## ENVIRONMENTAL FACT SHEET FOR PRIMA DESHECHA LANDFILL

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The following provides an overview of the California Environmental Quality Act (CEQA) documents and environmental resource categories that have been assessed for impacts for the landfill from the original siting in 2001 to the current proposal to increase tonnage in 2023. The existing siting, development, construction, operation and build out of the landfill has been the topic of previous environmental review and documentation.

The project being proposed increases the permitted daily maximum tonnage received at the Prima Deshecha Landfill from 4,000 to 8,000 tons per day. OC Waste & Recycling (OCWR) has prepared the following information to provide context of the proposed project with past environmental review and documentation. Below is the history of this technical information, with direct links provided for additional detail.

## BACKGROUND

The Olinda Alpha Landfill in Brea, the Prima Deshecha Landfill in San Juan Capistrano, and the Frank R. Bowerman Landfill in Irvine make up the waste management system that serves the 3.2 million residents and the businesses in the County of Orange (County). Upon closure of the Olinda Alpha Landfill, the County waste system will have the two remaining disposal locations, the Prima Deshecha Landfill in San Juan Capistrano opened in 1976 and the Frank R. Bowerman Landfill opened in 1990. As a result of the pending Olinda Alpha Landfill closure, the necessary steps are being made to ensure that County residents and businesses have sufficient disposal capacity within the landfill system. The current systemwide disposal capacity is 23,500 tons per day, and with the imminent closure of the Olinda Alpha Landfill, that represents a loss of 8,500 tons per day of capacity. The proposed increase of 4,000 tons per day capacity at Prima will reduce the overall County capacity to 19,500 tons per day for the landfill system. The disposal capacity is not reflective of actual disposal tons but to maintain sufficient capacity because of the need for disaster debris management, holiday tonnage fluctuation, local waste collection, emergency management preparedness, and collectively serves to protect public health and the environment by managing all the County generated waste. The following Environmental Fact Sheet for Prima Deshecha Landfill is meant to further provide transparency to the efforts to continue to serve the residents and businesses. To understand more about how the waste is managed in the County, the requirements of SB 1383 compliance and how to get free compost, please visit the OCWR website at oclandfills.com. Guided tours are available upon request at https://oclandfills.com/landfills/landfill-tours

## **OVERVIEW**

Comments raised during the Scoping Public Meeting held on October 4, 2023, and during the comment period from September 27 – October 27, 2023, pertained to a wide range of landfill related issues. Many of the comments received have been determined to be outside the scope of the current project that is being proposed and are therefore not included in the current proposed CEQA document. Therefore, OCWR is providing additional background information to help clarify what is being proposed now and what has previously been approved with prior CEQA documents.

**Section 1** focuses on the existing environmental documentation (CEQA documents) that have already been approved for the continual operation and development of the landfill, starting with the General Development Plan (GDP) Environmental Impact Report (EIR) in 2001 which focused on development of the landfill through buildout. Subsequent EIRs and Addendums to the GDP EIR are also briefly described and include information on the year they were prepared and the project elements that were the focus of the CEQA document.

**Section 2** lists the environmental resource categories that were thoroughly evaluated in those prior CEQA documents and what types of measures were adopted to reduce potentially significant impacts of those projects. While many categories were assessed in prior documents, this summary focuses on those that were of concern based on comments received during the recent public scoping review period.

**Section 3** provides a summary of the currently proposed project and lists the environmental resource categories that are being evaluated in connection with the currently proposed project.

## SECTION 1- PREVIOUS CEQA DOCUMENTATION FOR THE LANDFILL:

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

EIR 575, which was approved in 2001, served as a Project EIR for near-term projects development and as a Programmatic EIR for long-term development of the project site. This EIR analyzed impacts associated with development of a landfill with a total design capacity of approximately 53.1 million cubic yards for the area known as Zone 1 on 271 acres with a maximum design elevation of 600 feet Above Mean Sea Level (AMSL). The EIR also looked at the development of an area known as Zone 4 with a total design capacity of approximately 118.5 million cubic yards on 409 acres at a maximum design elevation of 1,010 feet AMSL.

At the time of approval, the estimated closure dates of 2019 for Zone 1 and 2067 for Zone 4 were based on the maximum volume of trash received at the landfill capped at 4,000 tons per day (TPD). EIR 575 assessed impacts from all proposed activities and when the CEQA document was adopted, several mitigation measures were incorporated to reduce environmental impacts. Mitigation measures that were incorporated in EIR 575 include, but are not limited to, geotechnical analysis; approved liner design plans; approved leachate control system; groundwater monitoring contained in Waste Discharge Requirements (WDRs); compliance with Stormwater Pollution Prevention Plans (SWPPP); compliance with National Pollutant Discharge Elimination Systems (NPDES); habitat restoration, focused species surveys, and avoidance and monitoring during construction phases; implementation of Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP); incorporation of all feasible dust control measures; implementation of odor minimization measures; use of an archaeologist and paleontologist to ensure adequate identification and salvage of fossil and cultural resources materials during site preparation and excavation activities; and limited construction hours to reduce noise exposure. Mitigation measures are active throughout all phases of the project, including design, construction and operation.

Stemming from preparation of EIR 575, OCWR also prepared Amendment No. 1 to the GDP in October 2002 as an outcome of negotiations between the County and the Rancho Mission Viejo Company, LLC (RMV) who owns the adjacent land to the north and east of the Prima Deshecha Landfill. These

negotiations resulted in RMV agreements which affect 945 acres of the eastern portion of the landfill and specify conditions and restrictions for the site. One design change to the 2001 GDP due to the RMV agreements was a reduction in the Zone 4 refuse footprint from 412 acres to 409 acres to further reduce the proximity of waste limits to RMV developments to the northeast. The total Zone 4 disturbed surface area (including exterior cut slopes) remained the same at 473 acres. This was put into effect to ensure a buffer between planned housing communities and the landfill.

### Supplemental EIR No. 597 (SEIR) to the 2001 GDP EIR

Supplemental EIR 597 (SEIR), which was approved in 2007, supplemented and built upon the existing GDP EIR 575 and looked at impacts associated with a new project which included increased grading disturbance and landfill excavation limits for both the Zone 1 and Zone 4 to allow for future landslide remediation projects; re-design of future desilting basins for the Zone 4 landfilling area; and changing the significance conclusion of the air quality section from less than significant with mitigation to unavoidable significant adverse impact with incorporation of mitigation measures. The CEQA document evaluated and determined impacts from all proposed project activities. Mitigation measures from GDP EIR 575 were carried over to SEIR 597, including but not limited to those referenced above, and as detailed in the Mitigation Monitoring and Reporting Program (MMRP) for these documents. New mitigation measures adopted in SEIR 597 included compliance with the OC Drainage Area Management Plan; various air quality measures including Particulate Matter (PM10) control measures, additional dust control measures, mobile equipment emissions controls; increased requirements for sensitive species survey; and avoidance or replacement in kind of disturbed habitat mitigation areas in accordance with adopted plans.

### Second Supplemental EIR (SSEIR) to the 2001 GDP EIR

The Second Supplemental EIR (SSEIR), which was approved in 2022, focused on the Zone 4 construction projects and the associated environmental impacts. Specifically, the project 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; provided additional evaluation regarding removal of breccia rock formations, including

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; and allowed for the import of approximately 8,108 cubic yards of soil for liner installation that will occur for all Zone 4 development phases through build-out. The SSEIR assessed impacts from all proposed activities. Mitigation measures from previous documents were carried over as they apply to each phased landfill plan as referenced above and further detailed in the MMRP.

**CEQA Addenda to Existing EIRs** - From 2003-2021 a total of 16 Addenda to existing EIRs were prepared by OCWR, which entail only minor changes to the original analyses. Details on these addenda are described in the initial study for the project that is currently being proposed.

Prior EIRs can be found at <u>https://oclandfills.com/page/technical-documents-photos</u>. These prior environmental documents studied various environmental topics in detail per CEQA guidelines. While all environmental topics required by CEQA guidelines were analyzed, specific mitigations were developed for



environmental topics for which significant impacts were identified. These mitigation measures continue to apply to all landfill development, and were identified for the following areas of concern:

- Topography
- Geology, seismicity, soils and groundwater
- Surface hydrology
- Water quality
- Biological resources
- Cultural/scientific resources
- Land use/planning
- Air quality
- Noise
- Aesthetics
- Public safety
- Transport of disease vectors
- Utilities
- Light and Glare
- Geophysical

All prior EIR documents were adopted by the Orange County Board of Supervisors in its capacity as a decision-making body. The Mitigation Monitoring and Reporting Program (MMRP) documenting all adopted mitigation measures for the landfill from previous environmental documents have been added to the Subsequent EIR project webpage at: <a href="https://oclandfills.com/PrimaSEIRtonnage">https://oclandfills.com/PrimaSEIRtonnage</a>

### SECTION 2 - ENVIRONMENTAL RESOURCE CATEGORIES PREVIOUSLY ASSESSED:

OCWR is providing the following additional background information on environmental resource categories assessed in previous CEQA documents which have all gone through a public review process. Note that additional categories were assessed, and further details can be found in the documents referenced above, however below are the key categories for which most comments were received during the recent public scoping review period which concluded on October 27, 2023.

### **Air Quality**

Air quality has been a major resource category which has been assessed in a majority of previously prepared EIRs and environmental documents for the landfill. 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, with regards to a significant net increase of any air pollutants for which the region is in non-compliance with federal or State air quality standards after the implementation of mitigation measures. The SEIR 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 SEIR updated the impact conclusion for air quality effects to reflect a conclusion of "significant after mitigation" based on changes to the State CEQA Guidelines. Mitigation measures that have been implemented and carried forward during development of landfill

phases include, but are not limited to, adding neutralizing agents to reduce odor; covering the waste area daily; continual inspections of the landfill cover and for odor detection; installation of landfill gas (LFG) control systems to maximize collection of LFG and continuous monitoring; periodic odor surveys and implementation of appropriate corrective action measures as soon as possible; spraying of water to reduce dust and emissions; rejecting dusty or odorous loads; spraying water on unpaved roads; and restricting vehicular traffic on unpaved roads to the greatest extent possible. The Second Supplemental EIR to EIR 575 also examined air quality and conducted air quality modeling associated with the project.

### **Hazardous Materials**

The 2001 GDP EIR found that the construction and operation of the landfill would result in a less than significant impact with regard to hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials after the implementation of mitigation measures. The project site is a solid waste landfill that accepts municipal solid waste and nonhazardous waste materials. However, the landfill has the potential to accept household hazardous waste (HHW) that is mixed in with regular commercial and residential solid waste. The amount of HHW disposed of in the landfill is significantly limited by implementing the following control measures: (1) the majority of solid waste materials received at the landfill are first processed at other off-site materials recovery facilities/transfer stations where HHW is 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; (3) the landfill maintains 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; and (4) OCWR operates and maintains a HHW collection center directly at the landfill so that any items can be temporarily stored on site and then transported off-site for proper disposal in accordance with all federal, state, and local requirements; and (5) waste inspectors monitoring disposal also flag any materials observed that should be turned away or removed from the disposal waste stream. 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. Site staff conduct daily inspections to ensure that the landfill follows all the permit conditions imposed by regulatory agencies having jurisdiction over landfills.

Based on public comments, the proposed Subsequent EIR will also take an in-depth look at the hazard potential for falling debris from waste-hauling trucks. Any identified significant impacts will be mitigated to the greatest extent possible. Specific methodology and potential mitigation measures will be evaluated in the proposed CEQA document.

### Water Quality

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, after the implementation of mitigation measures. The landfill is in continual compliance with National Pollutant Discharge Elimination System (NPDES) and Industrial General Permit (IGP) requirements for industrial discharges and has a Water Quality Management Plan (WQMP). The proposed project will follow the applicable NPDES permits, implement operational Best Management Practices (BMPs) to minimize pollutants of concern in stormwater runoff

and adhere to the WQMP. The landfill's stormwater collection and control system are composed 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 current proposed project would be adequately supported by the existing stormwater system and would not result in any new significant impacts or more severe impacts to hydrology and water quality beyond those previously analyzed. This is because the proposed project does not include any changes to the types or locations of approved activities within the landfill development areas. As such, no new or additional mitigation will be required. The existing landfill operates in compliance with all Waste Discharge Requirements (WDRs) issued by the California Regional Water Quality Control Board, (RWQCB), San Diego Region. Any discharges from the landfill are in strict compliance with adopted standards and regulations to ensure the protection of public health.

### Noise

Noise has been a major resource category that has been assessed in a majority of the previously prepared EIRs for the landfill. 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. Noise measures are incorporated to reduce noise impacts on residential uses adjacent to the site and include the use of landscaping, berms at the face of each landfill lift, phased construction of the landfill areas and the use of buffer areas between noise sources and sensitive receptors. Noise is also controlled through the proper maintenance of the construction equipment, including trucks, bulldozers, and other mobile and fixed construction equipment. During construction operations, OCWR also mitigates noise levels by limiting the construction hours.

### **Transportation and Traffic**

Traffic has been a major resource category that has been assessed in a majority of the previously prepared EIRs for the landfill. 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 SEIR 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 was anticipated. In addition, the CEQA Addendum for the Los Patrones Parkway Extension (LPPE) prepared by OC Public Works (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.

### **Biological Resources**

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. To date OCWR has either fully implemented or will soon implement all mitigation measures for biological resources included in the 2001 GDP EIR. A primary purpose of previously approved projects 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, stabilization and ongoing operation and management of the landfill. The SEIR incorporated changes and additional mitigation to avoid or substantially lessen the significant environmental effects on biological resources. Implementation of mitigation measures in previous CEQA documents reduced potential significant adverse impacts of proposed projects related to biological resources to a less than significant level. In addition, Addendum No. 8 to the 2001 GDP EIR approved the 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 Non-wetland/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.

OCWR is signatory to the Southern Sub-Region Habitat Conservation Plan (HCP). Participation in the HCP requires OCWR to mitigate for biological impacts associated with landfill buildout. In total, OCWR has restored over 200 acres of various habitat types including native grasslands, riparian and wetlands, and coastal sage scrub on the property at the landfill, which will be protected and maintained in perpetuity. OCWR has also partnered with the Irvine Ranch Conservancy and OC Parks to conduct habitat restoration within Trabuco Creek at O'Neill Regional Park as mitigation for Prima Landfill development. OCWR has also obtained all necessary permits from the CA Department of Fish & Wildlife (CDFW), Army Corps of Engineers (Corps), and Regional Water Quality Control Board (RWQCB) for the development of the landfill including Zone 4. Regular surveys are conducted at the site for the presence of sensitive species, and mitigation measures adopted for the project provide for monitoring of all construction activities.

### Aesthetics

The 2001 GDP EIR found that the construction and operation of the landfill through buildout would result in an unavoidable significant adverse impact to aesthetics and substantially degrade the existing visual character of the site and its surroundings even after the implementation of mitigation measures. As mitigation, OCWR implemented landscape standards for plantings in areas to be revegetated or screened from view. Other mitigation measures were included in the design that ensured that the siting of permanent aboveground structures was not placed along ridgelines so as not to interrupt the natural horizon line in the existing landscape. The 2001 GDP EIR did not find that the project would result in impacts to scenic vistas, and historic buildings within a State Scenic Highway. Final landfill grades for Zone 1 were kept below the major ridgelines which form the northern and western edges of the site boundary to ensure landfill grades are not visible from Ortega Highway, the valleys of San Juan Capistrano, and the Truman Benedict Elementary School in Forster Ranch in San Clemente, which is consistent with the MOUs on record with the cities of San Juan Capistrano and San Clemente. A Viewshed Protection Plan (VPP) was

also developed cooperatively between the County and the City of San Clemente as part of a condition for certification of EIR 575 to protect views from the south in the City of San Clemente, which has been implemented in advance of Zone 4 operations.

### Wildfire

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 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.

## SECTION 3 - CURRENT PROPOSED PROJECT AND PROPOSED ENVIRONMENTAL ANALYSES

The proposed project would increase the maximum amount of waste that the landfill is able to accept daily from 4,000 to 8,000 tons per day. Waste would continue to be disposed of in existing areas of the landfill (Zone 1 and Zone 4) 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 if another OCWR facility is temporarily closed, which could occur because of a freeway closure or other unforeseen events, necessitating diversion of waste to another landfill. The project will allow OCWR to continue to serve Orange County residents by maintaining systemwide tonnage capacity after the closure of the Olinda Alpha Landfill in Brea, expected as early as 2026.

Based on the initial study that has been prepared for the proposed project, OCWR is already anticipating that the following environmental topics will be further analyzed in the Subsequent EIR: air quality (air, dust, odor, health risk), energy, greenhouse gas emissions, hazards and hazardous materials (road debris), noise, and transportation/traffic. The draft Subsequent EIR will also include an alternatives analysis and will examine cumulative impacts. Other environmental topics were also examined in the initial study, however, will not be further examined in the Subsequent EIR since it has been determined that the proposed project would not result in any new significant impacts or more severe impacts as compared to what has already been analyzed and mitigated in previous environmental documents.



### **Air Quality**

The proposed 2023 Subsequent EIR will again take a deep dive into the existing air quality, the impacts of the proposed project, and will incorporate any necessary new mitigation measures. Specialized air quality studies will be conducted to reach a significance determination. Specifically, a health risk assessment, a greenhouse gas analysis, a toxic hot spot analysis, and a quantitative odor analysis will be conducted. The focus will be on how an increase in emissions could affect sensitive receptors, i.e., residential communities surrounding the proposed project. The findings will be presented in the Subsequent EIR and shared with the public for review.

### Hazards/Hazardous Materials

Based on public comments, the proposed Subsequent EIR, will also take an in-depth look at the hazard potential for falling debris from waste-hauling trucks. Any identified significant impacts will be mitigated to the greatest extent possible. Specific methodology and potential mitigation measures will be evaluated in the proposed CEQA document.

### Noise

The proposed increase in maximum daily operations 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 further analyzed in the proposed Subsequent EIR, and an in-depth noise analysis will be conducted. As part of the site-specific noise analysis mitigation measures 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.

### **Transportation and Traffic**

The currently proposed project would not include construction or removal of public roads or other circulation system features. However, landfill operations require vehicle traffic coming in and out of the landfill daily, and the proposed project would increase daily operations, thereby increasing traffic around the landfill. Traffic will be a major topic in the Subsequent EIR, and an in-depth traffic study will be conducted, which will consist of looking at a number of intersections and conducting traffic counts. The traffic study will determine potentially significant impacts and mitigation measures, 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.

### **Biological Resources**

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. Existing mitigations adopted for previous CEQA documents, included, but are not limited to, wildlife surveys, resource agency approved plans, and avoidance of



construction activity during nesting and breeding seasons. In conclusion, the proposed project will not result in further impacts beyond what was assessed in previous EIRs. Therefore, this topic will not be further analyzed in the Subsequent EIR.

Topics from Scoping Comment Period Not Requiring Additional Analysis in Subsequent EIR - for additional details, please see the initial study at https://oclandfills.com/PrimaSEIRtonnage.

### Water Quality

The proposed project will be in compliance with the applicable NPDES permits, implement operational Best Management Practices (BMPs) to minimize pollutants of concern in stormwater runoff and adhere to the WQMP. The landfill's stormwater collection and control system consist of a series of concrete drainage channels, berms, and both earthen and concrete-lined desilting basins that are designed to control stormwater runoff and protect water quality. The proposed increase in the maximum daily operations would be adequately supported by the existing stormwater system, because the proposed project will not impact stormwater volume at the landfill. 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 will be required. The existing landfill operates in compliance with all Waste Discharge Requirements (WDRs) issued by the California Regional Water Quality Control Board, (RWQCB), San Diego Region. Any discharges from the landfill are in strict compliance with adopted standards and regulations to ensure the protection of public health.

### Aesthetics

The proposed project would allow the landfill to accept more daily waste, 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. The proposed project would not damage scenic resources; or substantially degrade the visual character or quality of public views of the site and its surrounds beyond those previously identified in the 2001 GDP EIR. The proposed project would also not have a substantial adverse effect on a scenic vista. In conclusion, the proposed project will not result in further impacts beyond what was assessed in previous EIRs, because the elevation is not changing, nor is the footprint changing. Therefore, this topic will not be further analyzed in the Subsequent EIR.

### Wildfire

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. This topic will not be analyzed further in the Subsequent EIR as there is no new substantive information identifying it as a potentially significant impact not previously analyzed in prior CEQA documentation.



## CONCLUSION

The initial study (which can be found at https://oclandfills.com/PrimaSEIRtonnage) has been prepared for the proposed project goes into greater detail for each environmental category, and additional detail on prior assessments into each category can also be found in previous environmental documents referenced above, available for review at <a href="https://oclandfills.com/page/technical-documents-photos">https://oclandfills.com/PrimaSEIRtonnage</a>) has been prepared for the proposed project goes into greater detail for each environmental category, and additional detail on prior assessments into each category can also be found in previous environmental documents referenced above, available for review at <a href="https://oclandfills.com/page/technical-documents-photos">https://oclandfills.com/page/technical-documents-photos</a>.

THE PROPOSED CEQA DOCUMENT (SUBSEQUENT EIR) WILL HAVE SPECIALIZED STUDIES FOCUSED ON EVALUATING POTENTIAL IMPACTS FROM AIR QUALITY, NOISE, ENERGY, TRANSPORTATION/TRAFFIC, GREENHOUSE GAS EMISSIONS, AND HAZARDS/HAZARDOUS MATERIALS. ANY SIGNIFICANT IMPACTS IDENTIFIED IN THE SUBSEQUENT EIR WILL RESULT IN THE INCORPORATION OF MITIGATION MEASURES TO REDUCE IMPACTS TO THE GREATEST EXTENT POSSIBLE. THE DRAFT SUBSEQUENT EIR WILL BE MADE AVAILABLE FOR PUBLIC REVIEW AND COMMENT FOR 45 DAYS, ANTICIPATED IN THE SUMMER OF 2024.