

CEQA INITIAL STUDY

INCREASE IN MAXIMUM DAILY OPERATIONS AT PRIMA DESHECHA LANDFILL

OCWR CEQA LOG #724

Prepared for:



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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
DAMP	Drainage Area Management Plan
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FY	Fiscal Year
GDP	General Development Plan
GHG	greenhouse gas
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HCP	Habitat Conservation Plan
HMMP	Habitat Mitigation and Monitoring Plan
I-5	Interstate 5
Landfill	Prima Deshecha Landfill
LEA	Local Enforcement Agency
LOS	level(s) of service

LPPE	Los Patrones Parkway Extension
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
MMRP	Mitigation, Monitoring, and Reporting Program
NCCP	Natural Community Conservation Plan
NPDES	National Pollutant Discharge Elimination System
OCPW	Orange County Public Works
OCWR	OC Waste & Recycling
PRC	Public Resources Code
Project	Increase in Maximum Daily Operations at Prima Deshecha Landfill
RELOOC	Regional Landfill Options for Orange County Strategic Plan
RWQCB	Regional Water Quality Control Board
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-74	State Route 74
SR-241	State Route 241
SRA	State Responsibility Area
SSHCP	Southern Subregion Habitat Conservation Plan
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

In accordance with the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*, this Initial Study has been prepared to evaluate the potentially significant impacts associated with implementing the proposed Increase in Maximum Daily Operations at Prima Deshecha Landfill (proposed Project). Pursuant to Section 15063(a) of the *State CEQA Guidelines*, 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 (*State 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.

The Initial Study is organized into the following chapters:

- Chapter 1: Introduction
- Chapter 2: Environmental Determination
- Chapter 3: Project Description
- Chapter 4: Environmental Evaluation
- Chapter 5: Summary of Mitigation Measures and Project Design Features
- Chapter 6: References

1.1 PROJECT TITLE

The Project title is the *Increase in Maximum Daily Operations at Prima Deshecha Landfill*.

1.2 LEAD AGENCY NAME | ADDRESS

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. OC Waste & Recycling (OCWR) is the County department sponsoring the Project. The contact information is:

County of Orange
OC Waste & Recycling
601 North Ross Street, 5th Floor
Santa Ana, California 92701

1.3 LEAD AGENCY CONTACT PERSON | TELEPHONE NUMBER | EMAIL

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

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Email: aimee.halligan@ocwr.ocgov.com

1.4 PROJECT LOCATION

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

1.5 PROJECT SPONSOR

The Project sponsor is OCWR, a County department that is overseen by the Orange County Board of Supervisors.

1.6 GENERAL PLAN | SPECIFIC PLAN DESIGNATION(S)

Existing land uses within the Landfill and the surrounding vicinity are shown in **Figure 2**. The Orange County General Plan designation for the unincorporated eastern portion of the Landfill is 4(LS), Public Facilities with a Landfill Site Overlay. The City of San Juan Capistrano has designated the western portion of the Landfill within its limits for Regional Park uses, and the City of San Clemente has designated the southern portion of the Landfill within its limits for Public Open Space uses.

1.7 ZONING DISTRICT(S)

As an active public facility, the Landfill is exempt from the Orange County Zoning Ordinance.

1.8 DESCRIPTION OF PROJECT

The Landfill is owned by the County and operated by OCWR. The proposed Project would increase the maximum daily tonnage receipt capacity of the Landfill from 4,000 tons per day (TPD) to 8,000 TPD. This increase in daily tonnage is anticipated to take place gradually, reaching the 8,000 TPD limit by 2030, and would be reflected in proposed Amendment No. 5 to the 2001 Prima Deshecha General Development Plan (GDP).

1.9 SURROUNDING LAND USE AND SETTING

Geographically the Landfill is located in the western foothills of the Santa Ana Mountains. Ground elevations range from 230 feet above mean sea level (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.

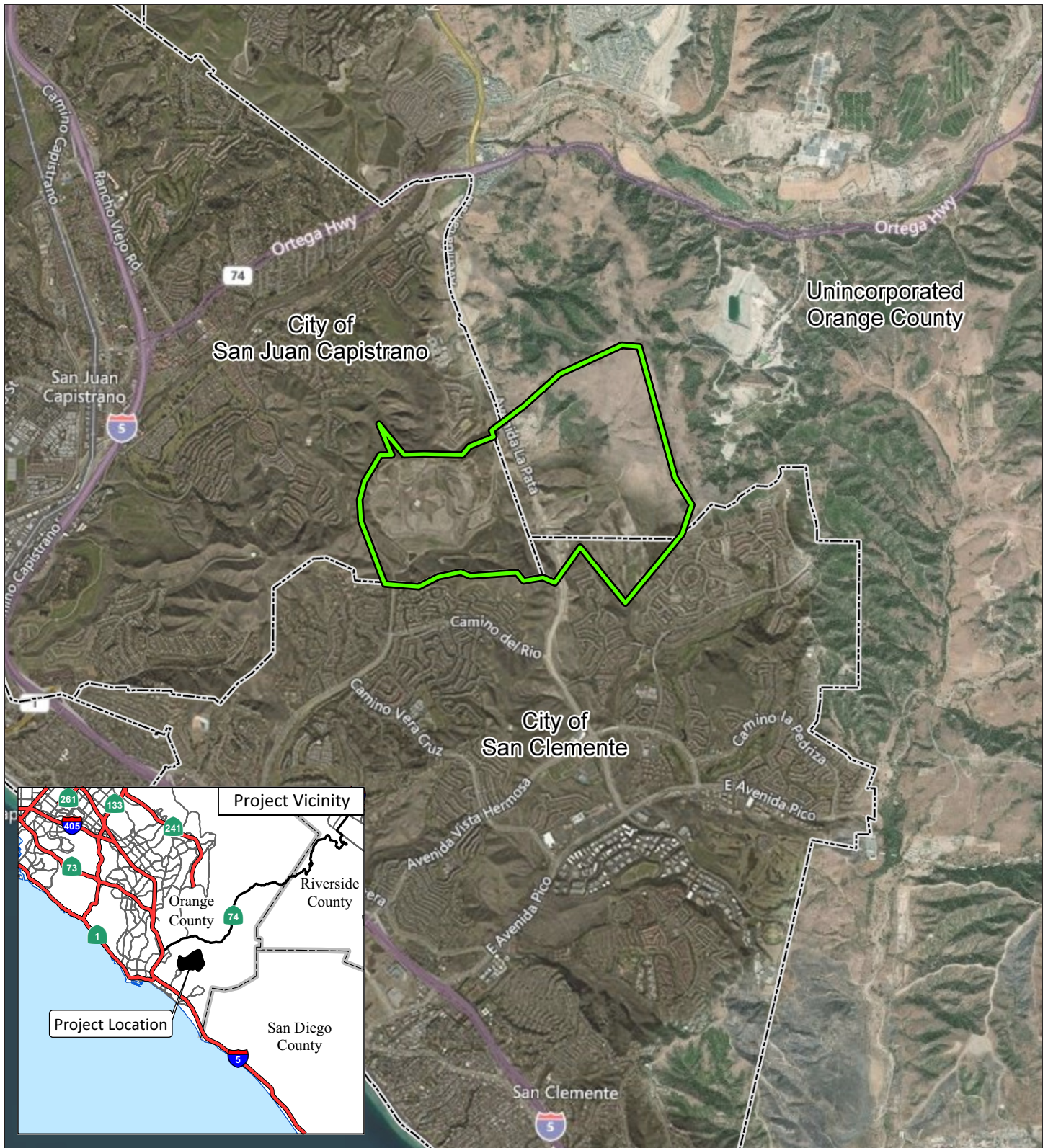

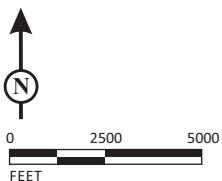


FIGURE 1

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LEGEND

 Prima Deshecha Landfill Boundary





SOURCE: Bing Maps

Increase in Maximum Daily Operations at Prima Deshecha Landfill
Project Location



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LEGEND

-  Prima Deshecha Landfill (PDLF) Boundary
-  Designated Landfiling Areas (Zones 1 and 4)



0 550 1100
FEET

SOURCE: OCWR (2001, 2005, 2010, 2017, 6/2020); Nearmap (6/2023)

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FIGURE 2

Increase in Maximum Daily Operations at Prima Deshecha Landfill
Surrounding Land Use

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 in **Figure 3**. Zone 1 is the current landfilling area, with an estimated closure date of approximately 2050. Zone 4 is planned to start construction by the end of this year, with a future 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, separating 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. OCWR has placed an existing 487-acre Conservation Easement 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.

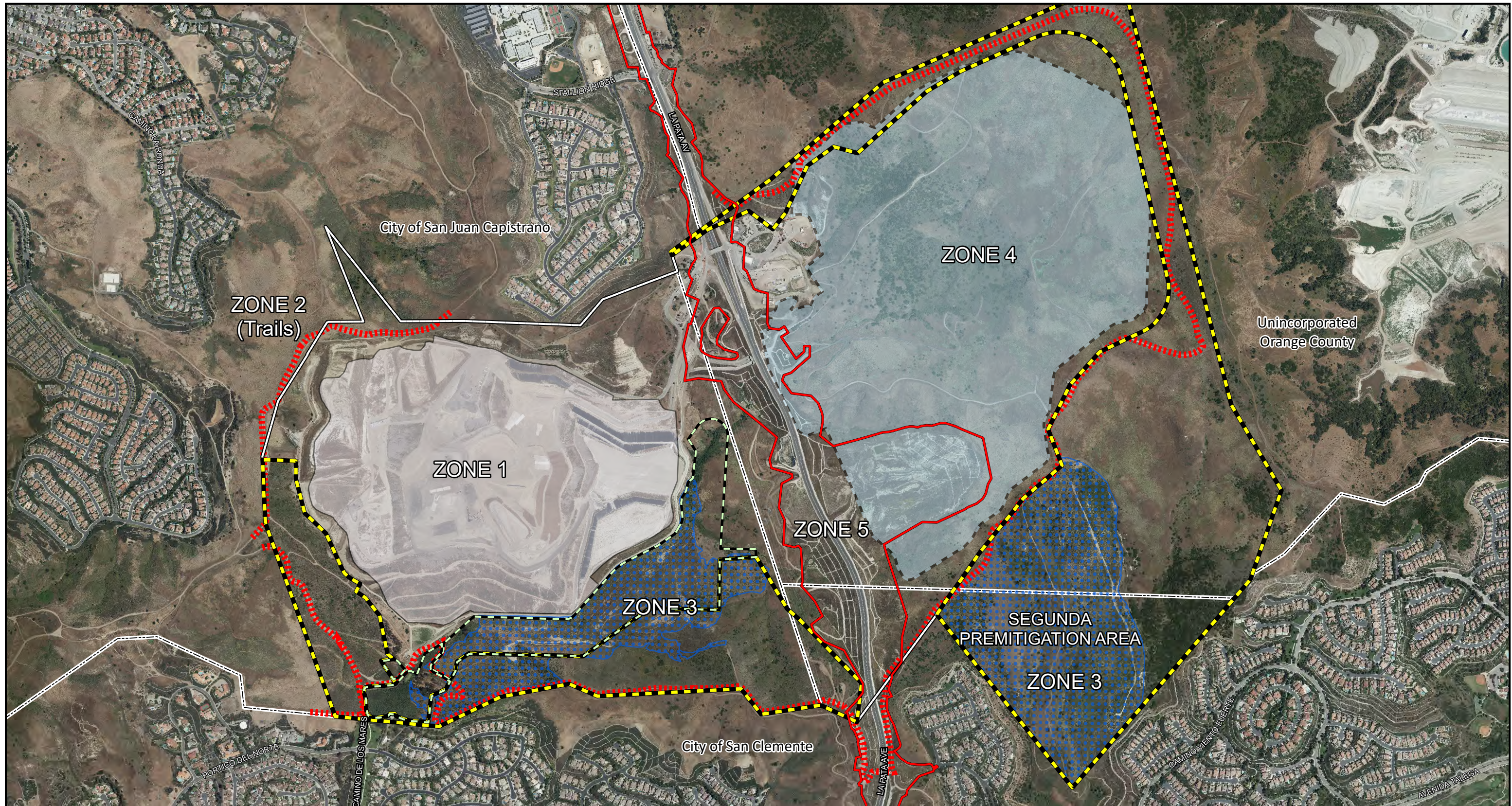
General Plan land use designations directly surrounding the Landfill can be characterized as follows (refer to **Figure 4** for a map showing the General Plan Land Use designations for the Landfill and surrounding areas):

- 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 of the Ranch Plan Planned Community.¹
- To the northwest, the City of San Juan Capistrano includes areas designated Planned Community.
- To the west, the City of San Juan Capistrano includes areas designated Natural 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.

1.10 OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED









Because the Project also involves approvals, permits, or authorization from other agencies, these agencies are "Responsible Agencies" under CEQA. Specifically, 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

¹ OC Public Works (OCPW). 2005. Ranch Plan Planned Community Map. Website: <https://ocds.ocpublicworks.com/sites/ocpwoocds/files/import/data/files/9250.pdf> (accessed August 14, 2023).



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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)

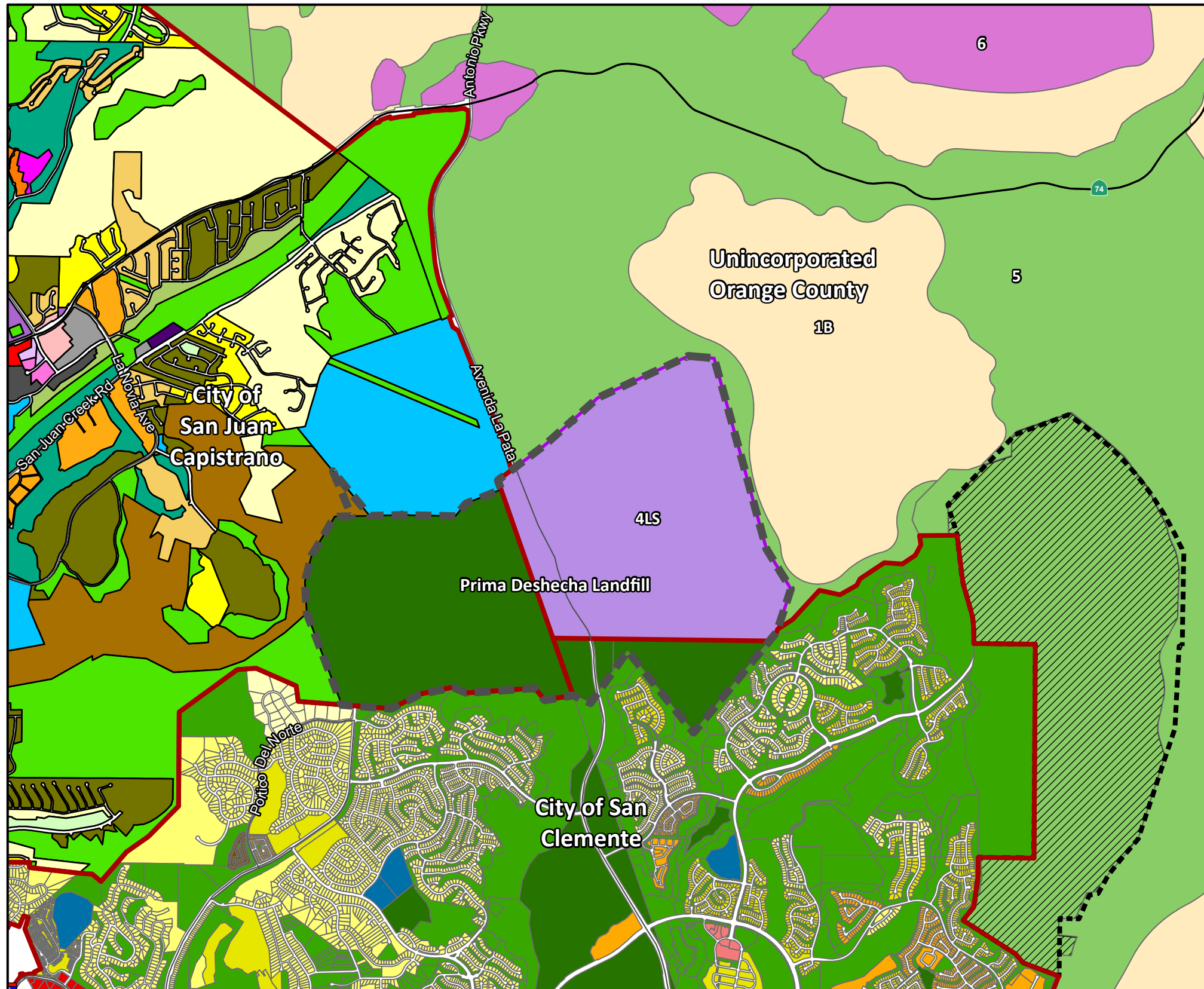


SOURCE: OCWR (2001, 2005, 2010, 2017, 6/2020); Esri (7/2019)

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FIGURE 2.2

Increase in Maximum Daily Operations at Prima Deshecha Landfill
Landfill Zones



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

Orange County
General Plan Land Use

Residential

- 1A Rural Residential
- 1B Suburban Residential

Public Facilities

- 4 Public Facilities
- 4LS Landfill Site

Open Space

- 5 Open Space
- 5S Open Space Reserve

Urban Activity Center

- 6 Urban Activity Center

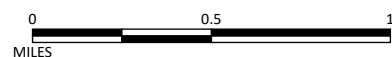
City of San Clemente
General Plan Land Use

- 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
- 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

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LEGEND

- Prima Deshecha Landfill (PDLF) Boundary
- City Boundary
- Sphere of Influence Boundary



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

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FIGURE 4

Increase in Maximum Daily Operations at Prima Deshecha Landfill
General Plan Land Use Designations

mitigation. These agencies include, but are not limited to, the agencies identified in **Table 1**. The facility operates under existing permits and authorizations issued by the RWQCB and SCAQMD. These agencies will be responsible for renewing existing permits and authorizations for ongoing operations and are considered Resource Agencies. The Local Enforcement Agency (LEA) with concurrence by the California Department of Resources Recycling and Recovery (CalRecycle) will have approval authority over the Project and is considered a Responsible Agency.

Table 1: Anticipated Permits and Authorizations

Agency	Permit/Authorization
Local Enforcement Agency (LEA) with concurrence by the California Department of Resources Recycling and Recovery (CalRecycle)	<ul style="list-style-type: none"> ● Solid Waste Facility Permit Revision ● Amendment to the Joint Technical Document (JTD)
Regional Water Quality Control Board (RWQCB)	<ul style="list-style-type: none"> ● 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 ● 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)

1.11 CALIFORNIA NATIVE AMERICAN CONSULTATION

Consultation with Native American tribes pursuant to Public Resources Code (PRC) Section 21080.3.1 is being initiated concurrently with the publication of this Initial Study for review and comment. The following tribes are known to be traditionally and culturally affiliated with the Project area and are being contacted for consultation:

- Gabrieleño Band of Mission Indians – Kizh Nation
- Juaneño Band of Mission Indians
- San Gabriel Band of Mission Indians
- Soboba Band of Luiseño Indians

Consultation will include initial outreach, follow-up, and documentation of concerns related to Project impacts to tribal cultural resources, confidentiality, and related issues.

1.12 PREVIOUS CEQA DOCUMENTATION

The analysis in this Initial Study is based in part on the findings of environmental documents prepared for the 2001 General Development Plan, Prima Deshecha Landfill (GDP), including the following:

- EIR No. 575 (2001 GDP EIR for Landfill Build-Out)
- Supplemental EIR No. 597 (First Supplemental EIR to the 2001 GDP EIR)
- Second Supplemental EIR to the 2001 GDP EIR

- Addenda to EIR No. 575 (2001 GDP EIR)
- Addenda to EIR No. 597 (First Supplemental EIR to the 2001 GDP EIR)

These documents were previously certified by the Orange County Board of Supervisors.

Since the 2001 GDP and its first amendment were approved by the County Board of Supervisors in November 2001, it has been amended three additional times. The First Supplemental EIR to the 2001 GDP EIR evaluated the potential impacts associated with the second amendment to the 2001 GDP. The third amendment was addressed in an Addendum to the 2001 GDP EIR. The fourth amendment was addressed in the Second Supplemental EIR to the 2001 GDP EIR.² These documents are described in more detail below.

1.12.1 2001 GDP EIR for Landfill Build-Out (EIR No. 575)

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

The project analyzed in the 2001 GDP EIR included the following elements:

- The EIR analyzed the GDP for the Prima Deshecha site, which includes a landfill element, a circulation element, and a recreation element. To provide for all three elements, the Prima Deshecha property was divided into five zones. Zones 1 and 4 are reserved for landfill development, Zones 2 and 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; La Pata Avenue was renamed Avenida La Pata.
- For the landfill element of the Prima Deshecha GDP, the EIR 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 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 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.

1.12.2 First Supplemental EIR to the 2001 GDP EIR (Supplemental EIR No. 597)

On June 19, 2007, the County Board of Supervisors approved Final Supplemental EIR No. 597 for the Second Amendment to the Prima Deshecha GDP (SCH #199041035). This was the first Supplemental EIR to EIR 575, referred to herein as the First Supplemental EIR to the 2001 GDP EIR. The project

² While the First Supplemental EIR to the 2001 EIR was referred to as EIR No. 597, the Second Supplemental EIR to the 2001 GDP was not assigned a distinct EIR number.

analyzed in the First Supplemental EIR to the 2001 GDP EIR 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 the 2001 GDP EIR.
- Re-design of future desilting basins for the Zone 4 landfilling area.
- Changing the significance conclusion of the air quality section in the 2001 GDP EIR 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 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.

1.12.3 Second Supplemental EIR to the 2001 GDP EIR

On January 25, 2022, the County Board of Supervisors approved the Second Supplemental EIR to Final EIR No. 575 for the Prima Deshecha GDP (SCH #1999041035), referred to herein as the Second Supplemental EIR to the 2001 GDP EIR. The EIR addressed the following changes to the GDP:

- Revised the phasing of operations between Zone 1 and Zone 4 of the Landfill to allow for concurrent operations and for 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 residences near the Landfill.
- Allowed for 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.
- Allowed for the import of approximately 8,108 cubic yards of soil for liner installation that occurred for all Zone 4 development phases.

These changes were reflected in the Fourth Amendment to the 2001 Prima Deshecha GDP.

1.12.4 EIR Addenda (Addenda to the 2001 GDP EIR and the First Supplemental EIR to the 2001 GDP EIR)

Since the certification of the 2001 GDP, the Orange County Board of Supervisors has approved multiple addenda for various construction projects and changes in operations, some reflected in amendments to the 2001 GDP. The 13 addenda to the 2001 GDP EIR (EIR No. 575) and the 3 addenda that accompany the First Supplemental EIR to the 2001 GDP EIR (Supplemental EIR No. 597) are shown in Table 2, below.

Table 2: EIR Addenda for the Prima Deshecha GDP

Addenda	Date	Project Components
<i>Addenda to the 2001 GDP EIR (EIR No. 575)</i>		
Addendum No. 1 to Final EIR No. 575	October 2003	<ul style="list-style-type: none"> ● A minor (2 percent) increase in the Zone 1 disturbance footprint ● Expansion of the approved coastal sage scrub mitigation planting area
Addendum No. 2 to Final EIR No. 575	March 2005	<ul style="list-style-type: none"> ● An adjustment to project phasing to allow installation of the Phase A2 and B1 liner system ● Zone 1 desilting basin enlargement and upgrade ● Construction of a 60-foot-long rock gabion wall at the terminus of the realigned stream ● Construction of ancillary improvements, including paving of the service road, relocation of the bridge over the desilting basin, and trail accommodations
Addendum No. 3 to Final EIR No. 575	November 2008	<ul style="list-style-type: none"> ● Construction and operation of a materials recovery facility
Addendum No. 4 to Final EIR No. 575	July 2013	<ul style="list-style-type: none"> ● Revised the maximum daily importation tonnage from 700 TPD to 1,840 TPD
Addendum No. 5 to Final EIR No. 575	March 2015	<ul style="list-style-type: none"> ● Allowed construction and operation of a temporary marine vessel storage facility on approximately 7 acres of Waste Management Unit 1
Addendum No. 6 to Final EIR No. 575	September 2018	<ul style="list-style-type: none"> ● 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
Addendum No. 7 to Final EIR No. 575	June 2015	<ul style="list-style-type: none"> ● Allowed acceptance of out-of-County waste through June 30, 2025
Addendum No. 8 to Final EIR No. 575	November 2018	<ul style="list-style-type: none"> ● Approved implementation of an on- and off-site riparian mitigation plan to provide full compensatory mitigation for development of the Zone 4 Landfill area at build out of the Landfill
Addendum No. 9 to Final EIR No. 575	June 2019	<ul style="list-style-type: none"> ● Approved implementation of an on- and off-site riparian mitigation plan to provide full compensatory mitigation for development of the Zone 4 Landfill area at build out of the Landfill
Addendum No. 10 to Final EIR No. 575	May 2020	<ul style="list-style-type: none"> ● Allowed construction and operation of a temporary on-site auto dealership vehicle storage on a previously disturbed 5.28-acre area of the Landfill
Addendum No. 11 to Final EIR No. 575	February 2021	<ul style="list-style-type: none"> ● Allowed reconstruction of the fee booth, scales, and entrance way to the Landfill to facilitate improved traffic flow and management
Addendum No. 12 to Final EIR No. 575	March 2021	<ul style="list-style-type: none"> ● Evaluated a minor change to the anticipated emissions for the Landfill gas collection system
Los Patrones Parkway Extension Project – Addendum to Final EIR No. 575	January 2021	<ul style="list-style-type: none"> ● Amended the 2001 GDP to reflect the Los Patrones Parkway Extension Project (LPPE) roadway traversing portions of Zone 2 and Zone 4 as well as connecting to Avenida La Pata in Zone 5 of the Landfill
<i>Addenda to the First Supplemental EIR to the 2001 GDP EIR (Supplemental EIR No. 597)</i>		
Addendum No. 1 to Final Supplemental EIR No. 597	April 2010	<ul style="list-style-type: none"> ● Allowed blasting and rock crushing/processing operations associated with removal of the San Onofre Breccia Formation in Zone 4 of the Landfill.
Addendum No. 2 to Final Supplemental EIR No. 597	September 2018	<ul style="list-style-type: none"> ● 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.
Addendum No. 3 to Final Supplemental EIR No. 597	March 2021	<ul style="list-style-type: none"> ● Evaluated a minor change to the anticipated emissions for the Landfill gas collection system.

1.13 SUBSEQUENT CEQA DOCUMENTATION REQUIREMENTS

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, one or more of the following:

- (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.

The proposed Project will increase the maximum daily operations at the Landfill, which could affect the significance level of impacts associated with air quality (including dust and odors), greenhouse gases (GHGs), hazards, transportation, and noise. The First Supplemental EIR to the 2001 GDP EIR identified significant and unavoidable impacts associated with air quality and the proposed Project has the potential to exacerbate air quality impacts, as well as GHGs, transportation, and noise. Therefore, a Subsequent EIR will be prepared. All applicable mitigation measures from the 2001 GDP EIR and Addenda, the First Supplemental EIR to the 2001 GDP EIR and Addenda, the Second Supplemental EIR to the 2001 GDP EIR, applicable regulatory permits, and other previous environmental documents certified for the Landfill remain project commitments that apply to the proposed Project.

Since certification of the 2001 GDP EIR in November 2001 and certification of the First Supplemental EIR to the 2001 GDP EIR 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 if the revised Guidelines are in effect when the document is sent out for public review (*State CEQA Guidelines*, Section 15007(c)); as such, to the extent there is a potential for a significant impact to occur, they will be addressed in the Subsequent EIR.³

³ The Second Supplemental EIR to Final EIR No. 575 was not required to address the updated CEQA Guidelines; rather, in accordance with Section 15163 of the *State CEQA Guidelines*, it required only those additions or changes necessary to “make the previous EIR apply to the project in the changed situation.”

2.0 ENVIRONMENTAL DETERMINATION

Based on the analysis in this Initial Study, the County of Orange, OCWR, as the Lead Agency, has made the following determination:

Table 3: Environmental Determination

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	<input type="checkbox"/>
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 or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	<input type="checkbox"/>
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	<input checked="" type="checkbox"/>
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.	<input type="checkbox"/>
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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION , including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	<input type="checkbox"/>
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to the State CEQA Guidelines and the County’s adopted Local CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document.	<input type="checkbox"/>
I find that the proposed project has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and County CEQA Guidelines. Minor additions and/or clarifications are needed to make the previous documentation adequate to cover the project which are documented in this addendum to the earlier CEQA document (CEQA §15164).	<input type="checkbox"/>
I find that the proposed project Has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and County CEQA Guidelines. However, there is important new information and/or substantial changes have occurred requiring the preparation of an additional CEQA document (ND or EIR) pursuant to CEQA Guidelines Sections 15162 through 15163.	<input type="checkbox"/>

Aimee Halligan

Signature

09/12/2023

Date

Aimee Halligan

Printed Name

3.0 PROJECT DESCRIPTION

3.1 INTRODUCTION AND PROJECT OVERVIEW

As stated in Chapter 1, the Landfill is owned by the County and operated by OCWR, a County department that is overseen by the Board of Supervisors. The proposed Project would increase the maximum daily tonnage receipt capacity of the Landfill from 4,000 TPD to 8,000 TPD. This increase in daily tonnage is anticipated to take place gradually, reaching the 8,000 TPD limit by 2030, and would be reflected in proposed Amendment No. 5 to the 2001 Prima Deshecha General Development Plan (GDP).

3.1.1 Project Purpose

OCWR owns and operates three active landfills in Orange County, including the Prima Deshecha Landfill in San Juan Capistrano, the Frank R. Bowerman Landfill in Irvine, and the Olinda Alpha Landfill in Brea. OCWR's Olinda Alpha Landfill, which currently receives approximately 8,000 TPD (up to 10,000 TPD during maximum demand [36 days per year]), has an approved closure date of 2030 but, based on updated engineering estimates, will be closing earlier, potentially as early as the end of 2025 to early 2026, depending on various factors. Based on this pending closure at Olinda Alpha Landfill, and in order to maintain systemwide capacity for Orange County, waste will need to be diverted to OCWR's other active landfills. The proposed Project includes increasing the daily permitted capacity of the Prima Deshecha Landfill to accommodate this necessary diversion of waste once the Olinda Alpha Landfill closes.

3.1.2 Project Objectives

OCWR has established specific solid waste management objectives for the proposed Project, which would aid decision-makers in their review of the proposed Project and its associated environmental impacts. The objectives identified below were utilized in the preparation of this Initial Study for Subsequent EIR to EIR No. 575, particularly with regard to the Landfill's operations:

- Optimize the use of the site as a long-term waste disposal facility.
- Maintain systemwide solid waste disposal capacity to manage solid waste for Orange County by accommodating a portion of the waste stream from the Olinda Alpha Landfill when that facility closes.
- Provide a long-term, regional solid waste management facility with appropriate safeguards, including soil-covered liner installation of each Landfill phase in order to protect public health and safety, as well as water, air, soil, and other important resources that exist on site and on surrounding property.
- Support the goals established under the Regional Landfill Options for Orange County Strategic Plan (RELOOC) to ensure sufficient disposal system capacity for a 40-year period.

3.2 ENVIRONMENTAL SETTING AND SURROUNDING LAND USES, EXISTING PROJECT SITE

3.2.1 Regional Location and Setting

As stated in Section 1.4, the Landfill encompasses 1,530 acres and is located in southeastern Orange County, partially within San Juan Capistrano (570 acres), San Clemente (133 acres), and unincorporated Orange County (827 acres) (see **Figure 1**). The Landfill is located at 32250 Avenida La Pata, and access is provided by I-5, Ortega Highway (SR-74), and Avenida La Pata.

As stated in Section 1.9, geographically, the Landfill is located in 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.

Existing land uses within the Landfill and the surrounding vicinity are shown in **Figure 2**. General Plan land use designations directly surrounding are shown in **Figure 4**.

3.2.2 Current Landfill Operations

Of the total 1,530 acres on the Landfill property, approximately 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, approximately 309 days per year (i.e., it is closed on Sundays and on six major holidays including New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day).

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 accepted a daily average of approximately 3,024 TPD of solid waste in Fiscal Year (FY) 2022/2023 (i.e., July 2022 to June 2023), with the daily average ranging from approximately 2,212 TPD in July 2022 to a maximum of 4,060 TPD in October 2022. Of the average total of 3,024 TPD in FY 2022/2023, an average of approximately 1,854 TPD was received from Orange County cities served by the 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

these cities. An average of approximately 772 TPD of solid waste was delivered to the Landfill by waste haulers hauling imported solid waste from outside Orange County, primarily from Los Angeles County. There are only three waste haulers (i.e., Burrtec, EDCO, and Republic) that are permitted to haul imported solid wastes to Orange County landfills, via importation contracts with the County.

In FY 2022/2023, the Landfill also accepted an average of approximately 399 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. Recyclable materials found in the majority of the solid waste delivered to the Landfill, whether from in-County or out-of-County sources, are first processed and then removed for recycling.

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, odor, 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 over landfills. Permitting and enforcement regulatory agencies for the Landfill's operation include CalRecycle; the California Regional Water Quality Control Board (RWQCB), San Diego Region; the South Coast Air Quality Management District (SCAQMD); and the Local Enforcement Agency (i.e., the Orange County Health Care Agency, Environmental Health Department, acting as the LEA for CalRecycle).

3.3 PROPOSED PROJECT

3.3.1 Project Components

The proposed Project would increase the maximum amount of waste that the Landfill is able to accept on a daily basis from 4,000 TPD to 8,000 TPD. Waste would continue to be disposed of in existing areas of the Landfill that are designated for disposal. The proposed Project would also allow for up to 36 operational emergency days during which the 8,000 TPD limit could be exceeded. Such operational emergency days could occur in the event that another OCWR facility is temporarily closed, which could occur as a result of a freeway closure or other unforeseen events, necessitating diversion of waste to another landfill. **Table 4** shows a comparison of current Landfill operations and projected operations after proposed Project implementation. Although **Table 4** reflects current typical operations to present a basis of comparison to existing conditions, up to 4,000 TPD of waste disposal is permitted under existing conditions. Daily waste tonnage is variable; for example, in June 2023, the daily waste received ranged from a low of 1,435 tons to a high of 3,175 tons.

Table 4: Comparison of Current and Projected Daily Landfill Operations

Operations ¹	Permitted	Current Average ²	Proposed Project Maximum ³
Employees on Site	N/A	45	80
Average Daily Vehicle Trips (PCEs)	N/A	2,555	4,126
Tons per Day	4,000	3,024	8,000 ³

Source: OC Waste & Recycling (2023).

N/A = Not applicable

PCE = Passenger Car Equivalent

¹ Averages calculated based on data from Fiscal Year 2022/2023

² Current conditions based on data from Fiscal Year 2022/2023; the existing permitted capacity is 4,000 tons per day. Daily rates vary substantially.

³ Projected maximum tons per day for the proposed Project; this does not reflect operations on "emergency days."

3.3.2 Construction, Site Improvements, and Infrastructure

The Project does not include any construction components. No improvements are proposed to the site, and no changes to on-site infrastructure are anticipated. No changes are proposed to buildings, parking, lighting, signage, landscaping, or site access. No off-site improvements are proposed.

3.3.3 Project Design Features

All relevant mitigation measures and design features identified in the prior CEQA documentation and the 2001 GDP, as amended, would apply to the Project. If warranted, based on the analysis of Project impacts in the EIR, additional design features will be identified as appropriate.

3.3.4 Project Schedule and Phases

The Project would increase the maximum permitted daily tonnage receipt capacity of the Landfill from 4,000 TPD to 8,000 TPD. The approval for the increased daily tonnage is anticipated to occur in early 2024. However, the increase in daily tonnage is anticipated to take place gradually, approaching the 8,000 TPD limit by 2030. The existing permitted capacity is 4,000 TPD. As noted in **Table 4**, the average TPD during FY 2022/2023 was 3,024. The daily tonnage varies substantially and is based on demand, with some days of the week substantially busier than others. OCWR anticipates it is likely that within the first 5 to 10 years, the TPD would increase to 5,000 to 6,500 TPD and would approach the 8,000 TPD limit closer to 2030. However, it would be speculative to identify a specific rate of increase, due to the uncertainty associated with implementation of State and local regulations related to solid waste reduction and unforeseeable changes in demand (such as might occur due to a change in the frequency of damaging storms, the rate of construction-related waste generation, and changes in the regional waste stream). The closure of other OCWR landfills, including Olinda Alpha, will also be a major factor in increasing demand.

Increasing the daily tonnage permitted at the Landfill may accelerate the completion of landfilling activities in Zone 1 and could accelerate the schedule for developing the Landfill set forth in the 2001 GDP, as amended. However, as noted above, the amount of waste received is based on demand, and there is substantial uncertainty in predicting the rate of increase. Therefore, no changes are proposed to the Landfill development schedule or closure dates at this time.

3.3.5 Changes in Land Use Controls

No changes to land use designations or zoning are anticipated. No land use changes are proposed.

3.4 REQUIRED PERMITS AND APPROVALS

3.4.1 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 Subsequent EIR, Statement of Overriding Considerations, Statement of Findings and Facts, and associated Mitigation, Monitoring, and Reporting Program (MMRP)
- Approval of Amendment No. 5 to the 2001 Prima Deshecha GDP
- Approval of the Increase in Maximum Daily Operations at the Prima Deshecha Landfill

3.4.2 Other Ministerial Actions

Ministerial permits/approvals (e.g., grading permits and building permits) are not anticipated to be required for the increase in maximum daily operations.

3.4.3 Current and Probable Future Actions by Responsible Agencies

As described in Section 1.10, the Project involves approvals, permits, or authorization from other agencies that are “Responsible Agencies” under CEQA. These agencies include, but are not limited to, the agency identified in **Table 1** in Section 1.10. The LEA, which will have discretionary approval authority related to the Project, will be a Responsible Agency. The RWQCB and SCAQMD will be responsible for renewing existing permits and authorizations for ongoing operations and are considered Resource Agencies.

3.5 RELATED PROJECTS

The cumulative impacts analysis in the Subsequent EIR will consider related projects. These will include past, present, and foreseeable future projects with the potential to result in cumulatively considerable impacts in combination with the proposed Project. OCWR will consult with nearby cities and obtain relevant County information regarding anticipated projects, which will be summarized in the Subsequent EIR. Related projects will include other OCWR actions, including anticipated changes and closures at other landfills.

4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

4.1 ANALYSIS METHODOLOGY

Analysis of potentially significant impacts of each of the environmental factors identified in **Table 5**, below, is based on the Project site environmental setting, the Project description, and the sample questions/thresholds of significance. Potentially significant impacts that are reduced below the level of significance by sample questions/thresholds of significance will detail how the potentially significant impact is reduced. Potentially significant impacts that are unable to be reduced below the level of significance will detail the various mitigation options applied and why none would reduce the impact.

The analysis will consider the whole of the actions and include the following:

- On-site impacts
- Off-site impacts
- Short-term construction impacts
- Long-term operational impacts
- Direct impacts
- Indirect impacts
- Cumulative impacts

4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

This document incorporates the Environmental Checklist Form from Appendix G of the *State CEQA Guidelines*.

Table 5, below, lists the environmental factors that are evaluated in this document. Environmental factors that are checked contain at least one impact that has been determined to be a “Potentially Significant Impact.” Environmental factors unchecked indicate that impacts were determined to have resulted in no impacts, less than significant impacts, or less than significant impacts with mitigation measures or County Standard Conditions of Approval incorporated into the Project.

Table 5: Environmental Factors Potentially Affected

<input type="checkbox"/> Aesthetics (Section 4.5)	<input type="checkbox"/> Mineral Resources (Section 4.16)
<input type="checkbox"/> Agriculture and Forestry Resources (Section 4.6)	<input checked="" type="checkbox"/> Noise (Section 4.17)
<input checked="" type="checkbox"/> Air Quality (Section 4.7)	<input type="checkbox"/> Population/Housing (Section 4.18)
<input type="checkbox"/> Biological Resources (Section 4.8)	<input type="checkbox"/> Public Services (Section 4.19)
<input type="checkbox"/> Cultural Resources (Section 4.9)	<input type="checkbox"/> Recreation (Section 4.20)
<input checked="" type="checkbox"/> Energy (Section 4.10)	<input checked="" type="checkbox"/> Transportation (Section 4.21)
<input type="checkbox"/> Geology/Soils (Section 4.11)	<input type="checkbox"/> Tribal Cultural Resources (Section 4.22)
<input checked="" type="checkbox"/> Greenhouse Gas Emissions (Section 4.12)	<input type="checkbox"/> Utilities/Service Systems (Section 4.23)
<input checked="" type="checkbox"/> Hazards & Hazardous Materials (Section 4.13)	<input type="checkbox"/> Wildfire (Section 4.24)
<input type="checkbox"/> Hydrology/Water Quality (Section 4.14)	<input checked="" type="checkbox"/> Mandatory Findings of Significance (Section 4.25)
<input type="checkbox"/> Land Use/Planning (Section 4.15)	

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 account for the *whole of the 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.

As discussed in Section 1.12, a number of previously completed CEQA documents are applicable to the existing Landfill. The 2001 GDP EIR (EIR No. 575), the First Supplemental EIR to the 2001 GDP EIR (Supplemental EIR No. 597), and the Second Supplemental EIR to the 2001 GDP EIR included mitigation that addressed impacts associated with development and operation of the Landfill site. The proposed Project would not affect the Landfill footprint or the authorized activities and is limited to impacts associated with increasing the tons of waste accepted and processed per day. Environmental changes associated with the proposed Project would be an increase in vehicle trips, an increase in the number of employees on the site, and an increase in the amount of equipment in operation at the site to process the higher volume of waste. Waste would continue to be disposed of in areas already intended for Landfill operations. Changes when compared to existing operations would occur related to transportation, air quality, and noise. Relevant mitigation measures from prior CEQA documents are those that apply to vehicle trips, employees, and equipment operations. All mitigation measures and environmental commitments in the 2001 GDP EIR, the First and Second Supplemental EIRs to the 2001 GDP EIR, and all Addenda thereto (collectively referred to as “prior CEQA documentation”) will continue to apply to activities associated with the Landfill, including the proposed changes to operations. Regulatory permits from Resource Agencies, including the RWQCB and SCAQMD, would

remain in effect. The analysis in this section does not include a comprehensive list of all mitigation measures in all topics, as most are not relevant to the scope of the proposed Project.

4.3 THRESHOLDS OF SIGNIFICANCE

Thresholds of significance are identifiable quantitative, qualitative, or performance-level standards of a particular environmental effect, noncompliance with which means the effect will normally be determined to be significant by a Lead Agency and compliance with which means the effect will normally be determined to be less than significant (*State CEQA Guidelines* Section 15064.7(a)).

The County has not adopted specific thresholds of significance and, instead, relies upon the specific questions relating to the topical environmental factors listed in Appendix G of the *State CEQA Guidelines* to assist in the determination of a potentially significant impact. The County may, depending on the circumstances of a particular project, use specific thresholds of significance on a case-by-case basis as provided by *State CEQA Guidelines* Section 15064.7(b).

4.4 ENVIRONMENTAL BASELINE

To adequately determine the significance of a potential environmental impact, the environmental baseline must be established. *State CEQA Guidelines* Section 15125(a) states in pertinent part that the existing environmental setting will normally constitute the baseline physical conditions that will assist the County in a determining if an impact is significant.

Therefore, the environmental baseline for this Project constitutes the existing physical conditions as they exist at the time the environmental process commenced.

4.5 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The 2001 GDP EIR found that the construction and operation of the Landfill through completion of the GDP for the Landfill would result in an unavoidable significant adverse impact to aesthetics even after the implementation of mitigation measures. However, the 2001 GDP EIR did not specify whether the Landfill’s 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 would allow the Landfill to accept more waste on a daily basis but not increase the maximum permitted elevation that was assessed in previous CEQA documents. Waste would continue to be disposed of in existing areas of the Landfill that are designated for disposal in accordance with the parameters set forth in the 2001 GDP, as amended. The proposed Project would not alter the existing topography of the area or impact public vantage points and scenic vistas beyond what has been previously analyzed for Landfill operations. As a result, the proposed Project would not have a substantial adverse effect on a scenic vista. **Therefore, this topic will not be analyzed in the Subsequent EIR unless new information identifying it as a potentially significant impact not analyzed in prior CEQA documentation⁴ is presented during the scoping process.**

⁴ Prior CEQA documentation includes those documents described in Section 1.12, including EIR No. 575 (the 2001 GDP EIR), Supplemental EIR No. 597 (the First Second Supplemental EIR to the 2001 GDP EIR), the Second Supplemental EIR to the 2001 GDP EIR, and all Addenda thereto.

- 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. The 2001 GDP EIR 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, the Landfill is located near eligible State Scenic Highways, including I-5 and SR-74 (Caltrans 2023). However, the Landfill is not visible from either highway due to the site's distance from the highways and the topography of the intervening land. The Transportation Element of the County General Plan shows that the Landfill is not near a landscape or viewscape corridor. The Landfill is located along Avenida La Pata, which is not an eligible or designated County or State Scenic Highway. The proposed Project would not alter the existing topography of the area or impact scenic resources beyond what has been previously analyzed for Landfill operations. The Project would not damage scenic resources, including those within a State Scenic Highway; therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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?*

No Impact. The 2001 GDP EIR 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 Landfill 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 that 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 and scrub. The Landfill is visible from various areas within the cities of San Clemente and San Juan Capistrano. The proposed Project would not expand the Landfill's footprint horizontally or vertically. The increase in daily operations may require the use of more equipment and increased truck trips at the Landfill. However, this would not substantially degrade the visual character or quality of public views of the site and its surroundings. The proposed Project would not increase the severity of impacts above those previously identified in the 2001 GDP EIR; therefore, no new or additional mitigation is required. **This topic will not be analyzed in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

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

No Impact. The 2001 GDP EIR 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. The proposed Project would not change the hours of operation; the Landfill would continue to operate only during daylight hours. The proposed Project's impacts to light and glare would not change the light and glare impacts identified in the 2001 GDP EIR; therefore, no new or additional mitigation is required. **This topic will not be analyzed in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.6 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and to forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board.

	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. The 2001 GDP EIR found that the construction and operation of the Landfill through completion of the GDP would not result in any impacts to farmland. The First Supplemental EIR to the 2001 GDP EIR concluded that the previously approved project would have no effect on agricultural uses other than potentially removing the possibility of grazing as an acceptable land use in Zone 4 over the post-closure time period. No mitigation measures related to agriculture were identified in the 2001 GDP EIR or the First Supplemental EIR to the 2001 GDP EIR. The Landfill is designated as urban and built-up, grazing, and other land and is not designated Prime Farmland, Unique Farmland,

or Farmland of Statewide Importance.⁵ 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 Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

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

No Impact. The 2001 GDP EIR found that the construction and operation of the Landfill through completion of the GDP would not result in any impacts to farmland. The Landfill is not zoned or currently used for agricultural purposes, and no Williamson Act contracts are in effect. 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 Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR found that the construction and operation of the Landfill through completion of the GDP would not result in any impacts to forest land. The Landfill 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 Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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 Landfill. 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 Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

⁵ California Department of Conservation. California Important Farmland Finder. Website: <https://maps.conservation.ca.gov/dlrp/ciff/> (accessed July 25, 2023).

- 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. The 2001 GDP EIR 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 Landfill 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 Landfill. 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 Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.7 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. The 2001 GDP EIR 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. Applicable mitigation measures included dust suppression and reducing dust generation during operations, including those associated with landfilling and transportation on unpaved roads. 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 non-attainment 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 First Supplemental EIR to the 2001 GDP EIR, which evaluated the Second Amendment to the 2001 GDP, revised the conclusions with respect to air quality; although the emissions associated with the Second Amendment to the 2001 GDP were not different than the emissions generated by the 2001 GDP. The First Supplemental EIR to the 2001 GDP EIR updated the impact conclusion for air quality effects to reflect a conclusion of “significant after mitigation” based on changes to the *State CEQA Guidelines*.

Although the proposed Project would be consistent with the applicable General Plans, the proposed Project would result in long-term emissions as a result of additional operational vehicle trips and an increase in the amount of equipment in daily use on the site associated with the proposed increase in

daily operations. Furthermore, the applicable AQMP was revised in 2022. 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 the 2001 GDP EIR and subsequent CEQA documentation or conflict with the AQMP as revised in 2022. **This topic will be analyzed in the Subsequent EIR, and mitigation, if needed, will be developed and included in the Subsequent EIR to address potentially significant adverse Project effects related to consistency with the AQMP beyond those previously analyzed in prior CEQA documentation.**

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. The 2001 GDP EIR 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 AAQS after the implementation of mitigation measures. The First Supplemental EIR to the 2001 GDP EIR revised the conclusions with respect to air quality; although the emissions associated with the Second Amendment to the 2001 GDP were not different than the emissions generated by the 2001 GDP. The First Supplemental EIR to the 2001 GDP EIR updated the impact conclusion for air quality effects to reflect a conclusion of “significant after mitigation” based on changes to the *State CEQA Guidelines*. Refer to Response 4.7.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 additional long-term operational emissions as a result of the additional operational vehicle trips associated and an increase in the amount of equipment in daily use on the site with the proposed increase in daily operations. As part of the proposed Project, analysis will be conducted to assess potentially significant adverse impacts for short-term (construction) and long-term (operations), Project-related air quality effects. The findings of the air quality analysis and recommended mitigation (if necessary) will be described in the Subsequent EIR. **This topic will be analyzed in the Subsequent EIR, and mitigation will be included in the Subsequent 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 prior CEQA documentation.**

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

Potentially Significant Impact. The 2001 GDP EIR 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. The First Supplemental EIR to the 2001 GDP EIR revised the conclusions with respect to air quality; although the emissions associated with the Second Amendment to the 2001 GDP were not different than the emissions generated by the 2001 GDP, the First Supplemental EIR to the 2001 GDP EIR updated the impact conclusion for air quality effects to reflect a conclusion of “significant after mitigation” based on changes to the *State CEQA Guidelines*. Refer to Response 4.7.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 closest off-

site sensitive receptors to the Project site include residences located approximately 900 feet (274 meters) south of Zone 4. The proposed Project would result in additional long-term operational emissions due to the additional vehicle trips and increase in the amount of equipment in daily use on the site associated with the increase in daily operations, which could expose these sensitive receptors to substantial pollutant concentrations. Evaluation of Project-related operational emissions will be conducted to assess whether the proposed Project would expose sensitive receptors to substantial pollutant concentration above those previously analyzed in the 2001 GDP EIR or cause an increase in severity of a previously identified impact on air quality. **This topic will be analyzed in the Subsequent EIR, and mitigation will be developed and included in the Subsequent EIR, if necessary, to address potentially significant adverse Project effects related to substantial pollutant concentrations beyond those previously analyzed in prior CEQA documentation.**

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

Potentially Significant Impact. The 2001 GDP EIR 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. Measures included rejection of extremely odorous loads for disposal, periodic odor surveys, and daily covering of the active face of the landfill. 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. The proposed Project would generate the same odors that current Landfill operations generate, however, odors have the potential to increase with implementation of the proposed Project because the Landfill would be able to accept more waste on a daily basis. Therefore, the Project may result in impacts related to odors on nearby sensitive receptors (e.g., residential uses) above those previously analyzed in the 2001 GDP EIR. **This topic will be analyzed in the Subsequent EIR, and mitigation will be developed and included in the Subsequent EIR, if necessary, to address potentially significant adverse Project effects related to odors beyond those previously analyzed in prior CEQA documentation.**

4.8 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 Impact. The 2001 GDP EIR 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 were analyzed in the previous environmental reviews conducted for the Landfill in the 2001 GDP EIR. Since the certification of the 2001 GDP EIR, OCWR has either fully implemented or will soon implement all of the mitigation measures for biological resources included in the 2001 GDP EIR.

A primary purpose of the previously approved project analyzed in the First Supplemental EIR to the 2001 GDP EIR was to better define the limits of disturbance associated with the ultimate build out of the Landfill and provide a more conservative estimate of the actual effects of landslide remediation and stabilization and ongoing operation and management of the Landfill. The First Supplemental EIR

to the 2001 GDP EIR incorporated changes and additional mitigation to avoid or substantially lessen the significant environmental effects on biological resources. Implementation of mitigation measures contained within the 2001 GDP EIR along with the mitigation measures and project features identified in the First Supplemental EIR to the 2001 GDP EIR were determined to reduce potential significant adverse impacts of the proposed Project related to biological resources to a less than significant level. There were no significant unavoidable adverse project impacts related to biological resources after implementation of these mitigation measures.

In addition, Addendum No. 8 to the 2001 GDP EIR approved implementation of an on- and off-site riparian mitigation plan to provide full compensatory mitigation for development of the Zone 4 Landfill area at build out of the Landfill. The changes included requirements for the establishment of off-site wetland and riparian habitat. Addendum No. 9 to the 2001 GDP EIR also provided compensatory mitigation for the loss of State jurisdictional waters associated with the long-term development of Zone 4. The changes analyzed in Addendum 9 included a requirement for the development of a Habitat Mitigation and Monitoring Plan (HMMP) for the On-site Nonwetland/Riparian Creation Project to address direct impacts from landfilling activities including the breccia removal and development of Zone 4 as well as indirect impacts from construction activities.

Landfill operations were identified as having 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 California Department of Fish and Wildlife (CDFW) or the United States Fish and Wildlife Service (USFWS). However, these impacts were analyzed in the 2001 GDP EIR. The proposed Project does not include any changes to the types or locations of approved activities associated with Landfill operations and therefore would not result in any new significant impacts or more severe impacts to biological resources beyond those previously identified in the 2001 GDP EIR. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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 Impact. The 2001 GDP EIR 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. Landfill construction and operation were identified as having 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 analyzed in the 2001 GDP EIR. The proposed Project does not include any changes to the types or locations of approved activities associated with Landfill operations and therefore would not result in any new significant impacts or more severe impacts to biological resources beyond those previously identified in the 2001 GDP EIR. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new**

information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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 Impact. The 2001 GDP EIR 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 4.8.b, above. Impacts to State or federally protected wetlands from Landfill operations, including the expansion of Zone 4, were accounted for in the 2001 GDP EIR, and a Section 404 Individual Permit was obtained from the United States Army Corps of Engineers (USACE) in January 2021. The Section 404 Individual Permit also required OCWR to obtain a Section 401 Water Quality Certification from the RWQCB, which was obtained in March 2020. A Section 1600 Streambed Alteration Agreement was also obtained from the CDFW in November 2020. In addition, an 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.

Landfill operations were identified in prior CEQA documents as having potentially significant impacts on federally protected wetlands and waters of the United States as defined by Section 404 of the Clean Water Act. These impacts were analyzed in the 2001 GDP EIR. The proposed Project does not include any changes to the types or locations of approved activities associated with Landfill operations and therefore would not result in any new significant impacts or more severe impacts to biological resources beyond those previously identified in prior CEQA documentation. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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 Impact. The 2001 GDP EIR 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 4.8.a, above. As noted in the 2001 GDP EIR, the continued landfilling activities act as a deterrent to wildlife movement, especially northeast-to-southwest movement of wildlife through the Landfill via the main Prima Deshecha Cañada drainage. Increasing the maximum daily operations, as would occur with the proposed Project, would not increase impacts to regional and local wildlife movement above existing conditions; therefore, 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. 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. The proposed Project does not include any changes to the types or locations of approved activities associated with Landfill operations and therefore would not result in any new significant impacts or more severe impacts to biological resources beyond those previously identified in the 2001 GDP EIR. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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, as amended, is the governing land use plan for the site. As part of the proposed Project, waste would continue to be disposed of in areas already intended for Landfill operations. As previously concluded in the 2001 GDP EIR, implementation of the proposed Project would not conflict with any local ordinances protecting biological resources. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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 Impact. The 2001 GDP EIR 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 (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or State habitat conservation plan. However, in 2007, the Landfill was included in the Orange County SSHCP. As a result, OCWR has installed 122 acres of coastal sage scrub and 19 acres of native grassland as pre-mitigation for future biological impacts from the Zone 4 landfill development area within a permanently protected 530-acre area of the Landfill property designated as Supplemental Open Space by the SSHCP. This provided full compensatory mitigation for all of the upland biological impacts identified in the 2001 GDP EIR that would occur with the full development of the Landfill. Operation and expansion of the 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. The proposed Project does not include any changes to the types or locations of approved activities associated with Landfill operations and therefore would not result in any new significant impacts or more severe impacts to biological resources beyond those previously identified in the 2001 GDP EIR. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.9 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 type="checkbox"/>	<input checked="" 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. The 2001 GDP EIR 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, and that, as such, no mitigation would be required. The First Supplemental EIR to the 2001 GDP EIR concluded that due to the static nature of cultural resources in the landscape, the archaeological conditions of the proposed Project would be consistent with those identified in the 2001 GDP EIR and no additional mitigation measures were required. 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 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 the 2001 GDP EIR, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas analyzed in the 2001 GDP EIR. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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 Impact. The 2001 GDP EIR 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 archaeological resources and possibly additional resources that may exist in both Zones 1 and 4 but that were not identified at the time the 2001 GDP EIR 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 archaeological 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. 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 the 2001 GDP EIR, which concluded the GDP would result in significant impacts to archaeological resources and that mitigation was required.

The proposed Project would not result in any new significant impacts or more severe impacts to archaeological resources beyond those previously analyzed in the 2001 GDP EIR and subsequent investigations, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas analyzed in the 2001 GDP EIR. Furthermore, since the Landfill's refuse limits and property boundary will not be expanded, no additional ground disturbance is required as a result of increasing maximum daily operations. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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 potential to disturb any human remains, including those interred outside of dedicated cemeteries. No known human remains are interred on the Landfill property. The 2001 GDP EIR indicated that 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 PRC Section 5097.98. The proposed Project would not result in any new significant impacts or more severe impacts to archaeological resources (including prehistoric human remains) beyond those previously analyzed in the 2001 GDP EIR since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas previously analyzed in the 2001 GDP EIR. Furthermore, since the landfill refuse limits and property boundary will not be expanded, no additional ground disturbance is required as a result of increasing maximum daily operations. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.10 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

Potentially Significant Impact. Since certification of the 2001 GDP EIR in November 2001 and certification of the First Supplemental EIR to the 2001 GDP EIR in June 2007, there have been several revisions to CEQA and the *State CEQA Guidelines*. In December 2018, CEQA and the *State CEQA Guidelines* were updated to include several new topics, one of which was Energy. 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*, Section 15007(c)). Therefore, the previous CEQA documentation did not address topics added in the 2018 CEQA update or any update that occurred between 2001 and the present day.

The proposed Project does not include any changes to the types or locations of approved activities currently in place within the Landfill development areas. As discussed in Section 4.17, Noise, the proposed increase in maximum daily operations as part of the proposed Project would increase the amount of on-site equipment in daily use associated with processing waste. Although impacts due to the wasteful, inefficient, or unnecessary consumption of energy resources during project operation are not anticipated to be significant, this topic was not evaluated in previous CEQA documents and therefore, **this topic will be analyzed in the Subsequent EIR and mitigation, if needed, will be developed and included in the Subsequent EIR to address potentially significant adverse Project effects.**

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. As discussed in Response 4.10.a, the 2001 GDP EIR did not address impacts related to Energy. The proposed Project does not include any changes to the types or locations of approved activities currently in place within the Landfill development areas. The proposed increase in maximum daily operations as part of the proposed Project would increase the amount of on-site equipment in daily use associated with processing waste. Although the proposed Project is not anticipated to conflict with a State or local plan for renewable energy or energy efficiency, this topic was not evaluated in previous CEQA documents and therefore, **this topic will be analyzed in the Subsequent EIR and mitigation, if needed, will be developed and included in the Subsequent EIR to address potentially significant adverse Project effects.**

4.11 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 Impact. The 2001 GDP EIR found that the construction and operation of the Landfill would result in a less than significant impact to geology and soils after the implementation of mitigation measures. The First Supplemental EIR to the 2001 GDP EIR further evaluated the extent of areas needed to accommodate landslide remediation. The Landfill is in southern California, which is a seismically active region. The Landfill is not within a mapped Alquist-Priolo Earthquake Fault Zone. However, the Landfill 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 Zone 4, and several other unnamed faults that also cross Zone 4. No significant faulting has been mapped in the Zone 1 area of the Landfill. The 2001 GDP EIR 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 the 2001 GDP EIR and the First Supplemental EIR to the 2001 GDP EIR. The proposed Project would not result in any new significant impacts or more severe impacts to geology and soils beyond those previously analyzed in the 2001 GDP EIR since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas previously analyzed in the 2001 GDP EIR. Furthermore, since the Landfill's refuse limits and property boundary will not be expanded, no additional ground disturbance is required as a result of increasing maximum daily operations. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

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

Less Than Significant Impact. The 2001 GDP EIR 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 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 Landfill associated with ongoing operations would be stabilized through revegetation or other means. The proposed Project would not result in any new significant impacts or more severe impacts to geology and soils beyond those previously analyzed in the 2001 GDP EIR since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas previously analyzed in the 2001 GDP EIR. The increase in daily operations would result in a larger volume of waste being processed daily; however, with implementation of existing measures in accordance with applicable permits (including Waste Discharge Requirements from the RWQCB) this would not affect soil erosion or potential loss of topsoil. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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 Impact. The 2001 GDP EIR 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 4.11.a, above. The 2001 GDP EIR 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 the 2001 GDP EIR. The proposed Project would not result in any new significant impacts or more severe impacts to geology and soils beyond those previously analyzed in the 2001 GDP EIR since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. Furthermore, since the Landfill's refuse limits and property boundary will not be expanded, no

additional ground disturbance is required as a result of increasing maximum daily operations. The increase in daily operations would result in a larger volume of waste being processed daily; however, this would not affect landslide potential. No new or additional mitigation is required; the increase in waste would not affect the implementation of landslide remediation projects identified in the prior CEQA documentation. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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?

No Impact. The 2001 GDP EIR found that the construction and operation of the GDP would result in a less than significant impact as a result of expansive soils. The 2001 GDP EIR found that the Landfill site contains a minimal amount of expansive soils, which was not anticipated to result in any significant impacts to the Landfill development. The proposed Project would not require additional ground disturbance or otherwise have the potential to be affected by expansive soil; therefore, no impact would occur. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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 construction of additional 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. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

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

Less than Significant Impact. The 2001 GDP EIR 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 the 2001 GDP EIR, the San Onofre Breccia is sensitive for paleontological resources. The 2001 GDP EIR determined that any grading, earthmoving, or excavation activities for the construction of the circulation improvements under the 2001 GDP could impact paleontological resources. These impacts were found to be significant and mitigation was required. The First Supplemental EIR to the 2001 GDP EIR concluded that due to the static nature of paleontological resources in the landscape, the paleontological conditions of the Landfill site would be consistent with those identified in the 2001 GDP EIR and no additional mitigation measures were required. The proposed Project does not require additional ground disturbance; therefore, there

would be no new or more severe impacts to paleontological resources beyond those analyzed in the 2001 GDP EIR. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.12 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Potentially Significant Impact. Since certification of the 2001 GDP EIR in November 2001 and certification of First Supplemental EIR to the 2001 GDP EIR in June 2007, there have been several revisions to CEQA and the *State CEQA Guidelines*. In December 2018, CEQA and the *State CEQA Guidelines* were updated to include several new topics, one of which was GHG Emissions. 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*, Section 15007(c)). Therefore, the previous CEQA documentation did not address topics added in the 2018 CEQA update or any update that occurred between 2001 and the present day.

The proposed Project does not include any changes to the types or locations of approved activities currently in place within the Landfill development areas. As discussed in Section 4.7, Air Quality, the proposed increase in maximum daily operations as part of the proposed Project would result in long-term operational emissions as a result of additional vehicle trips and an increase in the amount of equipment in daily use on the site. Although impacts due to the direct or indirect generation of GHG emissions are not anticipated to be significant, this topic was not evaluated in previous CEQA documents; therefore, **this topic will be analyzed in the Subsequent EIR and mitigation, if needed, will be developed and included in the Subsequent EIR to address potentially significant adverse Project effects.**

b. *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Potentially Significant Impact. As discussed in Response 4.12.a, the 2001 GDP EIR did not address impacts related to GHG emissions. The proposed Project does not include any changes to the types or locations of approved activities currently in place within the Landfill development areas. As discussed in Section 4.7, Air Quality, the proposed increase in maximum daily operations as part of the proposed Project would result in long-term emissions as a result of additional operational vehicle trips and the increase in the amount of equipment in daily use on the site. Although the proposed Project is not anticipated to conflict with a State or local plan for reducing emissions of GHGs, this topic was not evaluated in previous CEQA documents and therefore **this topic will be analyzed in the**

Subsequent EIR and mitigation, if needed, will be developed and included in the Subsequent EIR to address potentially significant adverse Project effects.

4.13 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 type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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 Impact. The 2001 GDP EIR found that the construction and operation of the GDP would result in a less than significant impact with regard to a 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 the 2001 GDP EIR, the project site is a solid waste landfill that has 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 of in the Landfill is limited by the following factors associated with operating procedures related to the waste stream: (1) the majority of solid waste materials received at the Landfill are 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. Mitigation measures in the 2001 GDP EIR required implementing the policy to not accept

hazardous materials at the Landfill, implementing operating procedures for acceptance and disposal of nonhazardous automobile shredder waste, and implementing procedures for safe handling and removal of waste oil and other 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. While the proposed Project would increase the volume of waste accepted and processed daily, with implementation of the measures and operating procedures identified in the 2001 GDP EIR, this would not result in any new significant impacts or more severe impacts to hazards and hazardous materials beyond those previously analyzed in the 2001 GDP EIR. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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?

Potentially Significant Impact. The 2001 GDP EIR 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 the 2001 GDP EIR, the Landfill is a solid waste landfill with the potential to accept household hazardous waste materials that are mixed in with regular commercial and residential solid waste. As stated in response to Threshold 4.13.a, existing procedures associated with the waste stream limit the potential for undetected hazardous waste materials to be present at the Landfill. Identified 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. The proposed Project would increase the volume of waste accepted and processed daily, increasing potential for falling debris from vehicles transporting waste to the Landfill. The measures and associated operating procedures identified in the 2001 GDP EIR would apply to the proposed Project; however, there may be a potential need to identify additional measures to reduce the hazards associated with an increase in falling debris from trash trucks beyond what was considered in the prior CEQA documentation. **This topic will be analyzed in the Subsequent EIR and mitigation, if needed, will be developed and included in the Subsequent EIR to address potentially significant adverse Project effects.**

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. The 2001 GDP EIR found that the construction and operation of the GDP would not emit hazardous emissions or involve handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school and, therefore, would have no impacts. Since the certification of the 2001 GDP EIR, San Juan Hills High School has been built and is operational north of the Landfill site; however, San Juan Hills High School is located more than 0.25 mile north of the Landfill site. There are currently no schools within 0.25 mile of the Landfill. Therefore, 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. **This topic will not be analyzed**

further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR found that the Landfill site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Additionally, the Landfill is not on the most current list of hazardous materials sites.⁶ Therefore, operation of the proposed Project would not pose a potential environmental concern to the surrounding area or result in any environmental violations associated with activities conducted at the Landfill. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR found that the Landfill site is not within an airport land use plan or within 2 miles of a public airport or public use airport. No new airports have been constructed within 2 miles of the Landfill since the certification of the 2001 GDP EIR. Therefore, the proposed Project would not result in a safety hazard or excessive noise to people residing or working in the Landfill, and no mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

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

Less than Significant Impact. The 2001 GDP EIR found that the construction and operation of the GDP would not introduce new barriers or constraints on emergency response or evacuation. The 2001 GDP EIR included a mitigation measure requiring the use of flags and other measures to halt through traffic when construction and landfill equipment is crossing Avenida La Pata at intersections with temporary access roads, as well as limiting the delay on Avenida La Pata to not more than the crossing of five vehicles at one time. The proposed Project would not require or result in any long-term or permanent lane closures on roadways adjacent to the site. The evacuation maps for San Juan Capistrano indicate that Avenida La Pata, which crosses the middle of the Landfill, is an evacuation route.⁷ The County of Orange General Plan Transportation Element classifies Avenida La Pata as a primary arterial highway,

⁶ California Environmental Protection Agency (CalEPA). 2020. Cortese List: Section 65962.5(c). Website: <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/> (accessed July 25, 2023).

⁷ City of San Juan Capistrano. 2021. Emergency Evacuation Maps. Website: <https://www.sanjuancapistrano.org/DocumentCenter/View/667/San-Juan-Capistrano-Emergency-Evacuation-Maps-PDF> (accessed August 15, 2023).

which is defined as a four-lane divided roadway that is designed to accommodate approximately 20,000 to 30,000 vehicle trips per day at level of service (LOS) “C.” The increase in maximum daily operations associated with the proposed Project (see **Table 4**) would add a nominal volume of traffic (an estimated 1,571 daily vehicle trips⁸), which would not impair the use of Avenida La Pata as an evacuation route. The roadway currently operates at an acceptable LOS. Therefore, the proposed Project would not substantially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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 Impact. The 2001 GDP EIR found that the construction and operation of the GDP would result in a less than significant impact related to fire. Specifically, the 2001 GDP EIR evaluated Fire Safety and Control as a topic under Public Safety and Risk of Upset (Section 4.13 of that document). Although impacts were determined to be less than significant, the document included mitigation measures to further reduce the risk of fires. These measures addressed reducing the risks of potential surface fires at the Landfill, responding to surface fires, and existing fire hazards. The First and Second Supplemental EIRs to the 2001 GDP EIR carried these measures forward, although no further analysis specific to this topic was included in the Supplemental EIRs.

According to the California Department of Forestry and Fire Protection (CAL FIRE) 2023 Orange County State Responsibility Area Fire Hazard Severity Zones Map, the eastern half of the Landfill (east of Avenida La Pata) is located in a Very High Fire Hazard Severity Zone (VHFHSZ) while the western half is located in Local Responsibility Area (LRA).⁹ This is consistent with the County’s General Plan Safety Element Fire Hazard Severity Zones Map. According to CAL FIRE’s California Fire Hazard Severity Zone Viewer (2020), the Household Hazardous Waste Collection Centers and parking facilities at the Landfill are within a designated State Responsibility Area (SRA) moderate Fire Hazard Severity Zone (FHSZ).¹⁰ Potential impacts from wildland fires were analyzed in the 2001 GDP EIR and subsequent CEQA documents. The proposed Project would not result in any new significant impacts or more severe impacts from wildland fires beyond those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

⁸ Daily vehicle trips are in Passenger Car Equivalents.

⁹ California Department of Forestry and Fire Protection (CAL FIRE). 2023. Fire Resources Assessment Program. State Responsibility Area Fire Hazard Severity Zone Orange County. Website: https://osfm.fire.ca.gov/media/ovnbsxhd/fhsz_county_sra_11x17_2022_orange_2.pdf (accessed July 25, 2023).

¹⁰ California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Resources Assessment Program. California Fire Hazard Severity Zone Viewer. Website: <https://egis.fire.ca.gov/FHSZ/> (accessed July 25, 2023).

4.14 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 Impact. The 2001 GDP EIR 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. The First Supplemental EIR to the 2001 GDP EIR concluded that the previously approved project for the landslide remediation was intended to reduce impacts associated with the 2001 Prima Deshecha GDP by providing features that mimic natural hydrologic conditions at the site, thereby providing a hydrologic benefit. In addition to ongoing compliance with National Pollutant Discharge Elimination System (NPDES) requirements for industrial discharges, the First Supplemental EIR to the 2001 GDP EIR required compliance with Section 7 of Orange County’s Drainage Area Management Plan (DAMP), which requires a Water Quality Management Plan. Although not needed to reduce impacts to a less than significant level, compliance with the DAMP was a project mitigation requirement. Operation of the Landfill has the potential to introduce pollutants into receiving waters. The proposed Project would comply with the applicable NPDES permits and implement operational Best Management Practices (BMPs) to minimize pollutants of concern in stormwater runoff. The Landfill’s 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.¹¹ The proposed increase in the maximum daily operations would be adequately supported by the existing stormwater system. The proposed Project would not result in any new significant impacts or more severe impacts to hydrology and water quality beyond those previously analyzed since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. Therefore, no new or additional mitigation is required. The existing Landfill operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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 Landfill, the Landfill is not located above a designated groundwater basin.¹² Because the Landfill 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. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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. The proposed Project would not expand the Landfill's footprint vertically or horizontally and would not involve ground-disturbing activities or increase impervious surface area, which would increase the potential for on- and off-site erosion and siltation. The proposed Project would comply with the applicable NPDES permits and OCWR would continue to implement BMPs to reduce impacts

¹¹ Final EIR No. 575 evaluated potential impacts associated with vectors (e.g., mosquitoes, flies, and rodents) as a separate topic, Transport of Disease Vectors, and identified several mitigation measures to address these, concluding that impacts would be less than significant. Final Supplemental EIR No. 597 further evaluated the effects of the desilting basins with respect to water-related vector issues (e.g., mosquitoes), also concluding the impacts would not be significant with the implementation of mitigation identified in Final EIR No. 575.

¹² California Department of Water Resources. Groundwater Basin Boundary Assessment Tool. Website: <https://gis.water.ca.gov/app/bbat/> (accessed July 25, 2023).

to water quality, including those from erosion and siltation, as under existing conditions. The Landfill's 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. The proposed increase in the maximum daily operations would be adequately supported by the existing stormwater system. 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 those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. Therefore, no new or additional mitigation is required. The existing Landfill operation operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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 Impact. The 2001 GDP EIR 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. The proposed Project would not expand the Landfill's footprint vertically or horizontally and would not increase stormwater runoff or the potential for on- and off-site flooding to occur. 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 those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. Therefore, no new or additional mitigation is required. The existing Landfill operation operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. The Landfill's 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. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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 Impact. The 2001 GDP EIR 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. The existing Landfill operation operates in compliance with Waste Discharge

Requirements issued by the California RWQCB, San Diego Region. The Landfill's 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. The proposed Project would not expand the Landfill's footprint vertically or horizontally and would not increase stormwater flow and discharge of pollutants. The proposed Project would not result in any new significant impacts or more severe impacts to hydrology and water quality beyond those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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,¹³ Zone A of the 100-year floodplain associated with Prima Deshecha Cañada traverses the Landfill from the northeast to the southwest. The remainder of the Landfill is within Zone X, areas of minimal flood hazard. However, the proposed Project would not expand the Landfill's footprint vertically or horizontally and would not alter the existing drainage pattern of the site in a manner that could impede or redirect flood flows. The existing Landfill operation operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. The Landfill's 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. The proposed Project would not result in any new significant impacts or more severe impacts to hydrology and water quality beyond those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR found that the construction and operation of the Landfill 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

¹³ Federal Emergency Management Agency (FEMA). 2009. Flood Insurance Rate Map Numbers 06059C0507J and 06059C0526J. December 3.

Deshecha Cañada traverses the Landfill from the northeast to the southwest. The proposed Project would not expand the Landfill's footprint vertically or horizontally, and would not change the on-site flood hazard areas. The existing Landfill operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. The Landfill's 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 Landfill 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 Landfill; therefore, the Landfill 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 Landfill is not in a tsunami inundation area.¹⁴

In conclusion, no impacts would occur related to release of pollutants from inundation from flood hazards, tsunamis, or seiche, and no mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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 with or obstructing the implementation of a water quality management plan, after the implementation of mitigation measures. The existing Landfill operation operates in compliance with Waste Discharge Requirements issued by the California RWQCB, San Diego Region. The Landfill's 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. The Landfill 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 September 2021), 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. The proposed Project would comply with the applicable NPDES permits and implement operational BMPs to reduce pollutants of

¹⁴ California Department of Conservation. Orange County Tsunami Inundation Maps. Website: <https://www.conservation.ca.gov/cgs/tsunami/maps> (accessed July 25, 2023).

concern in stormwater runoff. The proposed Project would not result in any new significant impacts or more severe impacts to hydrology and water quality beyond those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. Therefore, no new or additional mitigation is required.

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 4.14(b) above, the Landfill is not located above a designated groundwater basin. Therefore, there is not an applicable GSP applicable to the Landfill. As such, the proposed Project would not conflict with or obstruct the implementation of a sustainable groundwater management plan. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.15 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. The 2001 GDP EIR 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 4(LS), which is a public facility with a landfill site overlay. In August 2016, the La Pata Gap Extension opened, consisting of a road (Avenida La Pata) built through the Landfill property, connecting San Clemente and San Juan Capistrano.

The First Supplemental EIR to the 2001 GDP EIR concluded that the Second Amendment to the 2001 Prima Deshecha GDP would not change the daily maximum refuse being accepted or permitted at the site. The only element with a minor potential effect on land use was associated with the Pre-mitigation and Regional Environmental Enhancement plans, which could potentially encourage a more passive recreational use along the perimeter of Zone 4 in the post-closure period. Accordingly, the First Supplemental EIR to the 2001 GDP EIR concluded that the previously approved project would not result in a substantial change from the previous analyses contained within the 2001 GDP EIR, and the analyses and mitigation measures outlined in the 2001 GDP EIR were adequate to address potential impacts related to land use and planning.

In January 2021, the CEQA Addendum for the Los Patrones Parkway Extension (LPPE) (Addendum to EIR No. 575 [the 2001 GDP EIR], EIR No. 584, and EIR No. 589), prepared by OC Public Works (OCPW) as the lead agency, concluded the alignment would not physically divide an established community. The alignment is proposed in an area that has not been developed with the approved Ranch Plan uses. The LPPE would be incorporated into the internal circulation network for Planning Area 5 as part of the Master Area Plan and Subarea Plan processes. The LPPE would provide an efficient circulation network by replacing the Cristianitos Road and State Route 241 (SR-241) extensions, which were planned when the Ranch Plan was approved.

The proposed Project would not physically divide an established community since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. The proposed increase in maximum daily operations would not result in conditions that would obstruct access within an established community. **This topic will not be**

analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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 Landfill was included in the Orange County SSHCP. Operation and expansion of the Landfill (including all activities in the 2001 GDP) are covered activities under the SSHCP. As part of the proposed Project, waste would continue to be disposed of in existing areas of the Landfill that are designated for disposal and not within “supplemental open space” areas, 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. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.16 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. The 2001 GDP EIR 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 First Supplemental EIR to the 2001 GDP EIR concluded the previously approved project would not contain any element that would affect or alter the findings of the 2001 GDP EIR with respect to Energy and Mineral Resources. The Landfill development that was analyzed in the 2001 GDP EIR has been in continuous operation since 1976. The proposed Project would not result in any new significant impacts or more severe impacts to mineral resources beyond those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. Therefore, no new impacts to mineral resources would occur. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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 the 2001 GDP EIR has been in continuous operation since 1976. The primary use of the site is not mineral extraction. According to the Orange County General Plan, the Project site is currently designated for landfill operations, which may include materials recovery, recycling facilities, and accessory uses (e.g., borrow site areas, buffer areas, and access roads). The proposed Project would not result in any new significant impacts or more severe impacts to mineral resources beyond those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. Therefore, no new impacts to mineral resources would occur. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.17 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. The 2001 GDP EIR 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. The proposed increase in maximum daily operations as part of the proposed Project would result in additional vehicle trips to and from the Landfill and an increase in the amount of on-site equipment in daily use associated with processing waste, which could increase noise above levels identified in prior CEQA documentation. **This topic will be analyzed in the Subsequent EIR, and mitigation will be developed and included in the Subsequent EIR, if necessary, to address potentially significant adverse Project effects related to potential increases in ambient noise levels due to increased vehicle trips and an increase in the amount of equipment in operation at the Landfill beyond those levels previously analyzed in prior CEQA documentation.**

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

Potentially Significant Impact. The 2001 GDP EIR 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. The proposed increase in maximum daily operations would result in additional vehicle trips and increase the amount of on-site equipment in daily use associated with processing waste. This could incrementally increase groundborne vibration or groundborne noise levels above levels identified in prior CEQA documentation. **This topic will be analyzed in the Subsequent EIR, and mitigation will be developed and included in the Subsequent EIR, if necessary, to address potentially significant adverse Project effects related to potential increases in ambient noise levels due to increased**

vehicle trips to and from the Landfill beyond those levels previously analyzed in prior CEQA documentation.

- 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. The 2001 GDP EIR found that the Landfill operation would not be located within the vicinity of a private airstrip or an airport land use plan. The Landfill 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. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.18 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 checked="" type="checkbox"/>	<input 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)?

Less than Significant Impact. The 2001 GDP EIR found that the construction and operation of the GDP would result in no impacts to population and housing. The First Supplemental EIR to the 2001 GDP EIR concluded the previously approved project would not have elements that could be considered growth-inducing, and no significant incremental impacts were expected related to population and housing. The proposed Project does not include construction of new homes and does not include extension of roads or other infrastructure to previously undeveloped areas. The proposed Project would not create a permanent increase in population or an increased demand for housing in the County or the region. The proposed increase in daily maximum operations is intended to maintain solid waste disposal capacity for existing and planned land use throughout the region; however, solid waste disposal is not presently a limiting factor in determining growth. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR found that the construction and operation of the Landfill would result in no impacts to population and housing. There is no housing on the Landfill; 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. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.19 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. The 2001 GDP EIR found that the construction and operation of the GDP would result in a less than significant impact to fire protection, police protection, schools, parks, and other public facilities. The First Supplemental EIR to the 2001 GDP EIR concluded the previously approved project would not include any elements that would contribute to any change in demand for public services. However, the proposed Project and the increase in operations and associated higher traffic volume on the site would result in a corresponding increase in the potential for on-site fires to occur. Existing policies and programs, including the following, would be adjusted as needed to address the incremental increase in the risk of fire in accordance by ensuring adherence to mitigation measures identified in prior CEQA documents:

- Maintaining on-site operating procedures for the avoidance and control of surface fires, such as the provision of fire extinguishers and watering vehicles, posting of “No Smoking” signs, ground clearing, and general safe operating practices;
- Placement of signs warning motorists of potential fire hazards, fire conditions, and other relevant information; and
- Approval of future grading and building plans by the Orange County Fire Authority.

The proposed Project would not result in any new significant impacts or more severe impacts to other public services beyond those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. 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. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.20 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. The 2001 GDP EIR found that the construction and operation of the Landfill would result in a less than significant impact to recreation. The First Supplemental EIR to the 2001 GDP EIR concluded that the previously approved project would not contain any elements that would be considered growth-inducing, and no impact to local or regional recreational resources was expected. The previously approved project would not alter the 2001 GDP's commitment to incorporate several trails around the perimeter and through the Landfill property, consistent with both County and city (San Juan Capistrano and San Clemente) trail plans and safety considerations associated with Landfill operations. Consistent with the approach contained within the 2001 GDP, the recreational uses would be developed by a needs analysis as Zone 4 closure nears. Therefore, no additional mitigation measures were identified in the First Supplemental EIR to the 2001 GDP EIR.

The proposed Project would not result in any new significant impacts or more severe impacts to recreation beyond those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. OCWR currently allows for an easement with the cities of San Juan Capistrano and San Clemente for a multi-use recreational trail crossing the Landfill property that connects the City of San Juan Capistrano trail system to the City of San Clemente trail system. OCWR will continue to allow the easement for this trail on the Landfill property in the future. Additionally, upon closure of Zone 4, the 2001 GDP proposed the opening of trails along the perimeter of Zone 4 and an ultimate connection to the City trails along Zone 1 of the property. The proposed increase in maximum daily operations will not affect this provision in the 2001 GDP regarding trail use or development. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR found that the construction and operation of the GDP would result in a less than significant impact to recreation. The proposed Project would not result in any new significant impacts or more severe impacts to recreation beyond those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas. OCWR currently allows for an easement with the cities of San Juan Capistrano and San Clemente for a multi-use recreational trail crossing the Landfill property that connects the City of San Juan Capistrano trail system to the City of San Clemente trail system. OCWR will continue to allow the easement for this trail on the Landfill property in the future. As discussed above, the provision in the 2001 GDP related to opening recreational trails along the perimeter of Zone 4 upon its closure will not be impacted by the proposed project. The proposed increase in maximum daily operations will not affect trail use or development. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.21 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section §15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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?

Potentially Significant Impact. The 2001 GDP EIR 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. The proposed Project would not include construction or removal of public roads or other circulation system features. In addition, the proposed Project would not result in any changes to transit, bicycle, or pedestrian facilities. However, Landfill operations require vehicle traffic coming in and out of the Landfill on a daily basis, and the proposed Project would increase daily operations, thereby increasing traffic around the Landfill.

The First Supplemental EIR to the 2001 GDP EIR also concluded the elements of the previously approved project would not affect short- or long-range traffic conditions, as described in the 2001 GDP EIR, as daily refuse tonnages into the Landfill, overall landfill capacity, and land uses would not change. Construction of the elements of the previously approved project will also occur entirely within the boundaries of the Landfill; therefore, no change to the traffic patterns in the surrounding intersections is anticipated. In addition, the CEQA Addendum for the LPPE (Addendum to EIR No. 575 [the 2001 GDP EIR], EIR No. 584, and EIR No. 589) concluded the LPPE would not change the findings identified in the 2001 GDP EIR related to traffic and transportation. The 2001 GDP EIR did not include any mitigation measures because no transportation impacts were identified for any component of the 2001 GDP, and no additional mitigation measures were identified.

The Landfill is located along Avenida La Pata, which is classified by the County of Orange General Plan Circulation Plan Map as a primary arterial highway. The County of Orange General Plan Transportation Element defines a primary arterial highway as a four-lane divided roadway that is designed to accommodate approximately 20,000 to 30,000 vehicle trips per day at LOS C. A primary arterial’s function is similar to that of a major arterial. The County’s Transportation Element has established goals, objectives, and policies that are intended to provide direction for transportation implementation in the County’s unincorporated areas. Because vehicle trips to and from the Landfill

would increase with increased daily operations, the proposed Project has the potential to conflict with a program, plan, ordinance, or policy addressing the circulation system. The proposed Project would increase the number of daily trips, and therefore the severity of impacts, above those previously analyzed in prior CEQA documentation; this threshold will be analyzed in the Subsequent EIR. **This topic will be analyzed in the Subsequent EIR, and mitigation, if needed, will be developed and included in the Subsequent EIR to address potentially significant adverse Project effects beyond those previously analyzed in prior CEQA documentation.**

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?

Potentially Significant Impact. The 2001 GDP EIR found that the construction and operation of the Landfill through completion of the GDP would result in a less than significant impact to transportation. The *State CEQA Guidelines* approach to evaluating transportation impacts has been updated since the certification of the 2001 GDP EIR. Section 15064.3 of the *State CEQA Guidelines* now 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 further 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 proposed Project is neither a land use project nor a transportation project. As discussed in Threshold 4.21 (a), Landfill operations require vehicle traffic coming in and out of the Landfill daily and the proposed Project would increase maximum daily operations; therefore, it would increase traffic around the Landfill. The proposed Project would not develop any new land uses that would contribute to traffic congestion within the area. However, activities associated with processing waste at the Landfill would appreciably change in intensity and frequency due to the increase in daily volume being processed. The number of on-site employees would increase by approximately 35, resulting in additional daily worker trips. Therefore, the proposed Project has the potential to result in additional vehicle trips and include trip-inducing uses for regional daily VMT. **This topic will be analyzed in the Subsequent EIR, and mitigation, if needed, will be developed and included in the Subsequent EIR to address potentially significant adverse Project effects related to consistency with CEQA Guidelines section 15064.3 beyond those previously analyzed in prior CEQA documentation.**

- 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. The 2001 GDP EIR 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. 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. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

- d. Would the project result in inadequate emergency access?*

Less Than Significant Impact. The 2001 GDP EIR found that the construction and operation of the Landfill through completion of the GDP would not result in inadequate emergency access. Specifically, the 2001 GDP EIR evaluated impacts to emergency response as part of the Public Services topic and evaluated impacts associated with adopted emergency response plans as part of the Hazards topic; the EIR concluded that impacts would be less than significant. Site access to the Landfill would continue to be 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. The increase in maximum daily operations would not prevent emergency access to and from the Landfill via Avenida La Pata. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.22 TRIBAL CULTURAL RESOURCES

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

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or*
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Less than Significant Impact. Since certification of the 2001 GDP EIR in November 2001 and certification of First Supplemental EIR to the 2001 GDP EIR in June 2007, there have been several revisions to CEQA and the *State CEQA Guidelines*. CEQA was amended in 2014 to include Tribal Cultural Resources as a separate impact category. Since this occurred after the 2001 GDP EIR was circulated for public review (*State CEQA Guidelines*, Section 15007(c)), tribal cultural resources were not addressed in the Second Supplemental EIR to the 2001 GDP EIR. Nevertheless, consistent with the procedures outlined in Assembly Bill (AB) 52, on July 7, 2020, the County of Orange sent out letters to four tribes that are registered/recognized by the California Native American Heritage Commission as potentially having tribal resources within Orange County. None of the tribes that were contacted requested consultation.

As discussed in Section 4.9, Cultural Resources, the 2001 GDP EIR 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. The proposed Project would not result in any new significant impacts or more severe impacts to archaeological resources beyond those previously analyzed in the 2001 GDP EIR and subsequent investigations, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas analyzed in the 2001 GDP EIR. Furthermore, since the Landfill's refuse limits and property boundary will not be expanded, no additional ground disturbance is required as a result of increasing maximum daily operations.

As noted above, the Second Supplemental EIR to the 2001 GDP EIR included consultation with potentially interested Native American tribes, and no tribal cultural resources were identified at that time. In accordance with AB 52, new outreach will be conducted for the proposed Project to determine whether any previously unidentified tribal cultural resources have the potential to be affected. As there is no new ground disturbance or change in the overall project footprint anticipated, no significant impacts to tribal cultural resources are anticipated. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process or during tribal consultation conducted pursuant to AB 52.**

4.23 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. The 2001 GDP EIR 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.

The First Supplemental EIR to the 2001 GDP EIR concluded that landslide stabilization measures in the vicinity of Zones 1, 4, and 5 would likely impact the SCE and SDG&E easements traversing the center of the Landfill property. It specified that existing transmission lines might have to be temporarily relocated or re-routed in order to avoid service disruption during construction. A project design feature was incorporated into the previously approved project approach which would provide for the replacement of relocated transmission lines once construction is complete. The First Supplemental EIR to the 2001 GDP EIR also concluded that no impacts on natural gas, potable water, nonpotable water, storm drains, and telephone service were expected under the previously approved project and, therefore, no mitigation was required.

The proposed Project will be served by existing utility service providers for water, power, and natural gas. The increase in the number of daily employees on site would not necessitate additional utility connections or facilities, and no significant impacts would occur. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant**

impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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, and would therefore not result in any significant impacts to the availability of water supplies or impacting the water purveyor's ability to supply water. The proposed Project will be served by the existing water service provider. The increase in the number of daily employees on site from approximately 45 to 80 would not be of a scope to materially affect water supplies, and no significant impacts would occur. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR found that the construction and operation of the Landfill through completion of the GDP would not result in impacts to the existing wastewater treatment provider. The proposed Project will be served by existing service providers. The increase in the number of daily employees on site from approximately 45 to 80 would not be of a scope to materially affect wastewater treatment needs, and no new significant impacts will occur. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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. The 2001 GDP EIR 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. The proposed Project will not result in any impacts to solid waste generation or solid waste landfills; rather, it will maintain the regional capacity for solid waste disposal. The proposed Project will be located within existing Landfill development previously analyzed in prior CEQA documents, and the Landfill will continue to serve the solid waste landfill needs of the region. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation 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 4.23.d, above. The 2001 GDP EIR 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. The increase in maximum daily operations will maintain regional solid waste disposal capacity and will not obstruct implementation of statutes and regulations for management and reduction of solid waste. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.24 WILDFIRE

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

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. Since certification of the 2001 GDP EIR in November 2001 and certification of First Supplemental EIR to the 2001 GDP EIR in June 2007, there have been several revisions to CEQA and the *State CEQA Guidelines*. In December 2018, CEQA and the *State CEQA Guidelines* were updated to include questions to the CEQA Appendix G checklist related to the topic of Wildfire. The 2001 GDP EIR evaluated Fire Safety and Control as a topic under Public Safety and Risk of Upset (Section 4.13 of that document). Although impacts were determined to be less than significant, the document included mitigation measures to further reduce the risk of fires. These measures addressed reducing the risks of potential surface fires at the Landfill, responding to surface fires, and existing fire hazards. The First and Second Supplemental EIRs to the 2001 GDP EIR carried these measures forward, although no further analysis specific to this topic was included in the Supplemental EIRs. The 2001 GDP EIR evaluated impacts to emergency response as part of the Public Services topic and evaluated impacts associated with adopted emergency response plans as part of the Hazards topic; the EIR concluded that impacts would be less than significant.

The 2001 GDP EIR found that the construction and operation of the GDP would not introduce new barriers or constraints on emergency response or evacuation. As discussed in Section 4.13, Hazards and Hazardous Materials, the proposed Project does not include any changes to the types or locations of approved activities currently in place within the Landfill development areas and would not require or result in any long-term or permanent lane closures on roadways adjacent to the site. Although this topic was not evaluated as a separate topic in previous CEQA documents, it was evaluated as part of the Public Services and Hazards topics in the 2001 GDP EIR and no significant impacts were anticipated. **This topic will not be analyzed further in the Subsequent EIR unless new information**

identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.

- b. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

Less Than Significant with Mitigation Incorporated. The 2001 GDP EIR found that the construction and operation of the GDP would result in a less than significant impact related to fires after the implementation of mitigation measures. Although impacts were determined to be less than significant, the document included mitigation measures to further reduce the risk of fires. These measures addressed reducing the risks of potential surface fires at the Landfill, responding to surface fires, and existing fire hazards. As discussed in Section 4.13, Hazards and Hazardous Materials, according to the CAL FIRE 2023 Orange County State Responsibility Area Fire Hazard Severity Zones Map, the eastern half of the Landfill (east of Avenida La Pata) is located in a VHFHSZ while the western half is located in an LRA.¹⁵ This is consistent with the County's General Plan Safety Element Fire Hazard Severity Zones Map. According to CAL FIRE's California Fire Hazard Severity Zone Viewer (2020), the Household Hazardous Waste Collection Centers and parking facilities at the Landfill are within a designated SRA moderate FHSZ.¹⁶

Potential impacts from fires were analyzed in the 2001 GDP EIR and subsequent CEQA documents. The proposed Project would not result in any new significant impacts or more severe impacts from wildland fires beyond those previously analyzed, since the proposed Project does not include any changes to the types or locations of approved activities within the Landfill development areas and would not affect slope, prevailing winds, or other factors that would exacerbate fire risk. Although the number of employees on site would increase from approximately 45 to 80, this would not materially affect the potential exposure of occupants to pollutant concentrations from a wildfire or risks associated with the potential spread of a wildfire. No changes would be required to the Landfill's existing fire control system. Therefore, no new or additional mitigation is required. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

- c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

Less than Significant Impact. The Landfill has adequate infrastructure in place, including roads, emergency water sources, and power lines, to accommodate the proposed increase in maximum daily

¹⁵ California Department of Forestry and Fire Protection (CAL FIRE). 2023. Fire Resources Assessment Program. State Responsibility Area Fire Hazard Severity Zone Orange County. Website: https://osfm.fire.ca.gov/media/ovnbxhd/fhsz_county_sra_11x17_2022_orange_2.pdf (accessed July 25, 2023).

¹⁶ California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Resources Assessment Program. California Fire Hazard Severity Zone Viewer. Website: <https://egis.fire.ca.gov/FHSZ/> (accessed July 25, 2023).

operations. No new installation or maintenance activity would be required that would have the potential to exacerbate fire risk or result in impacts to the environment. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

- d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Less than Significant Impact. The proposed Project would not alter the existing or projected future characteristics of the Landfill, including existing or final topography, geologic stability, and landslide remediation projects. There would be no change in the exposure of people or structures to significant risks as a result of changed conditions (including runoff, slope instability, and drainage changes) following a fire. **This topic will not be analyzed further in the Subsequent EIR unless new information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

4.25 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 4.8, 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 species. Furthermore, the proposed Project would not interfere with the implementation of mitigation measures that have already been or will be implemented for the Landfill development project previously analyzed in the 2001 GDP EIR and subsequent CEQA documentation. In addition, as discussed in Section 4.9, the proposed Project would not impact archaeological resources, nor would it interfere with the implementation of mitigation measures that have already been implemented for the Landfill development project. **These topics will not be analyzed further in the Subsequent EIR unless new information identifying them as having a potentially significant impact not previously analyzed in prior CEQA documentation is presented during the scoping process.**

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- 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 Section 4.7, Air Quality; Section 4.10, Energy; Section 4.11, Greenhouse Gas Emissions; Section 4.13, Hazards and Hazardous Materials; Section 4.17, Noise; and Section 4.21, Transportation, cumulatively considerable impacts could result from implementation of the Project beyond the scope of those identified in prior CEQA documentation. As described in Section 3.5, a list of related projects will be developed for the Subsequent EIR to inform the cumulative impacts analysis. **These topics will be analyzed in the Subsequent EIR and, if necessary, mitigation will be developed and included in the Subsequent EIR to address potentially significant adverse Project effects beyond what was analyzed in prior CEQA documentation.**

- 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. Specifically, potentially significant air quality, hazards and hazardous materials, and noise impacts have the potential to affect human beings. **These topics will be analyzed in the Subsequent EIR and, if necessary, mitigation will be developed and included in the Subsequent EIR to address potentially significant adverse Project effects beyond what was analyzed in prior CEQA documentation.**

5.0 SUMMARY OF MITIGATION MEASURES AND PROJECT DESIGN FEATURES

All mitigation measures, design features, and other environmental commitments identified in the prior CEQA documentation (refer to Section 1.12 for details), the 2001 GDP as amended, and applicable permit conditions from Resource Agencies (including SCAQMD and RWQCB) would remain in effect for the Landfill development and operations, including the increase in permitted daily operations proposed by this Project.

The Subsequent EIR will include additional mitigation measures and project design features if it is determined that they are needed to address potentially significant impacts.

6.0 REFERENCES

- California Department of Conservation. California Important Farmland Finder. Website: <https://maps.conservation.ca.gov/dlrp/ciff/> (accessed July 25, 2023).
- _____. Maps and Data. Website: <https://maps.conservation.ca.gov/cgs/DataViewer/> (accessed June 26, 2023).
- _____. Orange County Tsunami Inundation Maps. Website: <https://www.conservation.ca.gov/cgs/tsunami/maps> (accessed July 25, 2023).
- California Department of Conservation, Division of Mines and Geology. 1981. *Generalized Aggregate Resource Classification Map, Orange County –Temescal Valley*. Website: <https://maps.conservation.ca.gov/cgs/informationwarehouse/mlc/> (accessed July 26, 2023).
- California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Resources Assessment Program. California Fire Hazard Severity Zone Viewer. Website: <https://egis.fire.ca.gov/FHSZ/> (accessed July 25, 2023).
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