Addendum No. 6 to Certified Final EIR No. 588 Regional Landfill Options for Orange County (RELOOC) Strategic Plan Olinda Alpha Landfill Implementation – Revision to Solid Waste Facility Permit to Update Landfill Closure Date

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Proposed Project: **Addendum No. 6 to Final EIR No. 588 (SCH #2004011055) Regional Landfill Options for Orange County (RELOOC) Strategic Plan Olinda Alpha Landfill Implementation – Revision to Solid Waste Facility Permit to Update Landfill Closure Date (OC Waste & Recycling Log # 634)**

1.0 INTRODUCTION

The Olinda Alpha Landfill (landfill) is a Class III municipal solid waste landfill owned by the County of Orange and operated by OC Waste & Recycling (OCWR). The landfill site is located in unincorporated Orange County, north of the City of Brea. The address of the landfill is 1942 N. Valencia Avenue. The location of the landfill is shown on **Figure 1**. The current Solid Waste Facility Permit (SWFP) for the landfill allows the landfill operation to accept up to 8,000 tons per day (TPD) of solid waste for 271 operating days per year and up to 10,000 TPD for up to 36 operating days per year (i.e., the landfill is open for a total of 307 operating days per year, closed on Sundays and the six major holidays). Pursuant to a 2009 Cooperative Agreement between the County of Orange and the City of Brea, the County of Orange has agreed not to accept more than an annual daily average of 7,000 TPD.

The landfill operates under the regulatory authority of several agencies that have issued permits for landfill operations which include the California Department of Resources Recycling and Recovery (CalRecycle); the Orange County Health Care Agency, Environmental Health Division, acting in its role as the Orange County Solid Waste Local Enforcement Agency (LEA) for CalRecycle; the California Regional Water Quality Control Board, Santa Ana Region (RWQCB) and the South Coast Air Quality Management District (SCAQMD).

Final EIR No. 588

On April 17, 2007, the Orange County Board of Supervisors (Board) certified Final EIR No. 588 (SCH #2004011055) that analyzed the vertical and horizontal expansion of the existing Olinda Alpha Landfill operation to provide additional disposal capacity within the landfill property boundary. By certifying Final EIR No. 588, the Board authorized a 115 foot vertical increase in height for the landfill operation from its then permitted elevation of 1,300 feet above mean sea level (AMSL) to a maximum of 1,415 feet AMSL. In addition, the Board authorized a 33-acre horizontal expansion of the landfill operation. The horizontal expansion included landform modifications on the northeast part of the existing landfill property. The maximum daily tonnage limit for the landfill remained at 8,000 TPD and the annual average daily tonnage limit remained at 7,000 TPD. Final EIR No. 588 anticipated that the landfill would operate until reaching the maximum landfill elevation of 1,415 feet AMSL. At that time, it was anticipated that the landfill would reach this final elevation by December 31, 2021. Thereafter, OCWR applied for a revision to the existing landfill SWFP, which was issued by the LEA, acting on behalf of CalRecycle. Final EIR No. 588 is included on OCWR's website at www.oclandfills.com.

Cooperative Agreement with City of Brea

On July 14, 2009, the County and City of Brea entered into a Cooperative Agreement that provided financial compensation to the City for the expansion and continued operation of the landfill until the landfill reaches its design buildout final elevation of 1,415 feet AMSL. Funding

provided to the City by the County in the form of lumpsum payments and per/ton Host Fees have provided over $30 million to the City for all costs incurred by the City related to the operation of the landfill and are intended to assist the City in paying for community amenities including but not limited to environmental and transportation improvements, open space acquisition, parks and trails development, equestrian and recreational facilities. As part of the Cooperative Agreement, the City allowed OCWR to implement the Management of High Tonnage Days project, discussed below, to accommodate additional tonnage that is ordinarily received at the landfill following major holidays. The Cooperative Agreement is included as **Appendix A**.

Addendum No. 5 to Final EIR No. 588
Addendum No. 5 to Final EIR No. 588 analyzed the potential environmental impacts associated with the Management of High Tonnage Days project, which allows the landfill to accept up to 10,000 TPD of solid waste per day for up to 36 days per year, for high tonnage days that primarily follow major holidays. Traffic, air quality/greenhouse gas emissions and noise analyses were completed and found that there would be no new significant traffic, air quality/greenhouse gas emissions or noise impacts or a substantially worsening of existing impacts, when compared to the traffic, air quality/greenhouse gas emissions and noise impacts included in Final EIR No. 588. Similar to Final EIR No. 588, Addendum No. 5 to Final EIR No. 588 assumed that the landfill would operate until reaching its maximum design elevation of 1,415 feet AMSL, which was anticipated to occur by December 31, 2021. Addendum No. 5 to Final EIR No. 588 for the Management of High Tonnage Days project was approved by the Director of OCWR on March 31, 2014. Thereafter, OCWR applied for a revision to the existing landfill SWFP, which was issued by the LEA, acting on behalf of CalRecycle on June 8, 2015. Addendum No. 5 to Final EIR No. 588 is included as **Appendix B**.

Addendum No. 6 to Final EIR No. 588 (Proposed Project) OCWR is seeking a revision to the landfill SWFP with the LEA and CalRecycle to allow OCWR to update the closure date for the landfill from December 31, 2021 to December 31, 2036 (the "Project"). OCWR is not requesting any major changes to the landfill operation, rather the landfill is taking longer to fill up than originally anticipated for the reasons discussed below, that are more fully analyzed and discussed in **Appendix C**.

- Actual daily solid waste tonnage received at the landfill has been considerably less than the 8,000 TPD projected and analyzed in Final EIR No. 588, primarily due to the Great Recession and because of increased waste diversion and recycling required by State law. As shown in **Appendix D**, the actual average daily tonnage received at the landfill from 2008-2019 was approximately 5,924 TPD, much less than the permitted 8,000 TPD analyzed in Final EIR No. 588.

- The use of alternative daily cover including geosynthetic tarps and processed green material, instead of solely using soil for daily cover, has resulted in a significant capacity savings at the landfill. Beginning in 2020, processed green material is no longer used for alternative daily cover, but geosynthetic tarps will continue to be used for alternative daily cover.

- The long-term effects of settlement at the landfill have been greater than originally anticipated, resulting in a significant capacity savings.

- More efficient refuse placement and compaction methods have been utilized at the landfill, which use up less landfill capacity when compared to older methods.

Table 1 provides a comparison of the project that was approved in Final EIR No. 588, the project that was approved in Addendum No. 5 to Final EIR No. 588, and the Project that is being analyzed in this Addendum No. 6 to Final EIR No. 588 for the revision to the landfill's SWFP that will allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036:

Table 1 – Comparison of Project Analyzed in Final EIR No. 588, Project Analyzed in Addendum No. 5 to Final EIR No. 588 and Proposed Project Analyzed in Addendum No. 6 to Final EIR No. 588

Landfill Design and Operation Element	**Final EIR No. 588**	**Addendum No. 5 to Final EIR No. 588**	**Proposed Project – Addendum No. 6 to Final EIR No. 588**
Maximum Daily Permitted Tonnage	8,000 TPD maximum daily tonnage; 7,000 TPD maximum annual average daily tonnage	10,000 TPD maximum daily tonnage up to 36 operating days per year; 8,000 TPD maximum daily tonnage 271 operating days per year; 7,000 TPD maximum annual average daily tonnage	No change
Permitted Area	453 acres	No change	No change
Total Permitted Design Capacity	148.8 million cubic yards	No change	No change
Maximum Elevation	1,415 feet AMSL	No change	No change
Maximum Depth	415 feet	No change	No change
Estimated Design Capacity Closure Date	*December 31, 2021*	No change	*December 31, 2036*

As shown in **Table 1**, the proposed revision to the landfill SWFP to allow an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any increases to the following: (1) maximum daily permitted tonnage, (2) volume of accepted solid waste, (3) development footprint, (4) design capacity, (5) the slopes of the ultimate fill grading plans, (6) permitted depth of waste or (7) the landfill final elevation of 1,415 feet AMSL as analyzed in Final EIR No. 588. As discussed and analyzed below, Addendum No. 6 to Final EIR 588 is the appropriate CEQA document for the proposed update to the landfill closure date since there are no major changes to the existing landfill operation, which is taking longer to fill up than originally anticipated. As the analysis will show below, the proposed update of the landfill closure date will not result in any new significant environmental impacts that were not

previously analyzed in Final EIR No. 588, nor will the Project result in a substantial worsening of any significant environmental impacts that were previously analyzed in Final EIR No. 588.

1.1 Standards for Preparing an Addendum

California Code of Regulations Title 14 ("CEQA Guidelines"), Section 15164 "Addendum to an EIR or Negative Declaration", states the following:

(a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

CEQA Guidelines Section 15162(a) "Subsequent EIRs and Negative Declarations", states the following:

(a) When an EIR has been certified or negative declaration adopted 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 or negative declaration 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 or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(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 as complete or the negative declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(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; or

(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."

1.2 Addendum No. 6 to Final EIR No. 588 - Changes to Final EIR No. 588

Addendum No. 6 to Final EIR No. 588, that will result in a revision to the landfill's SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will require the following changes to Final EIR No. 588, Section 4.5.2 Project Modifications, page 4-15, first paragraph, last two sentences, as shown in redline/strikeout text below:

"This additional capacity would extend the life of the Olinda Alpha Landfill from its permitted closure date of 2013 to ~~approximately~~ ~~2021~~ December 31, 2036, based on current population projections, daily tonnage, compaction densities, the approved permitted final landfill elevation~~s~~ of 1,415 feet AMSL, use of alternative daily cover, landfill settlement, landfill disposal practices and technologies that maximize space within the landfill, State laws that mandate the diversion of solid waste materials from landfills and a smaller working face necessitating the acceptance of reduced daily tonnage once the landfill begins to reach the latter stages of its permitted buildout design capacity. The proposed project would not result in any increase to either the maximum daily permitted tonnage or the annual average daily tonnage limits for this landfill."

As discussed below, the proposed revision to the landfill SWFP to allow for an update to the landfill closure date from December 31, 2021 to December 31, 2036 is in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.0 Analysis Confirming that an Addendum is the Appropriate CEQA Document for Proposed Project

Included below is an analysis of why an Addendum is the appropriate CEQA documentation for the revised closure date for the landfill. The analysis summarizes the conclusions for each environmental topic analyzed in Final EIR No. 588 and whether there would be a change in the significance conclusion for each environmental topic as a result of the proposed project.

2.1 Aesthetics

Final EIR No. 588 found that the expansion and continued operation of the landfill would result in an unavoidable significant adverse impact to aesthetics, even after the implementation of mitigation measure AS-1 that is included below. Mitigation, which includes landscaping designed to blend the landfill operation in with the native hillsides is ongoing. Landscaping will also continue during the postclosure maintenance period after the landfill is closed. The finding in Final EIR No. 588 that the continued operation and expansion of the landfill would result in an unavoidable significant adverse impact to aesthetics was based on the landfill reaching a final elevation of 1,415 feet AMSL. This final elevation will not change with the proposed project. Final EIR No. 588 also found that the continued operation of the landfill will not result in any significant impacts from the landfill's use of artificial lighting, after the incorporation of mitigation measure AS-2 that is included below. For the proposed project, the landfill will continue to operate from 6 AM to 4 PM, Monday through Saturday. There will be no nighttime landfill disposal operations.

Final EIR No. 588 Aesthetics Mitigation Measures

- (AS-1) The existing Olinda Alpha Landfill Landscape Master Plan (LMP) that was developed in concert with IWMD (i.e., now OCWR) and the City of Brea Citizens Advisory Committee in 1994 to address minimization of interim and permanent visual impacts will be revised to include the proposed vertical and horizontal expansion. The current seed mixes in the LMP will be identified for use on the appropriate areas of the expansion. The revised LMP will execute the original goal of blending the landfill property with the adjacent native open space area. The revised plan will be approved by IWMD and the City of Brea and will be included in the Closure Plan for the site as part of the SWFP and WDR revision application.

  The phased interim landscape plan included as part of the LMP will be revised to continue visual screening of the landfill operations and facilities for the expansion and to assist in blending the manufactured slopes with surrounding open space prior to landfill closure.

- (AS-2) All outdoor lighting, including any construction-related lighting, shall be designed, installed and operated in a manner that ensures that all direct rays from project lighting are contained within the landfill property, and that residences and undeveloped areas that may provide wildlife value are protected from spillover light and glare.

The revision to the landfill closure date will not result in any new or substantially worsened significant impacts to aesthetics when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. OCWR will continue to implement mitigation measures AS-1 and AS-2. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.2 Agriculture & Forestry Resources

Final EIR No. 588 found that the expansion and continued operation of the landfill would not result in any significant impacts to agriculture and forestry resources. There are no agricultural or forestry resources within the landfill property boundary.

There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.3 Air Quality

Final EIR No. 588 for the expansion and continued operation of the Olinda Alpha Landfill found that air quality, both for construction and operational emissions, would result in a significant unavoidable adverse impact, even after the incorporation of mitigation measures AQ-1 and AQ-2, included below. Final EIR No. 588 determined that during the operation of the Olinda Alpha Landfill at a maximum daily permitted tonnage of 8,000 TPD, the landfill would result in 910 lbs./day of carbon monoxide (CO) emissions, 657 lbs./day of Reactive Organic Gases (ROG) emissions, 1,215 lbs./day of nitrogen oxide (NO_x) emissions, 111 lbs./day of sulfur oxide (SO_x) emissions and 114 lbs./day of particulate matter (PM_{10}) emissions.

Addendum No. 5 to Final EIR No. 588 analyzed the potential environmental impacts associated with the Management of High Tonnage Days project, which allows the landfill to accept up to a maximum daily permitted tonnage of 10,000 TPD of solid waste per day for up to 36 days per year that primarily occur on high tonnage days following major holidays. An air quality analysis was completed to determine if the landfill accepting a maximum daily permitted tonnage of 10,000 TPD for up to 36 days per year would result in any new or substantially worsened significant air quality impacts when compared to the air quality impacts included in Final EIR No. 588 for an 8,000 TPD landfill operation. The air quality analysis for the

Management of High Tonnage Days project, included as part of **Appendix B**, found that air quality impacts would not result in any new or substantially worsened significant impacts to air quality. This is because waste hauling vehicle fleets are now equipped with engines that produce less emissions when compared to emissions from waste hauling vehicles using the landfill when Final EIR No. 588 was certified in April 2007. Addendum No. 5 to Final EIR No. 588 for the Management of High Tonnage Days project was approved by the Director of OCWR on March 31, 2014. Thereafter, OCWR applied for a revision to the existing landfill Solid Waste Facility Permit, which was issued by the LEA, acting on behalf of CalRecycle on June 8, 2015.
As part of this Addendum No. 6 to Final EIR No. 588 for the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, an air quality analysis was completed which is **Appendix E**. This air quality analysis shows that the revision to the landfill closure date will not result in any new or significantly worsened significant impacts to air quality, since waste hauling vehicle fleets are now equipped with engines that produce less emissions when compared to emissions from waste hauling vehicles using the landfill when Final EIR No. 588 was certified in April 2007. Over time, it is anticipated that air emissions from the landfill operation will continue to be reduced as more waste hauling vehicles convert from diesel fuel to cleaner burning fuels in compliance with South Coast Air Quality Management District (SCAQMD) Rule 1193. In addition, OC Waste & Recycling will continue to participate in the Carl Moyer Program, replacing existing heavy construction equipment with less polluting heavy construction equipment. The landfill operation continues to be governed by permits issued by the SCAQMD. The SCAQMD will also continue to enforce the terms and conditions contained within these permits.

Odors

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or substantially worsened impacts from odors that were previously analyzed in Final EIR No. 588. Odors will continue to be controlled by using best management practices at the landfill for compacting and covering all waste materials received by the end of the working day. Also, the area of refuse placement is contained to as small an area as practicable as an additional odor control measure. In addition, OCWR will continue to maintain, expand and monitor the landfill gas collection system to prevent odor migration. Odors at the landfill continue to be regulated by both the LEA and SCAQMD.

Final EIR No. 588 Air Quality Mitigation Measures

- (AQ-1) Applicable dust suppression techniques from Rule 403 are summarized below. Additional dust suppression measures in the South Coast Air Quality Management District (SCAQMD) California Environmental Quality Act (CEQA) Air Quality Handbook are also included as part of the project's mitigation. Implementation of these dust suppression techniques will reduce the fugitive dust generation (and thus the PM10 component). Compliance with these rules will reduce impacts on nearby sensitive receptors.

  Applicable Rule 403 measures:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).

- Water active sites at least twice daily. (Locations where grading is to occur will be thoroughly watered prior to earth moving).

- All trucks hauling dirt, sand, soil, or other loose materials are to be covered, or should maintain at least two feet of freeboard in accordance with the requirements of the California Vehicle Code (CVC) section 23114 (freeboard means vertical space between the top of the load and top of the trailer).

- Pave construction access roads at least 100 feet onto the site from the main road.

- Traffic speeds on all unpaved roads shall be reduced to 15 miles per hour or less.

Additional SCAQMD CEQA Air Quality Handbook dust measures:

- Revegetate disturbed areas as quickly as possible.

- All excavating and grading operations shall be suspended when wind speeds (as instantaneous gusts) exceed 25 mph and dust plumes are visible.

- All on-site streets shall be swept once a day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).

- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash trucks and any equipment leaving the site each trip.

- (AQ-2) Dust generated by the construction activities shall be retained on-site and kept to a minimum by following the dust control measures listed below:

  - During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.

  - During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas in the late morning and after work is completed for the day and whenever wind exceeds 15 mph.

  - During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas in the late morning and after work is completed for the day and whenever wind exceeds 15 mph.

- Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation.

- Trucks transporting soil, sand, cut or fill materials, and/or construction debris to or from the site shall be tarped or maintain 6 inches of freeboard from the point of origin.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or substantially worsened significant impacts to air quality when compared to the analysis that was included in Final EIR No. 588 and Addendum No. 5 to Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. OCWR will continue to implement mitigation measures AQ-1 and AQ-2. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588 and Addendum No. 5 to Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.4 Biological Resources

Final EIR No. 588 found that the expansion and continued operation of the landfill would result in an unavoidable significant adverse impact to biological resources, even after the implementation of mitigation measures B-1 and B-2 that are included below.

Final EIR No. 588 Biological Resources Mitigation Measures

- (B-1) Prior to the removal of the 1.3 acres of coast live oak, IWMD shall prepare and submit a Mitigation Monitoring and Reporting Program (MMRP) to the California Department of Fish and Game (CDFG) for review and approval. In accordance with an approved MMRP, IWMD will replace the 1.3 acres of coast live oak woodland at a 1:1 ratio (or as otherwise approved by the CDFG). The location of coast live oak plantings on the landfill will be determined in consultation with CDFG and a qualified ecologist. However, if the ultimate location of these replacement oaks are within the disposal area of the landfill, the RWQCB-SA will need to approve the plan to ensure that the tree root system does not compromise landfill operations and/or closure (final cover) requirements.

OCWR has implemented this mitigation measure by restoring 110 coast live oak trees in Santiago Oaks Regional Park in the City of Orange, as approved by the California Department of Fish and Wildlife (formerly the California Department of Fish and Game or CDFG). OCWR will continue to maintain and monitor the coast live oak trees until they reach their final performance requirements and OCWR obtains sign-off of the mitigation site from CDFW.

- (B-2) Prior to the removal of the 4.0 acres of CSS and the 10.4 acres of cut/slope revegetation, IWMD shall prepare and submit a Coastal Sage Scrub Mitigation Plan (CSSMP), to the CDFG for review and approval. In accordance with an approved CSSMP, the IWMD will replace the 4.0 acres of CSS and the 10.4 acres of cut/slope revegetation, which provide marginally suitable habitat for the California gnatcatcher, at a 1:1 ratio (or as otherwise approved by the CDFG). Guidelines for the CSSMP are:

    - The mitigation areas/sites shall have been evaluated and selected on the basis of their suitability for use as coastal sage scrub revegetation areas. The parameters evaluated shall include but not be limited to soil conditions, slope aspect, proximity to adjacent coastal sage scrub, level of difficulty of site preparation, and ownership status.

    - The mitigation plan shall provide procedures to prepare the soils in the mitigation area, provide detailed seeding/planting mixtures, provide seeding/planting methods and provide any other procedures that will be used for successful revegetation.

    - Maintenance and monitoring goals shall be established.

OCWR implemented this mitigation measure by contracting with the Puente Hills Habitat Preservation Authority (Habitat Authority) to restore approximately 15 acres of coastal sage scrub in south Whittier, on land owned by the Habitat Authority that was authorized for habitat restoration. The Habitat Authority implemented the mitigation project in 2010 and received concurrence from CDFW on November 19, 2015 that the CSS mitigation site had met all of its final performance requirements.

The revision to the landfill closure date will not result in any new or substantially worsened significant impacts to biological resources when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. OCWR will continue to implement mitigation measure B-1 until achieving sign-off from CDFW. Mitigation Measure B-2 has been completed. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.5 Cultural Resources

Final EIR No. 588 found that after the incorporation of mitigation measures C1, C2 and C3 below, the expansion and continued operation of the landfill would not result in any significant impacts to archaeological or paleontological resources. Final EIR No. 588 found that there would be no impacts to historical resources.

- (C-1) The construction bid package, related construction and design plans, and specifications shall require that if buried cultural material is encountered during project construction, the County's construction contractor shall immediately stop work in the area. Work shall be halted until the County can retain a qualified archaeologist, and the nature and significance of the find are determined. If significant archaeological material is found, it shall be salvaged and collected in compliance with all applicable regulations and sent to a designated museum.

- (C-2) If human remains are encountered during project construction, the County's construction contractor shall immediately stop work in the area. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 24 hours of the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

- (C-3) A Paleontological Resources Impact Mitigation Program (PRIMP) will be implemented. The PRIMP shall include, but not be limited to, the following: paleontological monitoring, preparation of any collected specimens to the point of identification, curation of specimens to a museum or similar institution and preparation of a mitigation report documenting any findings.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or substantially worsened significant impacts to cultural resources when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. OCWR will continue to implement mitigation measures C-1, C-2 and C-3. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.6 Energy

The proposed revision to the landfill closure date would not result in any significant impacts caused by the wasteful, inefficient or unnecessary use of energy, or the wasteful use of energy resources. If the revision to the landfill closure date did not occur, and the landfill was forced to close, this could result in the development of new landfills at more distant locations, resulting in increased energy use, specifically for fuel consumption. In addition, the proposed revision to the

landfill closure date will not result in any new significant energy impacts or substantially worsened energy impacts when compared to the landfill operation that existed when Final EIR No. 588 was certified in April 2007. In addition, the revision to the landfill closure date will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion when compared to energy impacts that would have occurred when Final EIR No. 588 was certified in April 2007. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.7 Geology and Soils

Final EIR No. 588 found that the expansion and continued operation of the landfill would not result in any significant impacts to geology and soils after the incorporation of mitigation measures G-1 and G-2 below. The landfill operation continues to be governed by permits issued by the California Regional Water Quality Control Board – Santa Ana Region (RWQCB) and the LEA (with CalRecycle's concurrence). These agencies will also continue to enforce the terms and conditions contained within these permits. The LEA will continue to inspect the landfill every month.

Final EIR No. 588 Geology and Soils Mitigation Measures

- (G-1) Prior to construction of the lateral expansion area, additional geologic data will be obtained and subsequent slope stability analyses will be conducted to verify assumptions made for the stability analysis included in Appendix L in the Final Environmental Impact Report (FEIR).

- (G-2) Geologic mapping will be conducted during construction to identify any changes in geologic structure that may impact the stability analysis conducted for the lateral expansion design.

OCWR has already completed mitigation measures G-1 and G-2 and the 33-acre landfill expansion area is now being filled with refuse. The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or substantially worsened significant impacts to geology and soils when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in

Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.8 Greenhouse Gas Emissions

When Final EIR No. 588 was certified in April 2007, CEQA did not require an analysis of greenhouse gas emissions to be prepared as part of the CEQA documentation for the project. However, Addendum No. 5 to Final EIR No. 588 analyzed the potential environmental impacts associated with the Management of High Tonnage Days project, which allows the landfill to accept a maximum daily permitted tonnage of 10,000 TPD of solid waste per day for up to 36 days per year that primarily occur on high tonnage days following major holidays. A greenhouse gas emissions analysis was completed to determine if the landfill accepting a maximum daily permitted tonnage of 10,000 TPD for up to 36 days per year would result in any new or substantially worsened significant greenhouse gas emissions impacts when compared to the greenhouse gas emissions impacts that would have occurred at the time when Final EIR No. 588 was certified in April 2007 for a maximum landfill daily permitted tonnage of 8,000 TPD. The greenhouse gas emissions analysis for the Management of High Tonnage Days project, included as part of **Appendix B**, found that greenhouse gas emissions impacts would not result in any new or substantially worsened significant impacts from greenhouse gas emissions. This is because waste hauling vehicle fleets are now equipped with engines that produce less emissions when compared to emissions from waste hauling vehicles using the landfill when Final EIR No. 588 was certified in April 2007. Addendum No. 5 to Final EIR No. 588 for the Management of High Tonnage Days project was approved by the Director of OCWR on March 31, 2014. Thereafter, OCWR applied for a revision to the existing landfill Solid Waste Facility Permit, which was issued by the LEA, acting on behalf of CalRecycle on June 8, 2015.

As part of this Addendum No. 6 to Final EIR No. 588 for the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, a greenhouse gas emissions analysis was completed which is **Appendix E**. This greenhouse gas emissions analysis shows that the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or significantly worsened significant impacts from greenhouse gas emissions, since waste hauling vehicle fleets are now equipped with engines that produce less emissions when compared to greenhouse gas emissions from waste hauling vehicles using the landfill when Final EIR No. 588 was certified in April 2007. Over time, it is anticipated that greenhouse gas emissions from the landfill operation will continue to be reduced as more waste hauling vehicles convert from diesel fuel to cleaner burning fuels in compliance with South Coast Air Quality Management District (SCAQMD) Rule 1193. In addition, OC Waste & Recycling will continue to participate in the Carl Moyer Program, replacing existing heavy construction equipment with less polluting heavy construction equipment. The landfill operation continues to be governed by permits issued by the SCAQMD. The SCAQMD will also continue to enforce the terms and conditions contained within these permits.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or substantially worsened impacts to greenhouse gas emissions when compared to greenhouse gas emissions that would

have been generated by the landfill operation when Final EIR No. 588 was certified in April 2007 or the greenhouse gas emissions analysis included in Addendum No. 5 to Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Addendum No. 5 to Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.9 Hazards and Hazardous Materials

Final EIR No. 588 found that the expansion and continued operation of the landfill would not result in any significant impacts to hazards and hazardous materials. The landfill will continue to receive a small volume of household hazardous waste materials with incoming refuse. This is controlled by the landfill operator's hazardous waste load checking program at the landfill and through screening programs at the waste haulers' material recovery facilities that process the solid waste to remove recyclables before delivery of residual waste materials to the landfill. The LEA will continue to inspect the landfill every month and will continue to inspect OCWR's load checking program for hazardous wastes.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or substantially worsened impacts from hazards and hazardous materials when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.10 Hydrogeology and Water Quality

Final EIR No. 588 found that the expansion and continued operation of the landfill would not result in any significant impacts to hydrogeology and water quality after the incorporation of mitigation measures HW-1, HW-2 and HW-3 that are included below. The landfill operation continues to be governed by permits issued by the RWQCB and LEA (with CalRecycle's concurrence). These agencies will continue to enforce the terms and conditions contained within these permits. The LEA will continue to inspect the landfill every month.

- (HW-1) A composite liner or an alternative to the prescriptive composite liner and leachate collection and recovery system (LCRS) will be placed in the lateral expansion area to intercept and collect leachate for disposal off-site or use as dust control, as

approved by the Regional Water Quality Control Board-Santa Ana (RWQCB-SA). A subdrain system will be installed, as necessary to intercept seeps below the liner. The prescriptive or alternative liner, LCRS and subdrain will be approved by the RWQCB-SA and comply with federal and state requirements (27 CCR).

- (HW-2) The site will continue to comply with the site's Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program requirements imposed by the RWQCB-SA for the protection of water quality.

- (HW-3) The Corrective Action System in place at the landfill will continue operating during the extended landfill operations if detections of volatile organic compounds (VOCs) in groundwater continue.

The revision to the landfill closure date will not result in any new or substantially worsened significant impacts to hydrogeology and water quality when compared to the analysis that was included in Final EIR No. 588. Mitigation measure HW-1 has been completed and OCWR will continue to implement mitigation measures HW-2 and HW-3. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.11 Surface Water Hydrology

Final EIR No. 588 found that the expansion and continued operation of the landfill would not result in any significant impacts to hydrology and water quality after the incorporation of mitigation measures H-1, H-2, H-3, H-4, H-5 and H-6. The landfill operation continues to be governed by permits issued by the RWQCB and LEA (with CalRecycle's concurrence). These agencies will continue to enforce the terms and conditions contained within these permits. The LEA will continue to inspect the landfill every month.

- (H-1) As part of a Joint Technical Document (JTD) to be prepared by IWMD in support of a revised Solid Waste Facility Permit (SWFP) and WDRs for the proposed expansion, the IWMD shall present the assumptions, methods and calculations used to calculate the potential flow quantities for run-on, run-off and sediment content of storm water flow used in sizing drainage and sediment control facilities for Olinda Alpha Landfill in conformance with 27 CCR regulations.

- (H-2) As part of the JTD to be prepared by IWMD in support of the revised SWFP and WDRs for the expansion, the IWMD shall include surface drainage plans for Olinda Alpha Landfill expansion final grading plans, including any berms, down drain systems, perimeter drainage channel improvements and the location of off-site discharge points for run-off water in compliance with 27 CCR regulations.

- (H-3) Diversion and drainage facilities shall be evaluated, designed, constructed and operated to accommodate the anticipated volume of precipitation and peak flows from surface run-off under the precipitation conditions specified in Title 27 of the CCR. Drainage facilities for the landfill expansion shall be designed to prevent washout of the waste management unit during a 100-year storm event.

- (H-4) The landfill (including the expansion area) will continue to operate under a National Pollutant Discharge Elimination System (NPDES) Permit to discharge storm flows. The criteria and restrictions of the NPDES permit and the Storm Water Pollution Protection Plan (SWPPP) and Best Management Practices (BMPs) that accompany the NPDES Permit will be adhered to.

- (H-5) Positive drainage will be ensured in the expansion area by maintaining a two to three percent slope on all landfill deck surfaces.

- (H-6) During all landfilling operations in the expansion area, sediment and erosion control plans will continue to be prepared and implemented on an annual basis to reduce sediment and erosion control on the landfill site.

The revision to the landfill closure date will not result in any new or substantially worsened significant impacts to surface water hydrology when compared to the analysis that was included in Final EIR No. 588. Mitigation measures H-1, H-2 and H-3 have been completed. OCWR will continue to implement mitigation measures H-4, H-5 and H-6. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.12 Land Use and Planning

Final EIR No. 588 found that the expansion and continued operation of the landfill would result in an unavoidable significant adverse impact to land use and planning, even after the incorporation of mitigation measure LU-1, which is included below.

- (LU-1) Prior to acquiring revised landfill permits and finalization of design plans for the project, the County of Orange and the City of Brea will renegotiate the details of the Memorandum of Understanding (MOU) to allow the disposal of municipal solid waste (MSW) over a longer period of time. Under the proposed project, closure would be extended to approximately 2021 based on increasing the site's air space capacity and increased operational efficiencies, current population projections and existing disposal technologies.

In accordance with mitigation measure LU-1, on July 14, 2009, the County and City of Brea entered into a Cooperative Agreement that provided financial compensation to the City for the expansion and continued operation of the landfill until the landfill reaches its design buildout final elevation of 1,415 feet AMSL. Funding provided to the City by the County in the form of lumpsum payments and per/ton Host Fees have provided over $30 million to the City for all costs incurred by the City related to the operation of the landfill and are intended to assist the City in paying for community amenities including but not limited to environmental and transportation improvements, open space acquisition, parks and trails development, equestrian and recreational facilities.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any new or substantially worsened significant impacts to land use and planning when compared to the analysis that was included in Final EIR No. 588. The landfill has been in continuous operation since 1960 and the County General Plan land use designation for the landfill operation remains 4LS (Public Facilities; Landfill Site). OCWR will continue to implement mitigation measure LU-1 with the City receiving a per ton fee for all solid waste disposed in the landfill until the permitted final elevation of 1,415 feet AMSL has been reached. As stated in the Cooperative Agreement, Section B.7(b), "closure of the OA Landfill shall take place when the landfill reaches an elevation of 1,415 feet above mean sea level (AMSL) and it will be done in conformance with the Federal and State standards in effect at the time of closure."

There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.13 Mineral Resources

Final EIR No. 588 found that the expansion and continued operation of the landfill would not result in any significant impacts to mineral resources. There are no mineral resources located within the landfill property boundary and the boundary will not change through the revision of the anticipated closure date.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or substantially worsened impacts to mineral resources when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for

this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.14 Noise and Vibration

Final EIR No. 588 found that the expansion and continued operation of the landfill would not result in any significant impacts from vibration. However, Final EIR No. 588 did find that the expansion and continued operation of the landfill would result in an unavoidable significant adverse impact to noise, for ongoing landfill operational noise, even after the implementation of mitigation measures N-1 through N-5 included below.

Addendum No. 5 to Final EIR No. 588 analyzed the potential environmental impacts associated with the Management of High Tonnage Days project, which allows the landfill to accept a maximum daily permitted tonnage of 10,000 TPD of solid waste per day for up to 36 days per year that primarily occur on high tonnage days following major holidays. A noise analysis was completed to determine if the landfill accepting a maximum daily permitted tonnage of 10,000 TPD for up to 36 days per year would result in any new or substantially worsened significant noise impacts when compared to the noise impacts included in Final EIR No. 588 for an 8,000 TPD maximum daily permitted tonnage landfill operation. The noise analysis for the Management of High Tonnage Days project, included as part of **Appendix B**, found that there would be no new or substantially worsened significant impacts to noise as a result of the Management of High Tonnage Days project. The noise analysis also determined that noise from waste hauling vehicles would be below City of Brea Noise Ordinance standards for residential uses located near the landfill access roads (i.e., Valencia Avenue and Imperial Highway). This is because waste hauling fleets are now equipped with engines that produce less noise when compared to engines of waste hauling vehicles using the landfill when Final EIR No. 588 was certified in April 2007. This is also due to heavy waste hauling vehicles using braking systems that produce less noise when compared to braking systems commonly used in April 2007. Addendum No. 5 to Final EIR No. 588 for the Management of High Tonnage Days project was approved by the Director of OCWR on March 31, 2014. Thereafter, OCWR applied for a revision to the existing landfill Solid Waste Facility Permit, which was issued by the LEA, acting on behalf of CalRecycle on June 8, 2015.

As part of this Addendum No. 6 to Final EIR No. 588 for the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, a noise analysis was completed which is **Appendix F**. This noise analysis shows that the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or significantly worsened significant impacts to noise. The noise analysis also determined that noise from waste hauling vehicles would be below City of Brea Noise Ordinance standards for residential uses located near the landfill access roads (i.e., Valencia Avenue and Imperial Highway). This is because waste hauling fleets are now equipped with engines that produce less noise when compared to engines of waste hauling vehicles using the landfill when Final EIR No. 588 was certified in April 2007. This is also due to heavy waste hauling vehicles using braking systems that produce less noise when compared to braking systems commonly used in April 2007.

Final EIR No. 588 Noise Mitigation Measures

- (N-1) During all project site excavation and grading, the project contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.

- (N-2) The project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the active construction areas.

- (N-3) The construction contractor shall locate equipment staging in areas to result in the greatest distance between construction related noise sources and noise sensitive receptors nearest the active construction areas during all project construction.

- (N-4) The construction contractor shall restrict all construction-related activities that would result in high noise levels between the hours of 8:00 PM and 7:00 AM on weekdays, including Saturday, or at any time on Sunday or a federal holiday.

- (N-5) For residential units on Valencia Avenue north of Carbon Canyon Road which are approved prior to the approval of an expansion at Olinda Alpha Landfill, which are constructed and occupied before 2013 and which would be impacted by 65 dBA CNEL or higher traffic noise, the County of Orange IWMD will contribute a fair share to a road noise reduction program for those residences, if such a program is implemented by the City of Brea. This program could potentially implement a variety of road noise reduction measures, which may include reduction in road speeds on the segment of Valencia Avenue north of Carbon Canyon Road, construction of sound walls adjacent to the affected residences and/or installation of rubberized asphalt concrete on Valencia Avenue north of Carbon Canyon Road.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any new or substantially worsened significant impacts to noise when compared to the analysis that was included in Final EIR No. 588 and Addendum No. 5 to Final EIR No. 588. Vibration impacts will continue to remain less than significant. OCWR will continue to implement mitigation measures N-1 through N-4. For mitigation measure N-5, the County provided funding for fair-share noise mitigation as part of the larger funding associated with the July 2009 Cooperative Agreement between the County and the City. The City will have the ability to implement mitigation measure N-5 in the future should noise from waste hauling vehicles exceed 65 dBA CNEL at residences located along Valencia Avenue north of Carbon Canyon Road. The noise analyses included as part of Final EIR No. 588, Addendum No. 5 to Final EIR No. 588 for the Management of High Tonnage Days project and the revision to the landfill closure date, all show noise levels from waste hauling vehicles are below the 65 dBA CNEL level when measured at homes located along Valencia Avenue, north of Carbon Canyon Road.

There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in

Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588 and Addendum No. 5 to Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.15 Population and Housing

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any new or substantially worsened impacts to population and housing when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.16 Public Services

The revision to the landfill SWFP to allow for an update to the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any new or substantially worsened impacts to public services when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.17 Recreation

Final EIR No. 588 found that the expansion of the landfill would result in an unavoidable significant adverse impact to recreation, since the expansion and continued operation of the landfill would delay the potential use of the landfill property as a County regional park. In 2009, the County and City of Brea entered into a Cooperative Agreement (see **Appendix A**) that provided financial compensation to the City for the expansion and continued operation of the landfill until the landfill reaches its permitted design buildout elevation of 1,415 feet AMSL. This funding can be utilized by the City for "community amenities including but not limited to environmental and transportation improvements, open space acquisition, parks and trails development, equestrian and recreational facilities."

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any new or substantially worsened significant impacts to recreation when compared to the analysis that was included in Final EIR No. 588. The revision to the landfill closure date will not result in the construction of new residential development resulting in an increased need for recreational facilities or resources, nor will the continued operation of the landfill result in any direct physical impacts to any existing or planned recreational facilities or resources.

There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.18 Transportation and Circulation

Final EIR No. 588 found that the after the incorporation of mitigation measures T-1 and T2 below, the expansion and continued operation of the landfill would not result in any significant impacts to transportation and circulation.

Addendum No. 5 to Final EIR No. 588 analyzed the potential environmental impacts associated with the Management of High Tonnage Days project, which allows the landfill to accept a maximum daily permitted tonnage of 10,000 TPD of solid waste per day for up to 36 days per year that primarily occur on high tonnage days following major holidays. A traffic analysis was completed to determine if the landfill accepting up to 10,000 TPD for up to 36 days per year would result in any new or substantially worsened significant traffic impacts when compared to the traffic impacts included in Final EIR No. 588 for an 8,000 TPD landfill operation. The traffic analysis, included as part of **Appendix B**, found that the Management of High Tonnage Days project would not result in any new or substantially worsened significant impacts to traffic, when compared to the traffic impacts from Final EIR No. 588. In addition, the landfill has received significantly less daily traffic than was originally projected by Final EIR No. 588. **Appendix G** shows that the landfill has received an annual average daily traffic volume of approximately 677 vehicles per day from 2008-2019, which is well below the 1,012 vehicle per day average, projected to be received at the landfill, included in Final EIR No. 588. Even with the implementation of the Management of High Tonnage Days Project, beginning in 2015, the landfill has only averaged 858 vehicles per day from 2015-2019, as shown in **Appendix H**. Addendum No. 5 to Final EIR No. 588 was approved by the Director of OCWR on March 31, 2014. OCWR then applied for a revision to the existing landfill Solid Waste Facility Permit, which was issued by the LEA, acting on behalf of CalRecycle on June 8, 2015.

As part of this Addendum No. 6 to Final EIR No. 588 for the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, a

traffic analysis was completed, which is **Appendix I**. This traffic analysis shows that the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or significantly worsened significant impacts to transportation and circulation.

Final EIR No. 588 Transportation and Circulation mitigation measures:

- (T-1) Imperial Highway at Valencia Avenue: IWMD will contribute a 9.2 percent fair share of the cost to modify the southbound Valencia Avenue approach at Imperial Highway. The fair share allocation is a standard County RDMD (i.e., now called OC Public Works) guideline for intersections operating at a Level of Service (LOS) E without a project and LOS F with a project as the LOS is unacceptable. Under both scenarios, IWMD will contribute its fair share to the incremental impact to the southbound Valencia Avenue approach at Imperial Highway which would change the LOS E to LOS F (Refer to Appendix F-9 in the FEIR for supporting calculation sheets). The proposed modifications included one additional southbound left-turn lane and reconfiguration of the rest of the southbound lanes (i.e., one through lane and one right-turn lane) to one through lane and one shared through/right-turn lane. This was accomplished with restriping only and with no additional street widening.

  The proposed modifications include one additional southbound left turn lane and reconfiguration of the rest of the southbound lanes (i.e., one through and one right turn lane) to one through lane and one optional through/right lane. This measure can be accomplished with re-striping only and with no additional street widening.

  This improvement will result in an intersection capacity utilization (ICU) of 0.836 (LOS D) with mitigation compared to an ICU of 0.981 (LOS E) without mitigation.

- (T-2) Imperial Highway and Kraemer Boulevard: IWMD will contribute a 100 percent fair share to the cost to modify the eastbound Imperial Highway approach at Kraemer Boulevard. The 100 percent fair share allocation is a standard County RDMD guideline for intersections operating at a LOS D without a project (an unacceptable LOS) and LOS E with a project (an unacceptable LOS). Since the projected traffic associated with the Olinda Alpha Landfill expansion project on its own, would cause the LOS D at the Imperial Highway and Kraemer Boulevard intersection to operate at LOS E, IWMD will contribute 100 percent of the cost to improve the LOS to an acceptable LOS D.

  The proposed modifications are to provide an eastbound right turn only lane. This mitigation measure requires widening on the south side, relocation of street light poles and other street furniture.

The revision to the landfill closure date will not result in any new or substantially worsened significant impacts to transportation and circulation when compared to the analysis that was included in Final EIR No. 588 and Addendum No. 5 to Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table**

1. For mitigation measures T-1 and T-2, the County provided the required fair-share traffic mitigation funds as part of the larger funding associated with the July 2009 Cooperative Agreement between the County and the City. Traffic mitigation measures T-1 and T-2 were then completed by the City. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588 and Addendum No. 5 to Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

Senate Bill 743, approved in 2013 and incorporated into the CEQA Guidelines in 2018, better aligns CEQA with the State's climate and air quality goals by requiring the preparation of a vehicle miles traveled (VMT) analysis, as part of the CEQA transportation analysis, for specific types of new proposed development projects. Public services and facilities that support community health, safety or welfare are screened from a VMT analysis. Such facilities include fire stations, police/sheriff stations, jails, community centers, refuse stations and landfills. These facilities are already part of the community, and as a public service, the VMT is accounted for in the existing regional average. In addition, the Governor's Office of Planning and Research *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) makes it clear that VMT is measured for "automobiles" which are "on-road passenger vehicles, specifically cars and light trucks." As such, the refuse disposal vehicles that visit the Olinda Alpha Landfill, which are large trucks, would therefore be screened from the requirements of a VMT analysis. In addition, for the update of the landfill closure date, no significant increase in vehicle miles traveled are anticipated, since there are no changes being proposed to the maximum daily permitted tonnage for the landfill, and as a result daily landfill traffic is anticipated to be very similar to existing conditions. In addition, under Public Resources Code section 21166, VMT analysis is not required for this addendum. (See, e.g., CREED v. San Diego (2011) 196 Cal.App.4th 515; Concerned Dublin Citizens v. City of Dublin (2013) 214 Cal.App.4th 1301, 1320.)

On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.19 Tribal Cultural Resources

When Final EIR No. 588 was certified in April 2007, an analysis of tribal cultural resources was not required by CEQA. The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in the development of any previously undeveloped areas at the landfill (i.e., all areas have been previously disturbed). Refuse will continue to be placed on top of existing landfill development areas. OCWR will continue to implement cultural resources mitigation measures C1 and C2 discussed previously in this document. The revision to the landfill SWFP to allow for an update of the

landfill closure date from December 31, 2021 to December 31, 2036, will not result in any significant impacts to tribal cultural resources.

2.20 Utilities and Service Systems

Final EIR No. 588 found that the expansion and continued operation of the landfill would not result in any significant impacts to utilities and service systems. The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or significantly worsened impacts to utilities and service systems as the landfill operation will continue to be served by the same utility and service system providers. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.21 Wildfire

When Final EIR No. 588 was certified in April 2007, wildfire was not an environmental topic that was required to be analyzed by CEQA. The continued operation of the landfill will not result in any significant wildfire impacts. In fact, the landfill acts as a large fire break since almost the entire landfill site is disturbed and vegetation is removed prior to landfilling. The continued operation of the landfill will therefore not exacerbate fire risks or expose people or structures to significant risks, including post-fire downstream flooding, mudslides or landslides. In addition, the continued operation of the landfill will not substantially impair or interfere with an adopted emergency response plan or emergency evacuation plan. The Orange County Fire Authority (OCFA) continues to inspect the landfill site on a periodic basis.

There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any new or substantially worsened impacts when compared to impacts that would have occurred when Final EIR No. 588 was certified in April 2007. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.22 Growth Inducing Impacts

Growth inducing impacts are generally associated with the major extension of local infrastructure improvements such as water, sewer, natural gas, electrical lines or roads into undeveloped areas that previously did not have these improvements. These types of major infrastructure improvements could result in significant growth inducing impacts. Final EIR No.

588 found that the expansion and continued operation of the landfill would not result in any significant growth inducing impacts. While the project did allow for the expansion and continued operation of the landfill, the landfill was already a major operational solid waste landfill when Final EIR No. 588 was certified in April 2007 (i.e., the Olinda Alpha Landfill has been in continuous operation since 1960) and did not result in the development of a new solid waste landfill.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or substantially worsened growth inducement impacts when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.23 Cumulative Impacts

Section 15130(a) of the CEQA Guidelines states that an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065(a)(3). Section 15065(a)(3) defines cumulatively considerable as the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Section 15130(a) further states that where a Lead Agency is examining a project with an incremental effect that is not cumulative considerable, a Lead Agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

Section 15130(a)(3) states that an EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The Lead Agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.
In compliance with Section 15130(b)(1)(B), the cumulative impacts analysis included in Final EIR No. 588 included a summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reductions of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan.

In compliance with Section 15130(b)(1)(B), Final EIR No. 588 utilized data and analysis included in the City of Brea General Plan to analyze the potential for significant cumulative

impacts associated with the expansion and continued operation of the landfill in combination with related projects. In addition, the Tonner Hills Planned Community, approved but not yet constructed at the time Final EIR 588 was certified in April 2007, was also included in the Final EIR No. 588 cumulative impacts analysis due to its close proximity to the landfill operation and because this was a new, large development project. The Tonner Hills Planned Community comprises 790 acres and includes 914 dwelling units, open space, mixed commercial uses and oil extraction.

The cumulative impacts analysis included in Final EIR No. 588 analyzed the potential cumulative impacts to Land Use and Planning; Geology and Soils; Hydrogeology and Water Quality; Surface Water Hydrology; Transportation and Circulation; Air Quality; Noise and Vibration; Aesthetics; Cultural and Scientific Resources; Hazards; Public Services and Biological Resources. The analysis determined that the expansion and continued operation of the landfill, in combination with related projects, even with the implementation of mitigation measures that would be required for each individual project, would still result in significant cumulative impacts to air quality, since the landfill and related projects are located in a Federal non-attainment air district.

Final EIR No. 588 disclosed and analyzed the cumulative impacts resulting from then existing or proposed (future) residential neighborhoods located in Brea, located in close proximity to the landfill. EIRs certified for future developments that post-dated the certification of Final EIR No. 588, located either near the landfill or along the landfill access roads (i.e., Imperial Highway and Valencia Avenue) analyzed the landfill operation as an existing solid waste landfill operation for purposes of the cumulative impacts analysis for those projects.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, in order to utilize all available disposal capacity at the landfill due to less tonnage received than what was originally projected in Final EIR No. 588, does not invalidate the cumulative impacts analyses included in Final EIR No. 588. EIR No. 588 analyzed the cumulative impacts of operating the landfill until it reached its permitted capacity elevation of 1,415 feet AMSL. The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, does not create any new significant cumulative impacts nor would it result in the substantial worsening of those significant cumulative impacts already analyzed in Final EIR No. 588.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any new or substantially worsened cumulative impacts when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

2.24 Irretrievable and Irreversible Commitment of Resources

Final EIR No. 588 found that the expansion and continued operation of the landfill would result in an irretrievable commitment of resources such as gasoline, diesel fuel and electricity for the operation of construction equipment such as bulldozers, graders, trucks, dump trucks and generators. Because these types of resources are anticipated to be in adequate supply into the foreseeable future, Final EIR No. 588 did not consider these impacts to be significant. The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any change to this significance conclusion as the landfill operation is substantially the same as the landfill operation that was analyzed in Final EIR No. 588, and these resources are still in adequate supply.

The revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036 will not result in any new or substantially worsened impacts for the irretrievable and Irreversible Commitment of Resources when compared to the analysis that was included in Final EIR No. 588. There are no changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity, as shown in Comparison **Table 1**. On the basis of substantial evidence in light of the whole record, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

3.0 Basis for Addendum

The proposed project will result in the revision to the Olinda Alpha Landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036. This update of the landfill closure date will not result in any increases to the following: (1) volume of accepted solid waste, (2) development footprint, (3) design capacity, (4) the slopes of the ultimate fill grading plans, (5) permitted depth of waste or (6) the landfill final elevations as analyzed in Final EIR No. 588. The proposed project will not result in any major changes to the existing landfill operation, rather the landfill is taking longer to fill up than originally anticipated. The proposed project will not result in the creation of any new significant environmental impacts that were not previously analyzed in Final EIR No. 588 or a substantial worsening of significant environmental impacts that were previously analyzed in Final EIR No. 588. The proposed project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a Subsequent EIR is not required.

On the basis of substantial evidence in light of the whole record, and as discussed in the environmental analysis included above, the revision to the landfill SWFP to allow for an update of the landfill closure date from December 31, 2021 to December 31, 2036, will not result in any changes to the significance conclusions contained in Final EIR No. 588 or result in a substantial increase in the severity of the significant environmental impacts previously identified in Final EIR No. 588; therefore, in compliance with Section 15162 and 15164 of the CEQA Guidelines, the preparation of a Subsequent EIR is not required.

4.0 Submitting Comments

Please submit any comments on this Addendum to the following:

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