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COUNTY OF ORANGE
OC Waste&Recycling
Our Community. Our Commitment.

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FROM: Tom Koutroulis, OC Waste & Recycling Director

SUBJECT: Addendum No. 10 to Final EIR No. 588 (SCH #2004011055) Regional Landfill Options for Orange County (RELOOC) Final Closure and Post Closure Maintenance Plan (FCPCMP) — (OC Waste & Recycling Log #737)

## I. Nature of Project

An addendum to FEIR 588 for the FCPCMP has been prepared, as described in Addendum No. 10 to FEIR 588 (CEQA Log # 737, SCH #2004011055). The proposed project involves the implementation of the FCPCMP at OAL. No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed.

Specifically, this Addendum evaluates the implementation of the Final Closure and Post-Closure Maintenance Plan (FCPCMP) for Olinda Alpha Landfill (OAL). Specifically, this Addendum evaluates the full landfill closure sequence, including cessation of waste disposal and substantial decrease of overall facility tonnage relative to the baseline conditions, an anticipated post-closure settlement period of approximately five years, delivery of final cover materials, implementation of final closure construction (including temporary increases in construction equipment and truck traffic), and long-term post-closure maintenance, all of which were contemplated and analyzed as part of the landfill closure scenario evaluated in Final EIR 588. The FCPCMP provides for final landfill closure, installation of an engineered cover system, long-term maintenance of stormwater and landfill gas systems, and continuation of existing material recovery (MR) activities and composting operations. MR activities would either be tied into landfill operations or a separate Solid Waste Facility Permit (SWFP) to be obtained from the appropriate regulatory agencies. The FCPCMP is being prepared in order to establish the basis for the proper level of funding to perform final closure and provide post-closure maintenance for the OAL in perpetuity, or for as long as required by applicable regulatory agencies in an environmentally sound manner. The project remains within the previously approved landfill footprint and does not increase permitted tonnage, or total disposal capacity.

While the FCPCMP establishes the regulatory framework for landfill closure and long-term post-closure care, this Addendum evaluates not only approval of the FCPCMP, but also implementation of the final closure construction activities described therein. Final closure construction includes placement of the engineered or evapotranspirative (ET) final cover system, slope regrading, drainage improvements, access-road stabilization, and revegetation activities necessary to achieve regulatory closure in accordance with Title 27.

Consistent with Title 27 requirements and the approved landfill operating framework, final closure construction would not commence immediately upon cessation of waste disposal

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activities. Following landfill closure, an initial settlement period of approximately five (5) years is anticipated prior to initiation of final closure construction. This interim period allows for initial waste settlement to occur thereby reducing settlement after implementing closure construction.

Final cover materials would be delivered to the landfill in advance of and during final closure construction activities. Upon commencement of final closure construction after the settlement period, temporary increases in construction-related traffic, heavy equipment use, and on-site activity would occur, including earthmoving equipment, material delivery trucks, and construction support vehicles. These activities are temporary in nature, limited in duration, and associated solely with implementation of final closure construction. Such activities were contemplated and analyzed as part of the landfill closure scenario evaluated in Final EIR 588 and subsequent Addenda.

Temporary stockpiling of soil and final cover materials may be required to facilitate efficient implementation of final closure construction. There are no regulatory constraints imposed by CalRecycle that prohibit temporary stockpiles associated with closure construction from being placed above the permitted maximum elevation identified in the SWFP, provided such stockpiles are temporary, do not consist of waste, and are removed upon completion of closure construction activities. A small stockpile for post-closure maintenance activities may be kept after closure construction is completed. Temporary stockpiles would be managed in accordance with applicable regulatory requirements and would not increase permitted disposal capacity, alter the approved landfill footprint, or modify the final permitted landfill elevation.

As discussed in Addendum No. 10 to FEIR 588, an addendum is the appropriate CEQA document for the proposed project as implementation of the proposed project will not result in any new significant environmental impacts that were not previously analyzed in FEIR 588, nor will the proposed project result in a substantial worsening of any significant environmental impacts that were previously analyzed in FEIR 588.

## II. AUTHORITY FOR ADMINISTRATIVE ACTION

The Director of OC Waste & Recycling, pursuant to the authority granted in OCCO Sections 43-104, 4-3-126, 4-3-137, and the Board adopted CEQA Procedures Manual (October 2020) Section Ill.E.8.e, takes the following administrative actions:

## III. CEQA APPROVAL

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.

(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.

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(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 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.

Basis for Addendum

The changes and additions to FEIR 588 from the proposed project will include implementation of the Final Closure and Post-Closure Maintenance Plan (FCPCMP) for Olinda Alpha Landfill. No expansion to the landfill property or change to the landfill's waste acceptance tonnage will occur as a result of implementation of the proposed project. The proposed project includes all the previously disturbed land on the OAL Landfill property. The proposed project will not result in the creation of any new significant environmental impacts that were not previously analyzed in FEIR 588 or a substantial worsening of significant environmental impacts that were previously analyzed in FEIR 588.

On the basis of substantial evidence in light of the whole record, there are no changes to the significance conclusions contained in FEIR 588 (CEQA Log # 737, SCH# 2004011055) or result in a substantial increase in the severity of the significant environmental impacts previously identified in FEIR 588. Therefore, in compliance with Sections 15162 and 15164 of the CEQA Guidelines, the preparation of a Subsequent EIR is not required. No new environmental conditions or circumstances have occurred that would make the analysis included within FEIR 588 for the project invalid, and all applicable adopted mitigation measures remain enforceable.

## IV. Certification

I hereby certify that the subject project is approved.

Date: 07/01/2026

DocuSigned by:
Tom Koutroulis
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Director, OC Waste & Recycling