001 GDP is the governing land use plan for the site. Development anticipated as part of the proposed Project would occur in Zones 1 and 4, which are intended for landfill operations. As previously concluded in Final EIR No. 575, implementation of the proposed Project would not conflict with any local ordinances protecting biological resources. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact regarding potential conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. However, in 2007, the Prima Deshecha Landfill was included in the SSHCP. As a result, OCWR has installed 122 acres of CSS and 19 acres of native grassland as pre-mitigation for future biological impacts from the future Zone 4 landfill development area within a permanently protected 530-acre area of the Prima site designated as Supplemental Open Space by the SSHCP. This provides full compensatory mitigation for all of the upland biological impacts identified in Final EIR No. 575 that will occur with the full development of the Landfill. Operation and expansion of the Prima Deshecha Landfill (including all activities in the 2001 GDP) are covered activities under the SSHCP.

The proposed Project would comply with the requirements of the SSHCP. OCWR has already implemented all required upland mitigation required by the SSHCP. The proposed Project would not result in any new significant impacts or more severe impacts to biological resources beyond what was previously analyzed in Final EIR No. 575, since all areas of the proposed Project fall within the landfill development areas previously analyzed in Final EIR No. 575, and therefore no new or additional mitigation is required. **Since this topic will not result in any new significant impacts or more severe impacts to biological resources when compared to the biological resources analysis included in Final EIR No. 575, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact is presented during the scoping process.**

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in no impacts to historical resources and would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. CEQA defines a “historical resource” as a resource that meets one or more of the following criteria: (1) is listed in, or determined eligible for listing in, the California Register of Historical Resources (California Register); (2) is listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) is identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) is determined to be a historical resource by a project’s Lead Agency (PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5[a]). Due to the static nature of historical resources, the conditions of the proposed Project would be consistent with those identified in Final EIR No. 575. Final EIR No. 575 found that there would be no impacts to historical resources and no mitigation would be required. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to archaeological resources after the implementation of mitigation measures. In particular, grading, earthmoving and excavation for the landfilling activities would result in removal or destruction of the archeological resources and possibly additional resources, which may exist in both Zones 1 and 4 but which were not identified at the time Final EIR No. 575 was certified because of the heavy cover of vegetation on much of the site. These impacts were found to be significant based on the moderate to high sensitivity rating for archeological resources assigned to the site and mitigation was required.

More recently, additional archaeological research was conducted in support of the expansion of the Landfill into Zone 4. In 2015, a records search and site survey were conducted to identify existing cultural resources within Zone 4, and a total of 18 resources (i.e., 9 cultural resource sites and 9 isolates) were identified as having been recorded within the area. No additional cultural resources work was recommended at the 9 isolated finds. Of the 9 cultural resource sites, 1 was determined to be outside the project area, 1 was not relocated, and 2 were in an area that would not be impacted by Zone 4 construction or subsequent disposal activities. Significance testing was recommended and conducted for the remaining 5 cultural resource sites. Only 1 cultural resource site was determined to be significant, and it was recommended as eligible for listing on the California Register of Historical Resources (California Register). The California Register eligibility resulted in an archaeological excavation program to recover important site data in order to answer regionally important research questions. The conclusions of this additional archaeological research were consistent with the findings of Final EIR No. 575, which concluded the GDP would result in significant impacts to archaeological resources and that mitigation was required.

Impacts to archaeological resources were already analyzed in Final EIR No. 575 as well as in the more recent investigations discussed above, and the proposed Project would not result in any new significant impacts or more severe impacts to archaeological resources beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the Landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. Due to the static nature of cultural resources in the landscape, the archaeological conditions on the Project site would be consistent with those identified in Final EIR No. 575. Implementation of mitigation measures from Final EIR No. 575 would reduce potential impacts of the proposed Project to below the threshold of significance. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to archaeological resources, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact is presented during the scoping process.**

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP result in a less than significant impact related to the potential to disturb any human remains, including those interred outside of dedicated cemeteries. No known human remains are interred on the Project site. In the unlikely event that human remains are encountered during Project grading, the proper authorities would be notified and standard procedures for the respectful handling of human remains during earthmoving activities would be adhered to in compliance with State Health and Safety Code Section 7050.5 and Public Resources Code (PRC) Section 5097.98. Impacts to archaeological resources (i.e., prehistoric human remains) were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to archaeological resources beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the landfill development areas previously analyzed in Final EIR No. 575. **Since this topic was fully analyzed in**

Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.

4.6 GEOLOGY AND SOILS

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

- a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
 - ii. Strong seismic ground shaking?*
 - iii. Seismic-related ground failure, including liquefaction?*
 - iv. Landslides?*

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to geology and soils after the implementation of mitigation measures. The Project site is in southern California, which is a seismically active region. The Project site is not within a mapped Alquist-Priolo Earthquake Fault Zone. However, the Project site is in an area with known earthquake faults. The eastern half of the Landfill is crossed by a series of normal faults associated with the Cristianitos fault, which is located

near the eastern limit of Zone 4. Branches of the Cristianitos fault include the Forster fault, which crosses through the center of the Zone 4, and several other unnamed synthetic and antithetic faults that also cross Zone 4. No significant faulting has been mapped in the Zone 1 area of the Landfill. Final EIR No. 575 found that the Landfill site is not subject to seismic-related ground failure, including liquefaction. The entire landfill site is known to have landslide formations, which were extensively analyzed in Final EIR No. 575. Impacts to geology and soils were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to geology and soils beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the Landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the Breccia removal, the limits of excavation do not exceed the excavation limits previously analyzed in Final EIR No. 575. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to geology and soils, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to geology and soils after the implementation of mitigation measures. During Project construction, soil on the Project site would be exposed and there would be an increased potential for soil erosion compared to existing conditions. The removal of San Onofre Breccia material from Zone 4 may result in temporarily increased soil erosion and areas of exposed soil. In addition, during a storm event, soil erosion could occur at an accelerated rate. The potential for erosion during Project operations would be minimal because temporary impact areas on the Project site would be stabilized through revegetation or other means. Impacts to geology and soils were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to geology and soils beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the Breccia removal, the limits of excavation do not exceed the excavation limits previously analyzed in Final EIR No. 575. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to geology and soils, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

- c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to geology and soils after the implementation of mitigation measures. Refer to Response 3.7.a, above. Final EIR No. 575 found that the Landfill site is not subject to lateral spreading, subsidence, liquefaction, or collapse. The entire landfill site is known to have landslide formations, which were extensively analyzed in Final EIR No. 575. Impacts to geology and soils were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to geology and soils beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the Landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the Breccia removal, the limits of excavation do not exceed the excavation limits previously analyzed in Final EIR No. 575. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to geology and soils, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

- d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?*

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact as a result of expansive soils. Final EIR No. 575 found that the Landfill site contains a minimal amount of expansive soils that is not anticipated to result in any significant impacts to the Landfill development. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts related to expansive soils, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.** .

- e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

No Impact. Final EIR No. 575 found that the construction and operation of the GDP would result in no impacts to soils from the use of septic systems. The proposed Project would not include the use of septic tanks or alternative methods for disposal of wastewater into subsurface soils. Currently, the site is served by portable toilets and a septic tank system that have not resulted in any impacts to on-site soils. The proposed Project would not result in any impacts related to septic tanks or alternative wastewater disposal methods. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic**

will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to paleontological resources after the implementation of mitigation measures. According to Final EIR No. 575, the San Onofre Breccia is sensitive for paleontological resources. Final EIR No. 575 determined that any grading, earthmoving or excavation activities for the construction of the circulation improvements under the 2001 GDP could impact paleontological resources. In particular, grading, earthmoving and excavation for the circulation improvements, including the extension of La Pata Avenue and the construction of the internal road system, could result in removal or destruction of paleontological resources on the site. These impacts were found to be significant and mitigation was required. Due to the static nature of paleontological resources in the landscape, the paleontological conditions of the proposed Project would be consistent with those identified in Final EIR No. 575. Implementation of Mitigation Measures from Final EIR No. 575 would reduce potential impacts to below the threshold of significance. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

4.7 HAZARDS AND HAZARDOUS MATERIALS

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

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact hazard to the public or the environment through the routine transport, use or disposal of hazardous materials after the implementation of mitigation measures. As analyzed in Final EIR No. 575, the Prima Deshecha Landfill is a solid waste landfill that does have the potential to accept household hazardous waste materials that are mixed in with regular commercial and residential solid waste. However, the amount of household hazardous waste materials disposed in the landfill is limited by the following: (1) the majority of solid waste materials received at the Landfill is first processed at materials recovery facilities/transfer stations, where household hazardous waste materials are removed from the waste stream; (2) the landfill fee booth will reject any loads for disposal that may appear to be carrying hazardous waste materials; and (3) the landfill has a load check program where haulers are randomly selected to dispose of their loads in a segregated area so that their waste loads can be closely inspected for any potentially hazardous waste materials. Hazardous waste materials that are

collected are temporarily stored on site and then transported for proper off-site disposal in accordance with all federal, State, and local requirements. Impacts from hazards and hazardous materials were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to hazards and hazardous materials beyond what was previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the operation of a new SSO recycling facility, it is anticipated that any use of hazardous materials for this facility will be minimal, with their storage and use in compliance with all federal, State, and local requirements. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to hazards and hazardous materials, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment after the implementation of mitigation measures. As analyzed in Final EIR No. 575, the Prima Deshecha Landfill is a solid waste landfill that does have the potential to accept household hazardous waste materials that are mixed in with regular commercial and residential solid waste. However, the amount of household hazardous waste materials disposed in the Landfill is limited by the following: (1) the majority of solid waste materials that are received at the Landfill is first processed at materials recovery facilities/transfer stations, where household hazardous waste materials are removed from the waste stream; (2) the landfill fee booth will reject any loads for disposal that may appear to be carrying hazardous waste materials; and (3) the Landfill has a load check program where haulers are randomly selected to dispose of their loads in a segregated area so that their waste loads can be closely inspected for any potentially hazardous waste materials. Hazardous waste materials that are collected are temporarily stored on site and then transported for proper off-site disposal in accordance with all federal, State, and local requirements. Impacts from hazards and hazardous materials were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to hazards and hazardous materials beyond what was previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the operation of a new SSO recycling facility, it is anticipated that any use of hazardous materials for this facility will be minimal with their storage and use in compliance with all federal, State, and local requirements. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to hazards and hazardous materials, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. Final EIR No. 575 found that the construction and operation of the GDP would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school and therefore would result in no impacts. Since the time when Final EIR No. 575 was certified, San Juan Hills High School was built and is operational north of the Landfill site. San Juan Hills High School is located more than 0.25 mile north of the landfill site. There are no schools within 0.25 mile of the Landfill. As a result, the proposed Project would not emit hazardous emissions or handle hazardous materials within 0.25 mile of a school. No impacts would occur and no mitigation is required. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Final EIR No. 575 found that the Landfill site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.³ Therefore, neither construction nor operation of the proposed Project would pose a potential environmental concern to the surrounding area or result in any environmental violations associated with activities conducted at the Project site. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. Final EIR No. 575 found that the Landfill site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, the proposed Project would not result in a safety hazard or excessive noise to people residing or working in the Project site, and no mitigation is required. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

³ California Environmental Protection Agency (CalEPA). 2020. Cortese List: Section 65962.5(c). <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/> (accessed July 10, 2020).

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. Final EIR No. 575 found that the construction and operation of the GDP would not introduce new barriers or constraints on emergency response or evacuation. The proposed Project would not require or result in any long-term or permanent lane closures on roadways adjacent to the site. Therefore, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no mitigation is required. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact potentially exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires after the implementation of mitigation measures. According to the California Department of Forestry and Fire Protection (CAL FIRE) 2011 Very High Fire Hazard Severity Zone (VHFHSZ) Map for Unincorporated Orange County, the Project site is within a State Responsibility Area (SRA) non-VHFHSZ. This is consistent with the County's General Plan Safety Element Fire Hazard Severity Zones Map. However, according to CAL FIRE's California Fire Hazard Severity Zone Viewer (2020), the Project site is within a designated SRA VHFHSZ.⁴ In addition, according to both the CALFIRE 2020 Viewer and 2011 Very High Fire Hazard Severity Zone Map for Local Responsibility Area (LRA), the land to the east of the Landfill within San Clemente is designated as an LRA VHFHSV. Potential impacts from wildland fires were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts from wildland fires beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the Landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the operation of an SSO recycling facility, this facility will be designed, constructed, and operated in compliance with all State and Orange County Fire Authority codes and regulations for fire safety. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts from wildland fires, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

⁴ California Department of Forestry and Fire Protection (CAL FIRE). 2020. Fire Resources Assessment Program. California Fire Hazard Severity Zone Viewer. Website: <https://egis.fire.ca.gov/FHSZ/>.

4.8 HYDROLOGY AND WATER QUALITY

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

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to hydrology and water quality, specifically related to a potential violation of water quality standards or waste discharge requirements after the implementation of mitigation measures. Construction and operation of the proposed Project has the potential to introduce pollutants into receiving waters. The proposed Project would comply with the applicable National Pollutant Discharge Elimination System (NPDES) permits and implement construction and operational Best Management Practices (BMPs) to minimize pollutants of concern in stormwater runoff. Impacts to hydrology and water quality specifically related to a potential violation of water quality standards or waste discharge requirements were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to hydrology and water quality beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the Breccia removal, the limits of

excavation do not exceed the excavation limits previously analyzed in Final EIR No. 575. The existing landfill operation operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. The landfill storm water collection and control system consists of a series of concrete drainage channels, berms, and both earthen and concrete-lined desilting basins that are designed to control storm water runoff and protect water quality. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to hydrology and water quality, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. Final EIR No. 575 found that the construction and operation of the GDP would not result in any impacts related to decreasing groundwater supplies or interfering substantially with groundwater recharge. Although groundwater may be present in alluvial deposits beneath the Project site, the Project site is not located above a designated groundwater basin.⁵ Because the Project site is not located above a designated groundwater basin, the proposed Project would not decrease groundwater supplies, interfere with groundwater recharge, or impede sustainable groundwater management of a groundwater basin. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potential impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

c.i. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to hydrology and water quality, specifically as related to on- and off-site erosion and siltation, after the implementation of mitigation measures. Similar to the GDP that was analyzed in Final EIR No. 575, the proposed Project could result in direct effects to Prima Deshecha Cañada, which traverses the Project site from the northeast to the southwest. Therefore, the Project could alter the course of a stream or river. Additionally, similar to the GDP that was analyzed in Final EIR No. 575, both construction and operation of the proposed Project would involve ground-disturbing activities that could alter on-site drainage patterns and increase the potential for erosion and siltation. Similar to the GDP that was analyzed in Final EIR No. 575, the proposed Project could increase impervious surface area on the Project site, which could increase stormwater runoff from the Project site and increase the potential

⁵ California Department of Water Resources. Groundwater Basin Boundary Assessment Tool. Website: <https://gis.water.ca.gov/app/bbat/> (accessed June 17, 2020).

for on- and off-site erosion and siltation. The proposed Project would comply with the applicable NPDES permits and implement BMPs to reduce impacts to water quality, including those from erosion and siltation. Impacts to hydrology and water quality specifically related to a potential violation of water quality standards or Waste Discharge Requirements were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to hydrology and water quality, specifically from erosion and siltation, beyond what was previously analyzed in Final EIR No. 575 since all areas of the Project site fall within the Landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the Breccia removal, the limits of excavation do not exceed the excavation limits previously analyzed in Final EIR No. 575. The existing landfill operation operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. The landfill storm water collection and control system consists of a series of concrete drainage channels, berms, and both earthen and concrete-lined desilting basins that are designed to control stormwater runoff and protect water quality. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to hydrology and water quality, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

c.ii. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to hydrology and water quality specifically related to on- and off-site flooding after the implementation of mitigation measures. Similar to the GDP that was analyzed in Final EIR No. 575, the proposed Project could result in direct effects to Prima Deshecha Cañada and would also involve ground-disturbing activities that could alter on-site drainage patterns and increase the potential for flooding. In addition, similar to the GDP that was analyzed in Final EIR No. 575, the proposed Project could increase impervious surface area on the Project site, which could increase stormwater runoff from the Project site and increase the potential for on- and off-site flooding to occur. Impacts to hydrology and water quality specifically related to on- and off-site flooding were already analyzed in Final EIR No. 575. The proposed Project would not result in any new significant impacts or more severe impacts to hydrology and water quality, specifically from on- and off-site flooding, beyond what was previously analyzed in Final EIR No. 575. All areas of the proposed Project fall within the landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the Breccia removal, the limits of excavation do not exceed the excavation limits previously analyzed in Final EIR No. 575. The existing landfill operation operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. The landfill stormwater collection and control system consists of a series of concrete drainage channels, berms, and both earthen and concrete-lined desilting basins that are designed to control stormwater runoff and protect water quality. **Since this topic was fully analyzed**

in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to hydrology and water quality, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.

c.iii. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to hydrology and water quality, specifically related to the potential to create runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff, after the implementation of mitigation measures. As discussed in Responses 3.10(a) and 3.10(c)(ii) above, similar to the landfill development that was analyzed in Final EIR No. 575, the proposed Project has the potential to result in effects to the Prima Deshecha Cañada and to increase stormwater flow and discharge of pollutants. Impacts to hydrology and water quality specifically related to the potential to generate runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff were already analyzed in Final EIR No. 575. The proposed Project would not result in any new significant impacts or more severe impacts to hydrology and water quality beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the Breccia removal, the limits of excavation do not exceed the excavation limits previously analyzed in Final EIR No. 575. The existing landfill operation operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. The landfill stormwater collection and control system consists of a series of concrete drainage channels, berms, and both earthen and concrete-lined desilting basins that are designed to control stormwater runoff and protect water quality. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to hydrology and water quality, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

c.iv. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Less Than Significant Impact with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to hydrology and water quality, specifically as related to the alteration of the course of a stream or river in a manner that would impede or redirect flood flows, after the implementation of mitigation

measures. According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Numbers 06059C0507J and 06059C0526J (December 3, 2009), Zone A of the 100-year floodplain associated with Prima Deshecha Cañada traverses the Project site from the northeast to the southwest. The remainder of the Project site is within Zone X, areas of minimal flood hazard. Similar to the landfill development that was analyzed in Final EIR No. 575, the proposed Project could result in direct impacts to Prima Deshecha Cañada, primarily from the removal of San Onofre Breccia in Zone 4. Therefore, similar to the landfill development that was analyzed in Final EIR No. 575, the proposed Project could alter the existing drainage pattern of the site in a manner that could impede or redirect flood flows. Impacts to hydrology and water quality, specifically as related to the alteration of the course of a stream or river in a manner that would impede or redirect flood flows, were already analyzed in Final EIR No. 575, and the proposed Project would not result in any new significant impacts or more severe impacts to hydrology and water quality beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the Breccia removal, the limits of excavation do not exceed the excavation limits previously analyzed in Final EIR No. 575. The existing landfill operation operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. The landfill stormwater collection and control system consist of a series of concrete drainage channels, berms, and both earthen and concrete-lined desilting basins that are designed to control stormwater runoff and protect water quality. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to hydrology and water quality, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to hydrology and water quality, specifically related to flood hazard, tsunami, or seiche zones. The 100-year floodplain associated with Prima Deshecha Cañada traverses the Project site from the northeast to the southwest. Similar to the GDP that was analyzed in Final EIR No. 575, the proposed Project could result in direct impacts to Prima Deshecha Cañada, primarily from the removal of San Onofre Breccia in Zone 4. As such, similar to the GDP that was analyzed in Final EIR No. 575, the proposed Project could change the on-site flood hazard areas. However, the existing landfill operation operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. The landfill stormwater collection and control system consists of a series of concrete drainage channels, berms, and both earthen and concrete-lined desilting basins that are designed to control stormwater runoff and protect water quality.

According to the Safety Elements of the County of Orange General Plan, City of San Juan Capistrano General Plan, and City of San Clemente General Plan, the Project site is not located within a dam inundation area. Therefore, there is no risk of inundation from dam failure.

Seiching is a phenomenon that occurs when seismic ground shaking induces standing waves (seiches) inside open bodies of water such as lakes and reservoirs. Such waves can inundate adjacent areas or cause retention structures to fail, resulting in subsequent flooding of downstream properties. There are no unenclosed water retention facilities in the vicinity of the Project site; therefore, the Project site is not subject to inundation from seiche.

Tsunamis are generated ocean wave trains generally caused by tectonic displacement of the seafloor associated with shallow earthquakes, seafloor landslides, rockfalls, and exploding volcanic islands. According to the Orange County Tsunami Inundation Maps, the Project site is not in a tsunami inundation area.⁶

In conclusion, no impacts would occur related to release of pollutants from inundation from tsunamis or seiche, and no mitigation is required. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potential impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant with Mitigation Incorporated. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to hydrology and water quality, specifically as related to conflicting or obstructing the implementation of a water quality management plan, after the implementation of mitigation measures. Similar to the GDP that was analyzed in Final EIR No. 575, the Project site is within the jurisdiction of the San Diego RWQCB. The San Diego RWQCB adopted a Water Quality Control Plan (i.e., Basin Plan) (September 1994, with amendments effective on or before May 2016), which designates beneficial uses for all surface and groundwater within its jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As discussed in Threshold 3.10(a) above, similar to the GDP that was analyzed in Final EIR No. 575, the proposed Project has the potential to impact water quality. The proposed Project would comply with the applicable NPDES permits and implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff. Impacts to hydrology and water quality, specifically as related to conflicting or obstructing the implementation of a water quality management plan, were already analyzed in Final EIR No. 575. The proposed Project would not result in any new significant impacts or more severe impacts to hydrology and water quality beyond what was previously analyzed in Final EIR No. 575 since all areas of the proposed Project fall within the landfill development areas previously analyzed in Final EIR No. 575; therefore, no new or additional mitigation is required. While the proposed Project does include the Breccia removal, the limits of excavation do not exceed the excavation limits previously analyzed in Final EIR No. 575. The existing landfill operation operates in compliance with Waste Discharge

⁶ California Department of Conservation. Orange County Tsunami Inundation Maps. Website: <https://www.conservation.ca.gov/cgs/tsunami/maps> (accessed June 17, 2020).

Requirements issued by the California RWQCB, San Diego Region. The landfill storm water collection and control system consists of a series of concrete drainage channels, berms, and both earthen and concrete-lined desilting basins that are designed to control storm water runoff and protect water quality.

The Sustainable Groundwater Management Act (SGMA) was enacted in September 2014. SGMA requires governments and water agencies of high- and medium-priority basins to halt overdraft of groundwater basins. Specifically, SGMA requires the formation of local Groundwater Sustainability Agencies (GSAs), which are required to adopt Groundwater Sustainability Plans (GSPs), or an approved alternative to a GSP, to manage the sustainability of groundwater basins in California. As discussed in Threshold 3.10(b) above, similar to the landfill development that was analyzed in Final EIR No. 575, the Project site is not located above a designated groundwater basin. Therefore, there is not an applicable GSP applicable to the Project site. As such, the proposed Project would not conflict with or obstruct the implementation of a sustainable groundwater management plan. As such, conflict with or obstruction of the implementation of a sustainable groundwater management plan will not be addressed in the Supplemental EIR.

Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts to hydrology and water quality, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.

4.9 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project physically divide an established community?

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to land use and planning. The Landfill is located in the western foothills of the Santa Ana Mountains and is partially within San Juan Capistrano (570 acres), San Clemente (133 acres) and unincorporated Orange County (827 acres). The Landfill has been in operation since 1976, and while residential communities have been developed around it since then, the use on the Landfill property, which is a landfill operation, has not changed. The County of Orange General Plan designation for the Landfill site is 4LS, which is a public facility with a landfill site overlay. In August 2016, the La Pata Gap Extension opened, consisting of a road built through the Landfill property, connecting San Clemente and San Juan Capistrano. Similar to the GDP that was analyzed in Final EIR No. 575, the Project would not physically divide an established community. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potential impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to land use and planning. In 2007, the Prima Deshecha Landfill was included in SSHCP. Operation and expansion of the Prima Deshecha Landfill (including all activities in the 2001 GDP) are covered activities under the SSHCP. Further all proposed Project components would occur within Zones 1 and 4 and not within “supplemental open space” areas designated in the HCP, which are designated for habitat restoration. OCWR is in full compliance with all SSHCP requirements; therefore, the proposed Project would not result in any conflicts or impacts to the SSHCP. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potential impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

4.10 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. Final EIR No. 575 found that the construction and operation of the GDP would not result in any impacts to mineral resources that would be of value to the region and the residents of the State. The landfill development that was analyzed in Final EIR No. 575 has been in continuous operation since 1976. The implementation of the proposed Project falls within the same footprint boundary as the landfill development that was analyzed in Final EIR No. 575; therefore, no new impacts to mineral resources would occur. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. Final EIR No. 575 found that the construction and operation of the GDP would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. The landfill development that was analyzed in Final EIR No. 575 has been in continuous operation since 1976. The implementation of the proposed Project falls within the same footprint boundary as the landfill development that was analyzed in Final EIR No. 575; therefore, no new impacts to mineral resources would occur. The primary use of the site is not mineral extraction. According to the Orange County General Plan, the site of the Project is currently designated for landfill operations, which may include materials recovery, recycling facilities, and accessory uses (e.g., borrow site areas, buffer areas, access roads). The Project would not result in the loss of a known locally important mineral resource, and impacts from materials recovery operations would result in no impacts to mineral resources. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

4.11 NOISE

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

- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Potentially Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact to noise levels in the vicinity of the landfill after the implementation of mitigation measures. Similar to the landfill development that was analyzed in Final EIR No. 575, Project construction would require the use of heavy machinery and construction equipment. However, the San Onofre Breccia component of the proposed Project would require blasting of the San Onofre Breccia rock formation and the pulverizing of the excavated rock. Both of these activities would occur over an approximate 20-year period. This potential noise impact was not previously analyzed in Final EIR No. 575 and will therefore be analyzed in the Supplemental EIR. Blasting and pulverizing construction activities would occur during the daytime only, during regular landfill operating hours from 7:00 a.m. to 5:00 p.m. In addition, construction and operation of the proposed Project could increase vehicle trips to and from the Landfill, which could increase noise along nearby roads not previously analyzed in Final EIR No. 575 or cause an increase in severity of a previously identified impact from noise. **This topic will be analyzed in the Supplemental EIR, and mitigation will be developed and included in the Supplemental EIR, if necessary, to address potentially significant adverse Project effects related to potential increases in ambient noise levels due to blasting and pulverizing associated with San Onofre Breccia rock excavation and removal and truck noise along haul routes and Project construction noise in adjacent sensitive habitat beyond those levels previously analyzed in Final EIR No. 575.**

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact from excessive groundborne vibration or groundborne noise levels, after the implementation of mitigation measures. Similar to the landfill development that was analyzed in Final EIR No. 575, Project construction would require the use of heavy machinery and construction equipment. However, the San Onofre Breccia component of the proposed Project would require blasting of the San Onofre Breccia rock formation and the pulverizing of the excavated rock. Both of these activities would occur over an approximate 20-year period. This potential groundborne noise and groundborne vibration impact was not previously analyzed in Final EIR No. 575 and will therefore be analyzed in the Supplemental EIR. Blasting and pulverizing construction activities will occur during the daytime only, during regular landfill operating hours from 7:00 a.m. to 5:00 p.m. **This topic will be analyzed in the Supplemental EIR, and mitigation will be developed and included in the Supplemental EIR, if necessary, to address potentially significant adverse Project effects related to temporary and permanent potential increases in groundborne vibration or groundborne noise levels beyond those levels previously analyzed in Final EIR No. 575.**

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. Final EIR No. 575 found that the Landfill operation would not be located within the vicinity of a private airstrip or an airport land use plan. Similarly, the Project site is not located within 2 miles of a public airport or public use airport, and it would not expose people residing or working in the area to excessive noise levels. As a result, no significant impacts would occur, and no mitigation is required. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

4.12 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

No Impact. Final EIR No. 575 found that the construction and operation of the GDP would result in no impacts to population and housing. Similar to the landfill development project that was analyzed in Final EIR No. 575, the proposed Project does not include construction of new homes and does not include extension of roads or other infrastructure to previously undeveloped areas. Therefore, the proposed Project would not create a permanent increase in population or an increased demand for housing in the County or the region. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

- b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. Final EIR No. 575 found that the construction and operation of the GDP would result in no impacts to population and housing. Similar to the landfill development project that was analyzed in Final EIR No. 575, there is no housing on the Project site; therefore, the proposed Project would not displace people or housing. There would be no impacts related to the displacement of substantial numbers of people from their homes. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

4.13 PUBLIC SERVICES

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

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- i. Fire protection?*
- ii. Police protection?*
- iii. Schools?*
- iv. Parks?*
- v. Other public facilities?*

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to fire protection, police protection, schools, parks or other public facilities. Similar to the landfill development that was analyzed in Final EIR No. 575, the proposed Project does not include construction of governmental facilities, new homes, or businesses. Similar to the landfill development that was analyzed in Final EIR No. 575, the proposed Project is not anticipated to affect the population within the surrounding area. The proposed Project would not introduce new facilities requiring fire protection because the new SSO recycling facility would be constructed within the existing Landfill boundary. Similar to the landfill development that was analyzed in Final EIR No. 575, no additional police protection would be required because OCWR provides security on site and public access is limited, No additional schools, parks, or other public facilities would be required because no changes in area population would occur as a result of the proposed Project. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potential impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

4.14 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to recreation. Similar to the landfill development that was analyzed in Final EIR No. 575, the proposed Project would not increase the population in the vicinity of the landfill such that there would be an increase in the use of existing parks or other recreational facilities. Similar to the landfill development that was analyzed in Final EIR No. 575, the proposed Project would not result in any significant impacts to recreational resources since the proposed Project would not result in any homes being built. In addition, the proposed Project would not directly or indirectly impact any existing recreational facilities. OCWR currently maintains a multi-use recreational trail on the Landfill site that connects the City of San Juan Capistrano trail system to the City of San Clemente trail system. OCWR will continue to maintain this trail on the Landfill property in the future. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potential impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the GDP would result in a less than significant impact to recreation. Similar to the landfill development that was analyzed in Final EIR No. 575, the proposed Project does not include recreational facilities or require the construction or expansion of recreational facilities. OCWR currently maintains a multi-use recreational trail on the Landfill site that connects the City of San Juan Capistrano trail system to the City of San Clemente trail system. OCWR will continue to maintain this trail on the Landfill property in the future. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potential impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

4.15 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3 ⁷ or will conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact to transportation and would not create conflicts with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Similar to the GDP that was analyzed in Final EIR No. 575, the proposed Project would not include construction or removal of public roads or other circulation system features. In addition, similar to the landfill development that was analyzed in Final EIR No. 575, the proposed Project would not result in any changes to transit, bicycle, or pedestrian facilities, and no impacts would result from Project operation. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potential impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

⁷ State CEQA Guidelines Section 15064.3(c) provides that a lead agency “may elect to be governed by the provisions” of the section immediately; otherwise, the section’s provisions apply July 1, 2020. Here, the County has not elected to be governed by Section 15064.3. Accordingly, an analysis of vehicles miles traveled (VMT) is not necessary to determine whether a proposed project will have a significant transportation impact.

- b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 or will conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact to transportation. Section 15064.3 of the State CEQA Guidelines codifies that project-related transportation impacts are typically best measured by evaluating the project's vehicle miles traveled (VMT). Specifically, Subdivision (b) focuses on specific criteria related to transportation analysis and is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. Subdivision (b)(1) provides guidance on determining the significance of transportation impacts of land use projects using VMT; projects within 0.5 mile of a major transit stop/high-quality transit corridor should be considered to have a less than significant impact. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(3) acknowledges that Lead Agencies may not be able to quantitatively estimate VMT for every project type; in these cases, a qualitative analysis may be used. Subdivision (b)(4) stipulates that Lead Agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT. The provisions of State CEQA Guidelines Section 15064.3 become applicable statewide beginning July 1, 2020.

The proposed Project is neither a land use project nor a transportation project. It would not result in any long-term changes to traffic or circulation and would not develop any new land uses that would contribute to traffic congestion within the area, as operation and maintenance activities associated with the Landfill would not appreciably change in intensity or frequency. Neither construction nor operation of the proposed Project would result in additional passenger vehicle trips or include trip-inducing uses for regional daily VMT. **This topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

- c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

No Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would not result in any hazards due to a geometric design feature or incompatible uses. Similar to the landfill development analyzed in Final EIR No. 575, the proposed Project would not include any new roadways or improvements to existing roadways and infrastructure. Therefore, the proposed Project would not result in hazardous geometric design features or incompatible uses. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would not result in inadequate emergency access. Similar to the landfill development analyzed in Final EIR No. 575, for the proposed Project, site access to the Landfill is limited to Avenida La Pata. In accordance with the Memorandum of Understanding with the City of San Clemente, haulers utilizing the Landfill for refuse disposal cannot use Camino De Los Mares as an access route. Construction would not prevent emergency access to and from the Landfill from Avenida La Pata. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

4.16 UTILITIES AND SERVICE SYSTEMS

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

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in less than significant impacts related to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Similar to the landfill development analyzed in Final EIR No. 575, the proposed Project will be served by existing utility service providers for water, power, and natural gas. No significant impacts will occur. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact related to the landfill development's water consumption, thereby not resulting in any significant impacts to the availability of water supplies or impacting the water purveyor's ability to supply water. Similar to the

landfill development analyzed in Final EIR No. 575, the proposed Project will be served by the existing water service provider. No significant impacts will occur. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would result in no impacts to the existing wastewater treatment provider. Similar to the landfill development analyzed in Final EIR No. 575, the proposed Project will be served by existing service providers. No new significant impacts will occur. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would not result in any impacts from solid waste generation or to solid waste landfills. Similar to the landfill development analyzed in Final EIR No. 575, the proposed Project will not result in any impacts to solid waste generation or solid waste landfills. The proposed Project will facilitate the existing landfill development analyzed in Final EIR No. 575, and the landfill will continue to serve the solid waste landfill needs of the regional area. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. Refer to Response 3.19.d above. Final EIR No. 575 found that the construction and operation of the Landfill through completion of the GDP would not result in any impacts regarding compliance with federal, State, and local management and reduction statutes and regulations related to solid waste. The proposed Project will also comply with all federal, State and local management and reduction statutes and regulations related to solid waste. In addition, the proposed Project will result in the development of a source-separated organic waste recycling

facility that will recycle food waste, thereby assisting Orange County cities with the implementation of State-mandated organic waste recycling programs. **Since this topic was fully analyzed in Final EIR No. 575 and the Project will not result in any new significant impacts or more severe impacts, this topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

4.17 MANDATORY FINDINGS OF SIGNIFICANCE

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

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. CEQA specifies that certain findings, if found to be affirmative, require that a determination of significant impact be made. As discussed in Section 3.4, Biological Resources, the proposed Project does not have the potential to degrade the quality of the environment, have a significant impact on habitats of fish or wildlife species or cause a fish or wildlife population to drop below self-sustaining levels, and/or threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal, after the implementation of mitigation measures that have already been or will be implemented for the landfill development project previously analyzed in Final EIR No. 575. In addition, as discussed in Section 3.5, the proposed Project would not impact archaeological resources after the implementation of mitigation measures that have already been implemented for the landfill development project. **This topic will not be analyzed further in the Supplemental EIR unless new information identifying it as a potentially significant impact not previously analyzed by Final EIR No. 575 is presented during the scoping process.**

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

Potentially Significant Impact. A significant impact may occur if the proposed Project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately but would be significant when viewed together. Due to the potentially significant impacts identified in various sections (including Sections 3.1 Aesthetics, 3.3 Air Quality, and 3.13 Noise), cumulatively considerable impacts could result from implementation of the Project. **This topic will be analyzed in the Supplemental EIR and, if necessary, mitigation will be developed and included in the Supplemental EIR to address potentially significant adverse Project effects beyond what was analyzed in Final EIR No. 575.**

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Potentially Significant Impact. A significant impact may occur if environmental effects related to the proposed Project could cause substantial direct or indirect adverse impacts to human beings as described in the checklist responses. Refer to Response 3.21.b, above, for a reference to all sections contained in this Initial Study that are anticipated to have a potentially significant impact as a result of the proposed Project. **This topic will be analyzed in the Supplemental EIR and, if necessary, mitigation will be developed and included in the Supplemental EIR to address potentially significant adverse Project effects beyond what was analyzed in Final EIR No. 575.**

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ATTACHMENT A

PUBLIC COMMENTS

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NATIVE AMERICAN HERITAGE COMMISSION

July 27, 2020

Kevin Gaxiola
Orange County Waste & Recycling
601 North Ross Street, Floor 5
Santa Ana, CA 92701

Re: 1999041035, Prima Deshecha General Development Plan – Zone 4 Landfill Construction Projects and Source Separated Organics Recycling Facility Project, Orange County

Dear Mr. Gaxiola:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Meri Lopez-Keller
Luiseño

PARLIAMENTARIAN
Russell Altebery
Karuk

COMMISSIONER
Marshall McKay
Wintun

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Julie Tumamall-Stenslie
Chumash

COMMISSIONER
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Pomo

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AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
- a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

Arnau, John [OCWR]

From: Arnau, John [OCWR]
Sent: Wednesday, July 29, 2020 3:41 PM
To: Gaxiola, Kevin [OCWR]; Halligan, Aimee [OCWR]
Cc: Alonso, Irene [OCWR]
Subject: RE: Prima Deshecha landfill public information hearing questions
Attachments: NOP Notice posted with OC Clerk-Recorder.pdf

Kevin, for the second question, please indicate to Brenda that the NOP letter that was sent out incorrectly included a listing of environmental topics to be studied for a different project. The correct NOP letter, which is attached, indicates that currently, for the proposed Prima Supplemental EIR, OCWR is proposing to analyze aesthetics, air quality (which will include a health risk assessment and odor assessment) and noise & vibration. To gain a better understanding of why OCWR chose these environmental topics as the topics that will be analyzed in the Draft Supplemental EIR, she can review the NOP Initial Study, that is included on the OCWR website. Once the Draft Supplemental EIR has been completed (in approximately six months), it will be placed on OCWR's website where it can be reviewed (i.e., we can inform Brenda once we have posted the Draft Supplemental EIR on the OCWR website). The Supplemental EIR will analyze aesthetics, air quality and noise & vibration and will determine if the proposed project will result in any potential significant impacts to these environmental topics and/or to the public.

Kevin, I don't understand Brenda's first question. Perhaps we can email back the answer to her second question and she can provide some additional clarification for the first question.

From: Gaxiola, Kevin [OCWR] <kevin.gaxiola@ocwr.ocgov.com>
Sent: Wednesday, July 29, 2020 2:41 PM
To: Arnau, John [OCWR] <john.arnau@ocwr.ocgov.com>; Halligan, Aimee [OCWR] <aimee.halligan@ocwr.ocgov.com>
Cc: Alonso, Irene [OCWR] <irene.alonso@ocwr.ocgov.com>
Subject: Fw: Prima Deshecha landfill public information hearing questions

John and Aimee, I received this question a few minutes ago. Not sure if we can formulate a response before the meeting tomorrow, but I assume it will be asked again during the meeting if no response is provided.

From: Brenda <nashfamily@mindspring.com>
Sent: Wednesday, July 29, 2020 2:34 PM
To: Gaxiola, Kevin [OCWR] <kevin.gaxiola@ocwr.ocgov.com>
Subject: Prima Deshecha landfill public information hearing questions

Attention: This email originated from outside the County of Orange. Use caution when opening attachments or links.

Hi Kevin,
I am a resident in San Juan Capistrano and have some questions that I am hoping you (or someone else) can answer regarding the landfill project:

1. What would be the contraindications for the proposed Prima Deshecha landfill construction project?
2. Regarding the probable environmental effects that were listed on page 2 of the meeting notice, what is the radius that can result in impacts related to air quality, greenhouse gas emissions, hazardous materials, water quality and the other items that were listed on the public information meeting notice?

Thank you,
Brenda Nash



NOTICE OF PREPARATION OF A SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT AND NOTICE OF A SCOPING MEETING

DATE: July 23, 2020
SUBJECT: Notice of Preparation of a Supplemental EIR and Notice of a Scoping Meeting
PROJECT: Zone 4 Landfill Construction Projects and Source Separated Organics Facility
APPLICANT: OC Waste & Recycling, 601 North Ross Street, 5th Floor, Santa Ana, CA 92701

Notice is hereby given pursuant to Sections 15082 and 15163(c) of the State California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations, Title. 14, §15000 et seq.) that the County of Orange (County) has determined that a Supplemental Environmental Impact Report (SEIR) is the appropriate environmental document for the proposed Zone 4 Landfill Construction Projects and Source Separated Organics Facility Project (Project). The County will be the Lead Agency for the proposed Project and will be responsible for the SEIR's preparation pursuant to CEQA and the State CEQA Guidelines. The proposed Project's description and location and a list of probable environmental effects are provided below.

As required by Section 15082 of the State CEQA Guidelines, this Notice of Preparation (NOP) has been prepared and distributed to solicit comments from potential Responsible and Trustee Agencies on Project-related concerns relevant to each agency's statutory responsibilities. Comments on the content and scope of the SEIR also are solicited from any other interested parties (including other agencies and affected members of the public). The SEIR will be the environmental document of reference for Responsible and Trustee Agencies when considering subsequent discretionary approvals.

PROPOSED PROJECT LOCATION

Prima Deshecha Landfill (Landfill) is owned by the County and operated by OC Waste & Recycling (OCWR). OCWR is a County department that is overseen by the Board of Supervisors. Prima Deshecha Landfill is 1,530 acres (ac) and is located in southeastern Orange County partially within San Juan Capistrano (570 ac), San Clemente (133 ac), and unincorporated Orange County (827 ac). The landfill is located at 32250 Avenida La Pata, and access is provided by the Golden State Freeway (Interstate 5 [I-5]), Ortega Highway (State Route 74 [SR-74]), and Avenida La Pata. The Prima Deshecha Landfill site is divided into five zones, called Zones 1 through 5. Zone 1 is the current landfilling area, with an estimated closure date of approximately 2050. Zone 4 is the future landfill development area, with an estimated closure date of approximately 2102.

PROPOSED PROJECT DESCRIPTION

The proposed Project includes the following components: (1) changes to the phasing of operations between Zone 1 and Zone 4 of the landfill to allow for concurrent operations.

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HUGH NGUYEN, CLERK-RECORDER

BY:  DEPUTY



blasting, excavation, on-site relocation, pulverizing into soil, soil stockpiling and off-site soil removal of hard rock material in Zone 4, referred to as the San Onofre Breccia area; (3) imported soil trips for liner installation that will occur for all future Zone 4 development phases; and (4) construction and operation of a Source Separated Organics (SSO) recycling facility.

PROBABLE ENVIRONMENTAL EFFECTS

Based on the Initial Study (IS) completed for the proposed Project, the County has determined that the proposed Project could result in impacts related to aesthetics, air quality, and noise. These topics will be analyzed in the SEIR. Mitigation will be developed and included in the SEIR, if necessary, to address the proposed Project's potentially significant adverse effects.

DOCUMENT AVAILABILITY

Copies of this NOP have been transmitted to the California State Clearinghouse of the Office of Planning and Research and to each applicable Responsible and Trustee Agency. Copies of this NOP, the IS, and future environmental documents prepared in conjunction with the proposed Project will be available for public review on the County's website at <http://www.oilandfills.com/events/prima-deshecha-virtual-public-meeting>.

NOTICE OF PREPARATION COMMENT PERIOD

The County invites you to submit written comments describing your specific environmental concerns, if any. The NOP comment period begins on July 23, 2020 and ends on August 21, 2020. Written comments must be received by 5:00 p.m. on August 21, 2020, the close of the public review period. Please send your written comments to Kevin Gaxiola, OC Waste & Recycling, 601 North Ross Street, 5th Floor, Santa Ana, CA 92701 or via email to kevin.gaxiola@ocwr.ocgov.com. Please include your name, address, and contact information in your correspondence.

PUBLIC SCOPING MEETING

To provide an additional opportunity for input, the County will be conducting a Scoping Meeting to present information about the proposed Project and to solicit comments relative to the content of the information to be analyzed in the SEIR. Due to restrictions related to the COVID-19 pandemic, the meeting will be conducted online. The Scoping Meeting will be held on Thursday, July 30, 2020, at 6:00 PM – 8:00 PM. To access the meeting, visit <http://www.oilandfills.com/events/prima-deshecha-virtual-public-meeting>.

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JUL 23 2020

HUGH NGUYEN, CLERK-RECORDER

BY:  DEPUTY

SAN JUAN CAPISTRANO
equestrian coalition

August 3, 2020

Kevin Gaxiola, Communications Specialist
OC Waste and Recycling
601 N Ross Street, 5th Floor
Santa Ana, CA 92701

Subject: Prima Deshecha Landfill

Dear Mr. Gaxiola:

Please accept this letter on behalf of the San Juan Capistrano Equestrian Coalition (SJCEC) in response to the County of Orange request for comments on the public review of the Notice of Preparation/Initial Study for the Supplemental EIR 2 to Final EIR 575 for the Prima Deshecha General Development Plan prepared for the Proposed Zone 4 Landfill Construction Projects and Organic Waste Recycling Facility Project, dated July 2020.

The mission of the Equestrian Coalition is to serve, protect and promote the interests of those who value equine ownership and activities as important aspects of our quality of life. The Coalition frequently represents the voice of the horse community at the city, county, and state levels to preserve the equestrian tradition and lifestyle.

San Juan Capistrano has long been known as the equestrian capital of Orange County. The equestrian community draws county-wide and local enthusiasts to the City of San Juan Capistrano. The horse ranches, training centers, and show facilities stimulate the local economy in revenues and jobs. According to an economic study conducted by Chapman University, the equestrian community contributes \$50.1 million to the City annually.

The Equestrian Coalition supports the construction and operation of the proposed 2-acre Source-Separated Organics (SSO) waste recycling facility for food waste mentioned in the Initial Study. We understand the goal of the SSO facility is to help Orange County Cities meet the State-mandated requirements for organic waste diversion targets. Organic waste, however, also includes manure and bedding from equestrian facilities.

SB 1383 (Lara) specifically discusses dairy and livestock organic waste and establishes methane emissions reduction targets in a statewide effort to reduce solid waste emissions. It established targets to achieve a 50% reduction in the level of statewide disposal of organic waste (from the 2014 level) by 2020 and a 75% reduction by 2025.

A recent EPA pilot study in Merced County looked into the benefits of mixing manure with green waste into a "co-compost". They found that the "co-compost" is good for the soil and the environment. Co-compost has the ability to help regenerate poor soils and reduce or eliminate

Mr. Kevin Gaxiola
August 3, 2020
Page 2 of 2

the need for chemical fertilizers. The farmers were able to cost effectively recycle their waste and reduce nitrate contamination of groundwater in the area. The cities were able to enhance the economic value of their compost, reduce the amount of material sent to the landfill, and provide an important service to their agricultural community.

According to a study done by the University of Pennsylvania regarding manure management, a typical 1,000 pound horse will generate 60 to 70 pounds of stall waste per day, consisting of approximately 51 pounds of manure and 15 to 20 pounds of bedding. This is a waste stream that has to be addressed.

We would like the County to consider the incorporation of an on-site manure and bedding composting facility in Zone 4 of the landfill that would complement the planned Source-Separated Organics (SSO) food waste recycling facility.

Modern technology already exists to build efficient manure and bedding composting facilities that are compliant with regulatory guidelines. The modern technology reduces odors by putting incoming waste into covered bays. An auger system adds oxygen and mixes in amendments, completing the process of creating organic soil in a matter of days. The certified organic soil can then be used by the community for farming, landscaping and pasture maintenance.

This clean manure and bedding recycling technology will help improve the health of residents, improve water quality, enhance soils and crop yields, reduce gas emissions, lower waste costs for horse owners and lessen the Tons Per Day (TPD) landfill impact of waste generated by horses.

Thank you for considering our request to include manure and bedding recycling to the EIR. Please contact me should you have any questions or comments.

Sincerely,

Dr. Julie Ryan-Johnson
CEO of the San Juan Capistrano Equestrian Coalition
Chair of the Manure Management Committee
P.O. Box 361
San Juan Capistrano, CA 92693
Tel. (949) 677-3454
jrjdvm@cox.net

cc: Supervisor Lisa A. Bartlett, 5th District.



RANCHO MISSION VIEJO

August 13, 2020

Mr. Kevin Gaxiola
OC Waste & Recycling
601 North Ross Street, 5th Floor
Santa Ana, CA 92701

Reference: Notice of Preparation for a Supplemental EIR for Zone 4 Landfill
Construction Projects & Source Separated Organics Facility

Subject: Rancho Mission Viejo Comments

Dear Mr. Gaxiola:

Thank you for providing Rancho Mission Viejo (RMV) with the opportunity to review and comment on the Notice of Preparation for a Supplemental EIR for the referenced project. RMV has reviewed the NOP and attached Initial Study (IS) and provides the following comments for your consideration in preparing the Supplemental EIR to EIR 575.

General Comment

Based on conversations with OCWR staff, RMV understands that the Source Separated Organics Facility is no longer being proposed at this time. Based on this understanding, RMV will not comment on this aspect of the NOP. However, we respectfully request that should the SOSF be re-proposed we be provided with an additional opportunity to comment on same.


Specific Comments

1. **Section 2.1.1 Surrounding Context**– In Section 2.1.1 of the IS, a description of the surrounding setting and partial list of surrounding uses is identified. In the SEIR, please identify San Juan Hills High School, Tierra Verde and Avenida La Pata as existing land uses and infrastructure. Also, in Figure 2-3, the areas labeled as “Rancho Mission Viejo Specific Plan” should be changed to “Rancho Mission Viejo Planned Community”.
2. **Figure 2-4 Jurisdictional Boundaries (pg. 2-11)** – This figure shows the city/county boundary and land use plan. The city boundary shown in red is missing a section of linework in the vicinity of Area 4LS. In the SEIR please clarify the relationship of the City of San Clemente boundary to that of the landfill. If a portion of the city boundary

- extends through the landfill property, please clarify the County's leadership role for administering land use and zoning in that portion of the landfill within the city.
3. **Section 2.2.1.2 San Onofre Breccia Removal** – Table 2.A on page 2-19 of the IS purports to show anticipated permits and authorizations, but nothing is shown regarding removal of the San Onofre Breccia. The SEIR should identify what, if any, permits are required from the State of California for the removal of the San Onofre Breccia via blasting.
 4. **Section 4.6 Geology and Soils (pg. 4-20 thru 4-23)** – The NOP indicates that blasting of 9 million CY of hard rock material, San Onofre Breccia, will be performed. However, the NOP indicates that the topic of Geology and Soils will not be analyzed further in the SEIR as new significant impacts or more severe impacts are not anticipated. The NOP is not clear on whether EIR 575 anticipated that the technique of blasting would be used in Zone 4. The SEIR should either: a) clarify that blasting was anticipated in EIR 575 and no new significant impacts are anticipated or, b) if blasting was not anticipated in EIR 575, analyze potential Geology and Soils impacts, specifically the potential impacts of blasting on the ancient/natural landslides in the area.
 5. **Section 4.11 Noise (pgs. 4-37 thru 4-38)** – The NOP describes blasting as occurring during the day for 20 years. The SEIR should describe the anticipated frequency, duration and decibels level of blasting and analyze the potential impacts of same on adjacent existing and future land uses.
 6. **Section 4.15 Transportation (pgs. 4-42 thru 4-44)** – Footnote 7 on page 4-42 of the IS cites Section 15064.3(c) of the State CEQA Guidelines regarding VMT to support a decision to scope out of the SEIR the further analysis of VMT. However, reliance on the referenced subsection (c) seems misplaced since the subsection pertains specifically to *when* Section 15064.3 (requiring a VMT analysis) should be applied, not *whether* it should be applied at all. Notwithstanding, there are other reasons to support a decision not to analyze VMT. Some of these are set forth on page 4-43 of the IS. There would also seem to be others, particularly since the proposed Project is being addressed in supplemental CEQA documentation where the scope of analysis is more limited (see, for example, CEQA Guidelines Sections 15162 and 15163). In any event, the IS goes on to state (on page 4-43) that operation of the proposed Project would not result in additional vehicle trips and that impacts on transportation would be less than significant; however, no actual numbers or analyses are offered in support of that conclusion. It would therefore seem appropriate to provide some support for the conclusions reached.

Should you have any questions regarding these comments, please contact me via email at lcoley Eisenberg@ranchomv.com or via telephone at (949) 240-3363 Ext. 297.

Sincerely,



Laura Coley Eisenberg
Senior Vice President, Open Space & Resource Management



August 19, 2020

Kevin Gaxiola
Orange County Waste & Recycling
601 North Ross Street, Floor 5
Santa Ana, CA 92701

Subject: SCH No. 1999041035 – Notice of Preparation for Prima Deshecha General Development Plan - Zone 4 Landfill Construction Projects and Source Separated Organics Recycling Facility – Orange County (Facility No. 30-AB-0019)

Dear Mr. Gaxiola:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

Orange County Waste & Recycling (OCWR), acting as Lead Agency, has prepared and circulated a Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (SEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed Prima Deshecha General Development Plan - Zone 4 Landfill Construction Projects and Source Separated Organics Recycling Facility (proposed project) is located at the Prima Deshecha Landfill (Landfill) which is owned by Orange County and operated by OCWR. OCWR is a County department that is overseen by the Orange County Board of Supervisors. Prima Deshecha Landfill is 1,530 acres (ac) and is located in southeastern Orange County; partially within San Juan Capistrano (570 ac), San Clemente (133 ac), and unincorporated Orange County (827 ac). The landfill is located at 32250 Avenida La Pata, and access is provided by the Golden State Freeway (Interstate 5 [I-5]), Ortega Highway (State Route 74 [SR-74]), and La Pata Avenue. The Prima Deshecha Landfill site is divided into five zones, called Zones 1 through 5. Zone 1 is the current landfilling area, with an estimated closure date of approximately 2050. Zone 4 is the future landfill development area, with an estimated closure date of approximately 2102.

The proposed Project includes the following components:

1. Changes to the phasing of operations between Zone 1 and Zone 4 of the landfill to allow for concurrent operations;

2. Blasting, excavation, on-site relocation, pulverizing into soil, soil stockpiling and off-site soil removal of hard rock material in Zone 4, referred to as the San Onofre Breccia area;
3. Imported soil trips for liner installation that will occur for all future Zone 4 development phases; and
4. Construction and operation of a Source Separated Organics (SSO) recycling facility.

COMMENTS

Revision to the Current Solid Waste Facility Permit

The proposed project includes the construction of an SSO recycling facility, which based on the description, may be regulated as a Large Volume In-vessel Digestion Facility, pursuant to Title 14, California Code of Regulations (CCR), Section 17896.2(a)(15) or a Large Volume Transfer/Processing Facility pursuant to Title 14 CCR Section 17402(a)(8). The incorporation of this activity may require a revision to the currently issued Solid Waste Facility Permit (Facility No. 30-AB-0019). As part of the revision, the Landfill's Joint Technical Document would need to be updated, including the addition of an In-Vessel Digestion Report, pursuant to Title 14 CCR, Section 17896.15, that meets the requirements of Title 14 CCR, Section 18221.6.1 or a Transfer/Processing Report, pursuant to Title 14 CCR, Section 17403.9, that meets the requirements of Title 14 CCR, Section 18221.6.

Solid Waste Regulatory Oversight

The Orange County Environmental Health Division, Local Enforcement Agency (LEA) is responsible for providing regulatory oversight of solid waste handling and disposal activities. Please contact the LEA, Kathy Cross, at 714.433.6270 or by e-mail at KCross@ochca.com to discuss solid waste requirements for the proposed project.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the NOP and hopes that this comment letter will be useful to the Lead Agency in preparing the SEIR and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6363 or by e-mail at Megan.Emslander@calrecycle.ca.gov.

NOP of an SEIR for Prima Deshecha Landfill (30-AB-0019)

August 19, 2020

Page 3 of 3

Sincerely,



Megan Emslander, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Ben Escotto, Supervisor
Permitting & Assistance Branch – South Unit

Kathy Cross, Supervisor
Orange County LEA



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

August 19, 2020

Kevin.gaxiola@ocwr.ocgov.com

Kevin Gaxiola
Orange County, Waste and Recycling Department
601 North Ross Street, 5th Floor
Santa Ana, CA 92701

Notice of Preparation of a Supplemental Environmental Impact Report for Zone 4 Landfill Construction Projects and Source Separated Organics Facility

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Supplemental Environmental Impact Report (EIR). Please send a copy of the Supplemental EIR upon its completion and public release directly to South Coast AQMD as copies of the Supplemental EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Supplemental EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁶, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy⁷.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

ORC200723-01

Control Number

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

⁷ Southern California Association of Governments' 2016-2040 RTP/SCS can be found at: http://scagrtpscs.net/Documents/2016/peir/final/2016fP EIR_ ExhibitB_MMRP.pdf.



ORANGE COUNTY FIRE AUTHORITY

P. O. Box 57115, Irvine, CA 92619-7115 • 1 Fire Authority Road, Irvine, CA 92602-0125

Brian Fennessy, Fire Chief

(714) 573-6000

www.ocfa.org

August 20, 2020

OC Waste & Recycling
Attn: Kevin Gaxiola
601 North Ross Street, 5th Floor
Santa Ana, CA 92701

Ref: Notice of Preparation of a Supplemental Environmental Impact Report and notice of a Scoping Meeting

Dear Kevin Gaxiola:

Thank you for the opportunity to review the subject document. The Orange County Fire Authority (OCFA) provides fire protection and emergency medical services response to the project area. Services include: structural fire protection, emergency medical and rescue services, education and hazardous material response. OCFA also participates in disaster planning as it relates to emergency operations, which includes high occupant areas and school sites and may participate in community disaster drills planned by others. Resources are deployed based upon a regional service delivery system, assigning personnel and equipment to emergency incidents without regard to jurisdictional boundaries. The equipment used by the department has the versatility to respond to both urban and wildland emergency conditions. The following are our comments:

We believe this project will have Less Than Significant Impact with the following Measures:

- The project is subject to review by the County and the OCFA for various construction document plan checks for the applicable fire life safety codes and regulations. The project will be subject to the current editions of the CBC, CFC and related codes.
- Ensure that proposed project receives appropriate OCFA permits for on-site activities such as Explosives/Blasting which include conditional Orange County Sheriff's Department approval.
- Structures may require to have automatic fire sprinkler systems designed per NFPA 13 as required in the current CBC, CFC.
- A water supply system to supply fire hydrants and automatic fire sprinkler systems is required. Fire flow and hydrant spacing shall meet the minimums identified in the codes. Please refer to the California Fire Code Appendix section. These tables are also located in OCFA Guideline B09, Attachment 23.

Kevin Gaxiola
August 20, 2020
Page 2

- It is unlawful to occupy any portions of this apartment building until City building department and OCFA have conducted final inspection and sign off.
- Ensure that proposed project meet California Fire Code, OCFA Fire Master Plans for Commercial & Residential Development (B-09/B-09a) Guideline, Fuel Modification (C-05) Guideline, and OCFA Architectural Review (E-04) Guideline.

In addition, we would like to point out that all standard conditions with regard to development, including water supply, built in fire protection systems, road grades and width, access, building materials, and the like will be applied to this project at the time of plan submittal. Thank you for providing us with this information. Please contact me at 714-573-6177 if you have any questions.

Sincerely,



William Blumberg
Management Assistant
Planning and Development
williamblumberg@ocfa.org

From: Rajagopal, Shyamala <SRajagopal@ochca.com>
Sent: Friday, August 21, 2020 11:13 AM
To: Gaxiola, Kevin [OCWR] <kevin.gaxiola@ocwr.ocgov.com>
Cc: Sharifian, Akbar <asharifian@ochca.com>
Subject: RE: SCH No. 1999041035 - NOP of SEIR Prima Deshecha Landfill Expansion (SWIS No. 30-AB-0019)

Hello Mr. Gaxiola,

Thank you for providing the Orange County – Environmental Health, LEA the opportunity to submit comments on the **Notice of Preparation (NOP)/Initial Study (SCH #1999041035)** for the new Prima Deshecha Landfill Supplemental EIR No. 2 that is being proposed for the Zone 4 Landfill Construction Projects and for your Agency’s consideration of these comments as part of the California Environmental Quality Act (CEQA) process. The Orange County Waste & Recycling (OCWR), acting as the Lead Agency, has prepared and circulated a NOP of a Supplemental Environmental Impact Report (SEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project. In response to the review of the document, attached are the comments from the LEA:

1. The LEA was notified that OCWR has decided to no longer pursue the construction and operation of the Source Separated Organic (SSO) Facility (one of the projects proposed in the Initial Study) at this time and will be dropped from the project description. It is our understanding that this will not be further analyzed in the Supplemental EIR. Therefore, LEA is not providing any specific comments related to this construction project. Please note that that the proposed SSO Facility is not a recycling facility but will be permitted by LEA and may be regulated either as a Large Volume In-Vessel Digestion Facility or as a Large Volume Transfer/Processing Facility. However, if OCWR decides to pursue with the construction of the facility in future, please coordinate and notify LEA such that we have the opportunity to review and comment on the project details as it may require revisions to the permit.
2. The proposed remaining construction projects (San Onofre Breccia Removal and Soil Import for Liner Installation) will result in additional truck traffic over the entire duration of the project. Is there a traffic impact study being done to address the increase in truck traffic with the proposed construction work? This does not appear to have been identified under Section 4.0 – Evaluation of Environmental Impacts (Transportation Study).

If you have any questions, please contact me by e-mail or at the phone number listed below.

Thank you,
Shyamala Rajagopal
Hazardous Materials Specialist
Environmental Health, LEA
Work Phone: (714) 433-6273
Cell Phone: (714) 614-0498
E-Mail: SRajagopal@ochca.com



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ATTACHMENT B

IS/NOP DISTRIBUTION LIST

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IS/NOP Distribution List

Delivery Type	Agency/Organization	First Name	Last Name	Title	Division / Title	Address	City	State	ZIP
REQUIRED									
Fedex	California Office of Planning and Research				State Clearinghouse	1400 Tenth Street	Sacramento	CA	95814
In Person	Orange County Clerk-Recorder					12 Civic Center Plaza, Room 101	Santa Ana	CA	92701
LEAD AGENCY									
Fedex	OC Waste & Recycling	Kevin	Oxford	Project Manager		601 North Ross Street, Floor 5	Santa Ana	CA	92701
STATE/FEDERAL									
SCH - NOC	California Air Resources Board								
SCH - NOC	California Dept of Transportation - District 12								
SCH - NOC	California Department of Conservation								
SCH - NOC	Energy Commission								
SCH - NOC	Dept. of Forestry and Fire Commission								
SCH - NOC	Native American Heritage Commission								
SCH - NOC	Office of Emergency Services								
SCH - NOC	California Natural Resources Agency								
SCH - NOC	State Water Resources Control Board								
SCH - NOC	Dept. of Resources Recycling and Recovery								
SCH - NOC	CA Dept. of Toxic Substances Control								
SCH - NOC	California Dept of Water Resources								
FedEx	US Fish and Wildlife Service	Jonathan	Snyder			2177 Salk Avenue, Suite 250	Carlsbad	CA	92008
FedEx	California Dept of Fish & Wildlife	Kyle	Rice	Environmental Scientist		3883 Ruffin Road	San Diego	CA	92123
USPS Flat Rate Priority with Delivery Confirmation	US Army Corps of Engineers				Planning Division	PO Box 532711	Los Angeles	CA	90053-2325
FedEx	Regional Water Quality Control Board	Amy	Grove			2375 Northside Drive, Suite 100	San Diego	CA	91765
Regional/Local									
FedEx	Solid Waste Local Enforcement Agency	Amy	Cross		HCA/Environmental Health Division	1241 E. Dyer Road, Suite 120	Santa Ana	CA	92705-5611
FedEx	South Coast Air Quality Management District				CEQA Review	21865 E. Copley Drive	Diamond Bar	CA	91765
FedEx	Orange County Fire Authority				CEQA Review	1 Fire Authority Road	Irvine	CA	92602
FedEx	City of San Juan Capistrano	Sergio	Klotz		Development Services Department	32400 Paseo Adelanto	San Juan Capistrano	CA	92675
FedEx	City of San Clemente	Jennifer	Savage		Community Development Department	910 Calle Negocio, Suite 100	San Clemente	CA	92673
FedEx	Santa Margarita Water District				CEQA Review	26111 Antonio Parkway	Rancho Santa Margarita	CA	92688
FedEx	San Diego Gas & Electric				CEQA Review	8335 Century Park Court	San Diego	CA	92123-1569
FedEx	Southern California Association of Governments				IGR/CEQA Review	900 Wilshire Blvd., Ste. 1700	Los Angeles	CA	90017
Interested Parties									
FedEx	Rancho Mission Viejo	Laura	Eisenberg			28811 Ortega Highway	San Juan Capistrano	CA	92675
Tribes (Coordinated with AB 52 List)									
USPS	Garieleno Band of Mission Indians - Kizh Nation	Andrew	Salas			PO Box 393	Covina	CA	91723
USPS	San Gabriel Band of Mission Indians	Anthony	Morales			PO Box 693	San Gabriel	CA	91778
USPS	Soboba Band of Luiseno Indians	Joseph	Ontiveros			PO Box 487	San Jacinto	CA	92581
USPS	Juaneno Band of Mission Indians	Joyce	Stanfield Perry			4955 Paseo Segovia	Irvine	CA	92603

