Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

Addendum No. 10 to Certified Final EIR 588 Regional Landfill Options for Orange County Strategic Plan (RELOOC) for Olinda Alpha Landfill – Final Closure and Post Closure Maintenance Plan (FCPCMP)

CEQA Lead Agency:
County of Orange
OC Waste & Recycling
Attn: Leila Barker, CEQA Manager
601 N. Ross Street, 5th Floor
Santa Ana, CA 92701

June 2026

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

TABLE OF CONTENTS

1.0 Introduction
1.1 Project Background and Location……..…....5
1.2 Proposed Project (FCPCMP)…….....…6
1.3 Existing CEQA Documents…….…...8
1.4 Proposed CEQA Document ……..9
1.5 Other Relevant Documents ……..…..…....10
1.6 Standards for Preparing an Addendum ……..…..…10
1.7 Proposed Addendum No. 10 to Final EIR 588 - Changes to Final EIR 588……..…11

2.0 Analysis Confirming that an Addendum Is the Appropriate CEQA Document for the Proposed Project ……14
2.1 Aesthetics……..…...15
2.2 Agriculture and Forestry Resources…….....16
2.3 Air Quality…….…...17
2.4 Biological Resources…….…...19
2.5 Cultural Resources……...20
2.6 Energy……..…21
2.7 Geology and Soils…….....22
2.8 Greenhouse Gas Emissions……..23
2.9 Hazards and Hazardous Materials……...…25
2.10 Hydrology and Water Quality…….……26
2.11 Surface Water Hydrology……...…28
2.12 Land Use and Planning…….…..…30
2.13 Mineral Resources…….……32
2.14 Noise and Vibration…….……...32
2.15 Population and Housing…….……34
2.16 Public Services……...…34
2.17 Recreation……..35
2.18 Transportation and Circulation…….……..36
2.19 Tribal Cultural Resources…….……..38
2.20 Utilities and Service Systems…….…....39
2.21 Wildfire / Wildland Fire Hazard…….……....40
2.22 Growth-Inducing Impacts…….……..42
2.23 Cumulative Impacts…….……...42
2.24 Irreversible and Irretrievable Commitments of Resources……..……43
2.25 Basis for Addendum…….……..44

3.0 Determination under CEQA Guidelines §15162–15164…….....45

4.0 Mitigation Monitoring and Reporting Program (MMRP) Summary ……..…46

5.0 Submitting Comments ……...……...46

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

List of Figures

Figure 1: Olinda Alpha Landfill (OAL) Vicinity Map
Figure 2: Aerial View of Project Site
Figure 3: Current and Proposed Rendering for Site Closure

List of Appendices

Appendix A – 2024 City of Brea Cooperative Agreement
The July 17, 2024 City of Brea and OC Waste & Recycling Amended Cooperative Agreement (Original dated July 14, 2009)

Appendix B – Addendum No. 5 to Final EIR 588
Provides documentation of prior analysis related to operational refinements, greenhouse gas evaluation, and continued landfill operations under the previously approved footprint.

Appendix C – Addendum No. 6 to Final EIR 588
Documents the update to the landfill's closure date and includes discussion of Tribal Cultural Resources and continued hazard and vegetation-management measures consistent with CEQA guideline updates.

Appendix D – Mitigated Negative Declaration (MND) for the Valencia Greenery Facility
Includes the adopted MND and supporting materials for the continued operation of the Valencia Greenery composting facility located within the Olinda Alpha Landfill property.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

ADDENDUM NO. 10 TO FINAL ENVIRONMENTAL IMPACT REPORT (EIR) 588 FOR THE OLINDA ALPHA LANDFILL FINAL CLOSURE AND POST CLOSURE MAINTENANCE PLAN FCPCMP (FCPCMP)

Prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines §15162 and §15164

State Clearinghouse No.: 2004011055
Lead Agency: County of Orange / OC Waste & Recycling

Project Location:
Olinda Alpha Landfill (OAL)
1942 North Valencia Avenue
City of Brea, Orange County, California

Project Description: This Addendum evaluates the implementation of the Final Closure and Post-Closure Maintenance Plan (FCPCMP) for 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.

Purpose of this Document: Proposed Addendum No. 10 to Final EIR 588 has been prepared pursuant to §15164 of the State CEQA Guidelines to document that the proposed FCPCMP would not result in new significant environmental effects or substantially increase the severity of previously identified effects. The analysis concludes that a subsequent or supplemental EIR is not required.

Prepared by: OC Waste & Recycling, CEQA & Habitat Section

Attn: Leila Barker, CEQA and Habitat Program Manager
601 N. Ross Street, 5th Floor
Santa Ana, CA 92701
Date: June 2026

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

Proposed Project: Addendum No. 10 to Final EIR 588 (SCH #2004011055) Regional Landfill Options for Orange County Strategic Plan (RELOOC) Olinda Alpha Landfill – FCPCMP (OC Waste & Recycling Log #737; SCH #2004011055)

1.0 INTRODUCTION

1.1 Project Background and Location

The Olinda Alpha Landfill (landfill or OAL) is a Class III municipal solid waste landfill owned by the County of Orange (County) and operated by OC Waste & Recycling. The landfill site is in unincorporated Orange County, north of the City of Brea. The specific address of the landfill is 1942 N. Valencia Avenue. The location of the landfill is shown in **Figure 1**.

Final EIR 588 was prepared as a Master EIR under the Regional Landfill Options for Orange County (RELOOC) Strategic Plan, a regional planning framework adopted at the time to evaluate long-term landfill capacity and operational options within Orange County. The RELOOC Plan has since been implemented through existing operational practices and regulatory requirements.

Final EIR 588 was certified by the Orange County Board of Supervisors in 2007, as the Master EIR for the continued operation and expansion of OAL. EIR 588 analyzed landfill operations, capacity, and environmental impacts through closure, projected at that time to occur in 2021. Since certification, the County has prepared nine (9) Addenda addressing operational updates, including revisions to the closure year.

The current Solid Water Facility Plan (SWFP) for the landfill allows the landfill 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 six major holidays). The landfill is now approaching its final years of active operation. In accordance with California Code of Regulations, Title 27 (Title 27), the County has prepared a Final Closure Post Closure Maintenance Plan (FCPCMP) to ensure compliance with state and federal requirements for landfill closure, final cover design, long-term maintenance and monitoring, as well as cost estimates for the proper level of funding to perform final closure construction, 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 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 (SA-RWQCB), and the South Coast Air Quality Management District (SCAQMD).

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

1.2 Proposed Project

The Proposed Project involves implementation of the FCPCMP at OAL. An aerial view of the project site is shown in **Figure 2** and the rendering of what the site would look like under closure conditions is provided in **Figure 3**. No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed.

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 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.

Key elements of the FCPCMP include:

- Final Cover System: Placement of a Title 27-compliant final cover, including vegetative surfaces for erosion control and slope stability.
    - The typical proposed cover section, resulting in a total of 4-feet minimum of soil cover thickness, consists of:

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

        - 2-feet minimum of foundation fill, which includes verification of an existing 1-foot interim cover layer (to be confirmed at the time of closure) and placement of an additional 1-foot minimum of foundation fill to establish minimum gradients for drainage and a subgrade suitable for geosynthetics placement;
        - A liner system consisting of a 60-mil linear low-density polyethylene (LLDPE) super grip net geomembrane overlain by a 12-ounce geotextile or 60-mil LLDPE double sided textured geomembrane overlain by a drainage geocomposite; and
    - 2-feet minimum of protective soil cover placed above the liner to support revegetation. In lieu of the above Alternative Final Cover System, the following Final Cover System is proposed should suitable material be available at time of construction.

        - 4-feet minimum of ET soil cover which includes verification of an existing 1-foot interim cover layer (to be confirmed at the time of closure) and 3-foot minimum of additional approved soils.
    - In select areas such as the main access road to the deck and the perimeter roads modified cover configurations consisting of 6-10 inches of asphalt over a leveled base with Type R geogrid reinforcement would be used to support operational needs;
- Visual/Aesthetic Transition: Conversion from active disposal operations to a closed, vegetated profile visible from surrounding communities and open space.
- Valencia Greenery Continuation: Ongoing operation of the existing green waste composting facility (Valencia Greenery), which operates under a separate permit authority (i.e., Compostable Materials Handling Facility No. 30-AB-0470) and under a separate Mitigated Negative Declaration (MND) both of which authorize and project operation of the green waste composting facility past the landfill's solid waste disposal closure date.
- Material Recovery (MR) activities: Ongoing operation of MR activities past the landfill's solid waste disposal closure date. MR activities are expected to be conducted under the existing landfill permit. If a separate Solid Waste Facility Permit (SWFP) is determined to be necessary by the appropriate regulatory agencies, such permit would be obtained prior to implementation. MR activities are assessed as part of this Addendum.
- Traffic Changes: Overall traffic at the landfill would decrease as compared to historical traffic levels associated with active landfill operations. During final closure construction, there would be additional truck trips due to delivery of final cover materials and construction support, resulting in temporary construction-related traffic and heavy equipment activity. Long-term traffic volumes would thereafter be substantially reduced for post-closure maintenance, Valencia Greenery and MR activities.
- Post-Closure Maintenance: Groundwater and landfill gas monitoring, leachate management, slope inspection, and cover repairs during the 30-year post-closure period.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

1.3 Existing CEQA Documents

Final EIR 588

On April 17, 2007, the Orange County Board of Supervisors (Board) certified Final EIR 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 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 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, OC Waste & Recycling applied for a revision to the existing landfill SWFP, which was issued by the LEA, acting on behalf of CalRecycle. Final EIR 588 is posted on OC Waste & Recycling's website at **www.oclandfills.com** and includes all volumes and appendices.

Addendum No. 5 to Final EIR 588

Addendum No. 5 to Final EIR 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 588. Addendum No. 5 to Final EIR 588 also 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 588 for the Management of High Tonnage Days project was approved by the Director of OC Waste & Recycling on March 31, 2014. Thereafter, OC Waste & Recycling 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 588 is included as **Appendix A**.

Addendum No. 6 to Final EIR 588

Addendum No. 6 to Final EIR 588 focused specifically on extending the permitted closure date of the Olinda Alpha Landfill from 2021 to 2036. It provided background on the landfill's existing CEQA coverage, summarized the original EIR's findings, and compared them to the proposed change. The document included a table comparing Final EIR 588 assumptions, prior Addenda, and the new proposal, redline edits to EIR language updating the closure year, and a resource-by-resource environmental analysis. Each CEQA topics such as aesthetics, air quality, traffic, biological resources, noise, cultural resources, and hazards—was revisited briefly to confirm that extending the closure date would not create new significant impacts or increase the severity of impacts already analyzed. Mitigation measures from the certified EIR were reaffirmed, and the Addendum concluded that no subsequent or supplemental EIR was required,

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

consistent with CEQA Guidelines §15162 and §15164. Addendum No. 6 to Final EIR 588 is included as **Appendix B**.

MND for Valencia Greenery Composting Facility

On May 24, 2022, the Board adopted the Final MND (SCH #2022020473), and associated Mitigation Monitoring and Reporting Program for the Valencia Greenery composting facility located within the Olinda Alpha Landfill property boundary. The MND for which OC Waste & Recycling was the lead agency, evaluated potential environmental impacts associated with the continued operation and improvement of the facility, including receipt, processing, and composting of green and wood waste materials, site grading, equipment operation, and compost product distribution. Environmental impacts were determined to be less than significant with mitigation incorporated, addressing air quality, odor, traffic, and biological resources. The CEQA document further specifies that the Valencia Greenery would continue operating following the closure of the Olinda Alpha Landfill to support regional organics diversion and compliance with state mandates (SB 1383). The MND for Valencia Greenery is included as **Appendix C**.

1.4 Proposed CEQA Document

Proposed Addendum No. 10 to Final EIR 588 (OC Waste & Recycling Log #737)

The Proposed Addendum evaluates the full landfill closure sequence, including cessation of waste disposal that results in the overall facility tonnage substantial decrease relative to the baseline condition, 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 Proposed Addendum evaluates the potential impacts associated with this FCPCMP for the Olinda Alpha Landfill, including:

- Final Cover System: Installation of a vegetated final cover consistent with Title 27, providing erosion control and long-term stability. This would create new visual/aesthetic conditions as the landfill transitions to a closed profile.
- Valencia Greenery Continuation: The on-site green waste/composting facility would continue operations under an existing separate permit, utilizing available space and access roads.
- Materials Recovery (MR) activities – The on-site activities would continue operations, utilizing available space and access roads. MR activities are expected to be conducted under the existing landfill operations and associated regulatory approvals. If a separate Solid Waste Facility Permit (SWFP) is determined to be necessary by the appropriate regulatory agencies, such permit would be obtained prior to implementation. Some traffic would remain with the continued operation of this facility.
- Traffic Changes: Overall traffic at the landfill would decrease as compared to historical traffic levels associated with active landfill operations During final closure construction, there would be additional truck trips due to delivery of final cover materials and construction support, resulting in temporary construction-related traffic and heavy equipment activity. Long-term traffic volumes would be substantially reduced as they

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

would include only post-closure maintenance and activities described for continuation of the Valencia Greenery and MR activities.

- Post-Closure Maintenance: Groundwater and landfill gas monitoring, leachate collection, slope inspections, and cover maintenance for a 30-year regulatory period.

1.5 Other Relevant Documents

Cooperative Agreement with City of Brea

On July 17, 2024, the County and City of Brea amended its existing Cooperative Agreement (July 14, 2009) that provides financial compensation to the City for continued operation of the landfill until the landfill reaches its design buildout final elevation of 1,415 feet AMSL and acknowledges that activities are anticipated to extend beyond the estimate disposal closure date of December 31, 2036. Funding provided to the City by the County in the form of Host Fees provides 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 executed 2024 Cooperative Agreement with the City of Brea is included as **Appendix D**.

1.6 Standards for Preparing an Addendum

California Code of Regulations Title 14 ("CEQA Guidelines"), §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 §15162 calling for preparation of a subsequent or supplemental 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 § 15162 calling for the preparation of a subsequent or supplemental 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 588or adopted negative declaration.

(d) The decision-making body shall consider the Addendum with the Final EIR 588or adopted negative declaration prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent or supplemental EIR pursuant to § 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.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

CEQA Guidelines §15162(a) "subsequent or supplemental EIRs and Negative Declarations", states the following:

(a) When an EIR has been certified or negative declaration adopted for a project, no subsequent or supplemental 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 would 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 would 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 would have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined would 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."

1.7 Proposed Addendum No. 10 to Final EIR 588 Proposed Changes to Final EIR 588

Proposed Addendum No. 10 to Final EIR 588, evaluates the full landfill closure sequence, including cessation of waste disposal that will result in the overall facility tonnage decrease 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-

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

closure maintenance and also evaluated MR activities past the closure date of 2036, would require the following changes to Final EIR 588 and/or adopted changes made in subsequent addenda. Proposed deletions are shown in strikeout, and proposed additions are shown in underlined text as modifications to the existing CEQA documentation for the landfill. Continued operation of the compost facility past the closure date was evaluated as part of the MND and is provided as an appendix.

Project Description (as amended in Section 1.2 of Addendum No.6 to Final EIR 588
~~based on current population projections, daily tonnage, compaction densities, the approved permitted final landfill elevations 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.~~ At closure, the landfill would be covered with a Title 27-compliant engineered final cover system. The typical proposed cover section includes approximately 2-feet minimum of foundation fill which includes 1-foot interim cover (to be confirmed at the time of closure) and placement of an additional 1-foot minimum of foundation fill to establish minimum gradients for drainage and a subgrade suitable for geosynthetic placement; A liner system consisting of a 60-mil linear low-density polyethylene (LLDPE) super grip net geomembrane overlain by a 12-ounce geotextile or 60-mil LLDPE double sided textured geomembrane overlain by a drainage geocomposite, and 2-feet minimum of protective soil cover. In lieu of the above Alternative Final Cover System, should suitable material be available at time of construction. The following Final Cover system is proposed: 4-feet of ET soil cover which includes verification of an existing 1-foot interim cover layer (to be confirmed at the time of closure) and 3-foot minimum of additional approved soils. Certain areas, such as access roads, benches, perimeter roads, and the compost pad area, may utilize modified cover section to accommodate operational and maintenance functions; however, the cover system would generally provide a minimum of 4-feet of engineered or ET cover for infiltration control, erosion resistance, and long-term slope stability. In select areas such as the main access to the deck, and the perimeter roads, modified cover configurations consisting of 6 to 10 inches of asphalt over a leveled base with Type R geogrid reinforcement would be used to support operational needs. Post-closure activities include maintenance of the cover system, groundwater and landfill gas monitoring, leachate collection, and slope inspections, in perpetuity, or for as long as required by applicable regulatory agencies, consistent with the FCPCMP. In addition, the existing on-site green waste composting facility and MR activities are expected to be conducted under the existing landfill operations and associated regulatory approvals. If a separate Solid Waste Facility Permit (SWFP) is determined to be necessary by the appropriate regulatory agencies, such permit would be obtained prior to implementation to allow their continued operation. The Proposed Project would not result in any increase to either the maximum daily permitted tonnage but rather substantially decrease the facility tonnage relative to the baseline condition.

Project objectives of Final EIR 588, Section 1.1.5: "To provide continued regional disposal capacity through December 31, 2036, and thereafter to ensure long-term protection of public health and the environment through implementation of a FCPCMP."

Project Modification Section 1.1.4 of Final EIR 588: The Proposed Project (FCPCMP with continued composting and MR activities) would not result in any increase to the maximum daily permitted tonnage but rather result in an overall facility tonnage decease relative to the baseline conditions analyzed in EIR 588. The Proposed Project (FCPCMP) does not involve expansion

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

of the permitted landfill footprint, rezoning, or changes in land use designations. Instead, the landfill would transition from active disposal to long-term closed site maintenance and monitoring, consistent with Title 27 closure regulations and the SA-RWQCB-approved Closure Plan. Composting and MR activities would continue within existing disturbed pads, providing waste diversion services consistent with AB 939 and SB 1383.

Relevant Plans and Policies Section 5.1 of the Final EIR 588: Brea Cooperative Agreement Commitments: On July 17, 2024, the County and City of Brea amended its existing Cooperative Agreement (July 2009) that provides financial compensation to the City for costs or impacts incurred by the City which might be associated with the Landfill, and acknowledges that the Valencia Greenery and other MR activities are anticipated beyond the estimate disposal closure date of December 3, 2036. The Cooperative Agreement (2024) restates City and County rights and obligations, reflects recent legislative changes and other matters of mutual concern and extends Host Fee payment to the City for inbound non-disposed tonnage that is direct to County Diversion operations initiated to comply with current and future legislation. for continued operation of the landfill until the landfill reaches its design buildout final elevation of 1,415 feet AMSL and acknowledges that activities are anticipated to extend beyond the estimate disposal closure date of December 31, 2036.

Conclusion: Closure and post-closure activities, as well as continued composting and MR activities, ~~are consistent with the County's General Plan, zoning, and CIWMP~~ are consistent with adopted planning documents and waste management policies. No new or more severe land use conflicts would occur.

Project Phasing Section 4.5.4 of Final EIR 588: The final cover design would be constructed in accordance with an approved Final Closure Plan. The final cover includes installation of a Title 27-compliant final cover system consisting of either a 4-foot engineered cover with 2-feet of foundation fill, a 60-mil LLDPE super grip net geomembrane with a 12-ounce geotextile layer, and 2-feet of protective soil cover, or an alternate 4-foot ET soil cover, both of which would be revegetated with primarily native species for erosion control and visual integration. Closure activities also include installing final cover to landfill slopes and long-term revegetation consistent with Final EIR 588 mitigation requirements. With closure, active refuse disposal would cease, eliminating the daily visual impacts associated with working faces and related heavy equipment. Composting and MR activities would continue within previously disturbed operational areas and remain screened from off-site public viewpoints MR activities are expected to be conducted under the existing landfill operations and associated regulatory approvals. If a separate Solid Waste Facility Permit (SWFP) is determined to be necessary by the appropriate regulatory agencies, such permit would be obtained prior to implementation. would
Aesthetics Section 5.8 of Final EIR 588: The certified EIR acknowledged that mitigation measure AS-1 requires that the slopes are vegetated prior to closure. Implementation of the FCPCMP would improve the visual character of the surrounding area.

With closure, aesthetic conditions improve substantially compared to active disposal operations. The final cover and landscaping would reduce contrast between the landfill and adjacent open space, enhancing long-term viewsheds.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

Upon closure, the landfill would be capped with a vegetated final cover system and monitored in perpetuity, or for as long as required by applicable regulatory agencies pursuant to the FCPCMP (FCPCMP, 2026). Monitoring would include gas collection, leachate management, slope stability inspections, and cover repairs. The composting facility would continue under its existing separate permit, with monitoring to ensure consistency with applicable regulations.

Mitigation Measures (continuing) from Final EIR 588 and within the Mitigation, Monitoring and Reporting Program (MMRP):

- **AS-1**: The existing Olinda Alpha Landfill Landscape Master Plan (LMP), as amended that was developed in concert with OCWR and the City of Brea Citizens Advisory Committee in 1994 to address minimization of interim and permanent visual impacts would be revised to include ~~proposed vertical and horizontal expansion.~~ the following:
    - Revegetate all final slopes with a primarily native seed and plant mix compatible with surrounding hillsides.
    - Revise the LMP in consultation with the City of Brea.

Land use and Planning Section 5.1 of Final EIR 588 (as revised): The certified EIR determined that landfill operations would not conflict with the County of Orange General Plan land use designations or zoning for the landfill property. Although landfill operations altered landform and visual character, these changes were within the scope of permitted waste management uses and were anticipated in applicable land use documents. Ongoing coordination with the City of Brea and other agencies was identified as important to maintain compatibility with surrounding open space and residential uses.

2.0 APPROPRIATE LEVEL OF CEQA REVIEW FOR THE PROPOSED PROJECT

To determine the appropriate level of CEQA documentation for the revised closure date for the landfill, OC Waste & Recycling conducted the analysis below. Specifically, the analysis evaluates whether implementation of the FCPCMP, with continued operation of the composting facility and the Materials Recovery activities, would result in any new significant environmental effects or increase the severity of impacts previously identified in Final EIR 588. Temporary stockpiling of closure materials above the permitted maximum elevation, where necessary, is a construction logistics consideration associated with final closure implementation and does not constitute a modification to landfill operations or permitted disposal limits. The analysis herein considers the full closure sequence, including cessation of waste disposal, the interim settlement period, delivery of final cover materials**,** implementation of final closure construction, and long-term post-closure maintenance, and concludes that these activities do not result in new significant environmental effects or a substantial increase in the severity of impacts previously identified in Final EIR 588.Consistent with CEQA Guidelines §15162 and §15164**,** all mitigation measures adopted in Final EIR 588 remain in effect**.**

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

2.1 Aesthetics

Final EIR 588 Findings: Final EIR 588 determined that landfill operations would be visible from certain vantage points in the surrounding hillside areas and from portions of the City of Brea, but that implementation of landscaping and revegetation would reduce long-term visual impacts to less than significant. Final EIR 588 required final grading of landfill slopes, revegetation, and coordination with the City of Brea under the Cooperative Agreement to ensure visual compatibility with adjacent open space. Proposed Project Changes: The proposed FCPCMP includes installation of a Title 27-compliant final cover system that is intended to reduce visual contrast and improve long-term slope stability. The typical final cover section would result in a total of 4-feet minimum of soil cover thickness and consist of 2-feet minimum of foundation fill, which includes 1-foot interim cover (to be confirmed at the time of closure) and placement of an additional 1-foot minimum of foundation fil, a 60-mil LLDPE geomembrane with a 12-ounce geotextile layer, and a 2-foot minimum protective soil layer placed over the liner to support revegetation. In lieu of the above proposed Final Cover system, a final cover system of 4-foot minimum of ET soil cover which includes verification of an existing 1-foot interim cover layer (to be confirmed at the time of closure) and 3-foot minimum of additional approved soils. An alternate 4-foot ET soil cover may also be implemented if determined appropriate during final design. In select areas such as the main access to the deck, and the perimeter roads, modified cover configurations consisting of 6 to 10 inches of asphalt over a leveled base with Type R geogrid reinforcement would be used to support operational needs.

All final cover slopes would be revegetated with native and drought-tolerant species to provide erosion control and visual integration with the surrounding hillsides. With closure, daily visual impacts from actively exposed waste faces and related heavy equipment would cease. Continued operations at the composting facility and MR activities would remain confined to previously disturbed pads and largely screened from public viewpoints. Closure activities also include installing final cover to landfill slopes to achieve stable, well-drained landforms suitable for revegetation**.**

Conclusion and Mitigation: Closure of the landfill would not introduce new sources of light or glare during the day or night; would not degrade scenic resources as none exist on the project site and surrounding vicinity; and would not substantially degrade visual character or quality of the site and surroundings. Closure of the landfill would result in a substantial improvement to the visual character of the site compared to active disposal conditions. The final cover system, revegetation, phased slope closure, further enhance visual compatibility with surrounding land uses. No new or more severe aesthetic impacts would occur, and no subsequent or supplemental EIR is required pursuant to CEQA Guidelines §15162 and §15164.

Continuing Mitigation Measure (from Final EIR 588 and Addendum No.6 and revised):

- **AS-1**: The existing Olinda Alpha Landfill Landscape Master Plan (LMP) that was developed in concert with OCWR and the City of Brea Citizens Advisory Committee in 1994 to address minimization of interim and permanent visual impacts would be revised to include the following elements:

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

- Revegetate all final slopes with native or drought-tolerant plant species consistent with the approved final Landscape Master Plan.
- Implement interim landscaping treatments and visual screening during phased closure.
- Prepare a final Landscape Master Plan as part of the Closure Plan in consultation with the City of Brea.
- Employ berms, phased closures, and strategic landscaping to minimize visual prominence and reduce contrast with surrounding open space.

On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP would not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not expand the landfill footprint or increase the maximum permitted elevation, would replace active working faces with final graded slopes and long-term revegetation, and would continue to implement landscape treatment and visual integration measures that reduce visual contrast with surrounding hillsides compared to active operational conditions.. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and therefore a subsequent or supplemental EIR is not required.

2.2 Agriculture & Forestry Resources

Final EIR 588 Findings: Final EIR 588 found that the landfill site was previously disturbed and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The EIR determined there are no existing agricultural preserves on the landfill property and no preserves were impacted. In addition, Final EIR 588 did not document any conflict with any existing zoning for agricultural uses. As such, no significant agricultural resource impacts occurred under Final EIR 588, and no mitigation measures were required. No forestry uses existed on the site, which is designated for landfill and open space. These findings remain true – the landfill site is now fully developed as an operational landfill, and is not designated as Prima Farmland, Unique Farmland, or Farmland of Statewide Importance. No portion of the landfill site is currently used as agricultural or forestry land.

Proposed Project Changes: Closure and post-closure maintenance activities would occur entirely within the existing landfill footprint and disturbed operational areas. Composting and MR activities would continue in developed areas and would not convert agricultural land or forest land to non-agricultural use. Revegetation of final slopes would use native species, provide ecological benefits and improve visual integration. Closure activities also include installing final cover to landfill slopes to achieve stable, well-drained landforms suitable for revegetation, followed by long-term revegetation. The Proposed Project would not remove any agricultural or forestry uses, as none exist, and would not introduce new agricultural or forestry use.

Conclusion and Mitigation: No agricultural or forestry impacts would occur under the FCPCMP. No additional mitigation is required beyond revegetation commitments already included. No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed. Following the cessation of solid waste disposal operations, facility tonnage will substantially decrease relative to baseline conditions.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP would not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, does not change the existing land use designation of the site from solid waste management uses to agricultural uses, and does not expand the landfill footprint into lands designated or zoned for agricultural production. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and therefore a subsequent or supplemental EIR is not required.

2.3 Air Quality

Final EIR 588 Findings: Final EIR 588 concluded that landfill operations would generate emissions associated with refuse hauling, heavy equipment use, dust generation from soil movement, and landfill gas emissions. These impacts were found to be less than significant with continued implementation of air quality control measures, including dust suppression under SCAQMD Rule 403 and operation of a gas collection and control system consistent with Rule 1150.1. Addendum No. 5 further evaluated air quality and confirmed that emissions would remain within acceptable levels under updated operational conditions.

Proposed Project Changes: The FCPCMP would substantially reduce air pollutant emissions compared to active landfill operations. With the cessation of daily waste acceptance and large-scale equipment operation, emissions from heavy-duty equipment, refuse-hauling trucks, and open working faces would decline significantly. During final cover construction, typical short-term construction emissions (primarily dust and equipment exhaust) would be controlled under SCAQMD Rule 403 and standard construction best management practices. Temporary emissions associated with delivery of final cover materials and final closure construction equipment would occur following the post-closure settlement period and would be controlled through implementation of existing SCAQMD Rule 403 dust-control measures and standard construction best management practices, consistent with the closure scenario evaluated in Final EIR 588.

The final cover system includes installation of a Title 27-compliant final cover system that is intended to reduce visual contrast and improve long-term slope stability. The typical final cover section would result in a total of 4-feet minimum of soil cover thickness and consist of 2-feet minimum of foundation fill, which includes 1-foot interim cover (to be confirmed at the time of closure) and placement of an additional 1-foot minimum of foundation fill, a 60-mil LLDPE geomembrane with a 12-ounce geotextile layer, and a 2-foot minimum protective soil layer placed over the liner to support revegetation. In lieu of the above proposed Final Cover system, a final cover system of 4-foot minimum of ET soil cover which includes verification of an existing 1-foot interim cover layer (to be confirmed at the time of closure) and 3-foot minimum of additional approved soils. An alternate 4-foot ET soil cover may also be implemented if determined appropriate during final design. In select areas such as the main access to the deck, and the perimeter roads, modified cover configurations consisting of 6 to 10 inches of asphalt over a leveled base with Type R geogrid reinforcement would be used to support operational needs. All final cover slopes would be revegetated with native and drought-tolerant species to provide erosion control and visual integration with the surrounding hillsides. With closure, daily

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

visual impacts from actively exposed waste faces and related heavy equipment would cease. Continued operations at the composting facility and MR activities would remain confined to previously disturbed pads and largely screened from public viewpoints. Closure activities also include installing final cover to landfill slopes and long-term revegetation consistent with Final EIR 588 mitigation requirements.

This final cover system would reduce dust generation, prevent erosion, and minimize emissions of volatile organic compounds (VOCs) from exposed waste. Landfill gas collection and control systems would continue to operate under SCAQMD Rule 1150.1, Title 27, and federal New Source Performance Standards (NSPS), maintaining control of methane and associated VOCs. MR activities and composting operations would continue after the closure of the landfill under the FCPCMP. Those activities were previously evaluated as part of Final EIR 588 and the MND for the Valencia Greenery, and both would continue their operations consistent with their existing permits and existing environmental documentation would

Conclusion and Mitigation: Implementation of the FCPCMP would decrease air quality impacts as compared to active landfill operations. No new or more severe air quality impacts would occur beyond what was addressed in Final EIR 588 and subsequent CEQA documents, and air quality mitigation measures established under Final EIR 588 would remain in place. Any impacts resulting from the redistribution of solid waste stream to OC Wate & Recycling's other two active landfills would be assessed as part of those landfills request to increase acceptance of daily tonnage. Following the cessation of solid waste disposal operations, facility tonnage will substantially decrease relative to baseline conditions.

Continuing Mitigation Measures (from Final EIR 588):

- **AQ-1:** Implement dust-control measures consistent with SCAQMD Rule 403 during closure and soil movement activities.
- **AQ-2** Dust generated by the construction activities shall be retained on-site and kept to a minimum by following dust control measures.

The implementation of closure and post closure activities would not result in any new or substantially worsened significant impacts to air quality when compared to the analysis that was included in Final EIR 588. No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed. OC Waste & Recycling would continue to implement mitigation measures AQ-1 and AQ-2.

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any change to the significance conclusion for air quality as analyzed in Final EIR 588 and Addendum No. 5 because the Proposed Project would reduce daily waste acceptance and associated refuse-hauling truck trips and reduce long-term operational emissions over time, limit construction-related emissions to temporary closure activities, and continue operation of required air quality control systems and compliance with SCAQMD permit requirements and best management practices that minimize fugitive dust and criteria pollutant emissions. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and a subsequent or supplemental analysis is not required.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

2.4 Biological Resources

Final EIR 588 Findings: Final EIR 588 concluded that impacts to biological resources associated with landfill operations, including limited impacts to coastal sage scrub habitat and sensitive species, would be reduced to a less-than-significant level through implementation of applicable mitigation measures and compliance with the County of Orange Central/Coastal Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP). These measures included habitat avoidance and minimization strategies, restoration and enhancement requirements, and long-term management and monitoring, as well as coordination with applicable wildlife and regulatory agencies, as appropriate. The Final EIR further identified that implementation of these measures would occur within the framework of existing regulatory approvals and conservation requirements to ensure that project-related activities affecting biological resources are carried out in a manner consistent with adopted conservation objectives and permit conditions.

Proposed Project Changes**:** The FCPCMP would revegetate disturbed areas with native species in accordance with the NCCP/HCP. Closure activities also include installing final cover to landfill slopes and long-term revegetation consistent with Final EIR 588 mitigation requirements.

The proposed revisions to the Landscape Mater Plan (LMP) would continue to provide habitat for wildlife species, such as amphibians, reptiles, birds and mammals, and plant species, such as grasses, shrubs, and trees. The landfill closure system would contribute to the long-term restoration of native habitat and may contribute to the restoration of candidate, sensitive, threatened or endangered species. The landfill closure cover system with soil coverage and primarily native habitat restoration would restore wildlife movement through the landfill potentially supporting a wildlife corridor linkage to Tonner Canyon, north and west of the landfill property and to Chino Hills State Park and Carbon Canyon to the east of the landfill.

Conclusion and Mitigation: The implementation of closure and post closure activities would not result in any new or substantially worsened significant impacts to biological resources when compared to the analysis that was included in Final EIR 588. No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed. Following the cessation of solid waste disposal operations, facility tonnage will substantially decrease relative to baseline conditions.

On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP, would not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not expand the landfill footprint or disturb new habitat areas, would implement final cover installation and long-term revegetation that stabilizes slopes and restores vegetative cover, and would continue to comply with applicable NCCP/HCP requirements, avoidance and minimization measures, and habitat restoration and monitoring commitments that reduce potential effects on coastal sage scrub and sensitive species.. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and therefore a subsequent or supplemental EIR is not required.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

2.5 Cultural Resources

Final EIR 588 Findings: Final EIR 588 evaluated the potential for impacts to historic, archaeological, and paleontological resources within the Olinda Alpha Landfill site. The landfill area had been extensively disturbed by previous grading and waste-management operations. The EIR concluded that there was a low likelihood of encountering intact cultural resources because the site had been heavily modified by decades of excavation and fill placement. Mitigation measures were adopted to ensure that, should cultural materials or human remains be unexpectedly discovered, work would cease, and proper procedures would be followed consistent with State law. No significant cultural-resource impacts were identified with implementation of those measures.

Proposed Project Changes: The proposed FCPCMP involves closure and long-term maintenance activities would occur entirely within the existing landfill footprint and previously disturbed operational areas. No new ground disturbance outside of the permitted boundaries is proposed. Closure construction (final cover placement, drainage installation, and access-road stabilization) would occur on previously filled and compacted areas that have been disturbed repeatedly since landfill operations began. Because the project does not expand the disturbance area or introduce new excavations in undisturbed soil, the potential to affect previously unknown archaeological or historical resources remains minimal.

Continuing Mitigation Measures (from Final EIR 588): The following mitigation measures remain in effect and would continue to be implemented under the FCPCMP:

- **CR-1:** If cultural, archaeological, or paleontological resources are discovered during earth-moving activities, all work in the vicinity of the find shall cease immediately. OC Waste & Recycling shall retain a qualified archaeologist or paleontologist to evaluate the find and recommend appropriate treatment consistent with CEQA Guidelines §15064.5.
- **CR-2:** If human remains are encountered, work shall be halted, and the County Coroner notified. If the remains are determined to be Native American, the Native American Heritage Commission (NAHC) shall be contacted to designate a Most Likely Descendant, and appropriate consultation shall occur pursuant to State law.
- **CR-3:** A Paleontological Resources Impact Mitigation Program (PRIMP) would 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.

Conclusion and Mitigation: The implementation of the Proposed Project would not result in any new or substantially worsened significant impacts to cultural resources when compared to the analysis that was included in Final EIR 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. No cultural-resource impacts would occur under the FCPCMP. The project remains within previously disturbed areas and OCWR would continue to mitigation measures CR-1, CR-2 and CR-3. No additional mitigation is required. No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed. Upon

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

cessation of solid waste disposal operations, facility tonnage will substantially decrease relative to baseline conditions.

On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP would not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not expand the landfill footprint into previously undisturbed areas, does not involve new ground disturbance beyond areas previously evaluated, and would continue to implement applicable cultural resources protection measures, including inadvertent discovery procedures and coordination requirements established in prior CEQA documents. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164, and a subsequent or supplemental EIR is not required.

2.6 Energy

Final EIR 588 Findings: Final EIR 588 determined that energy use associated with landfill operations, including heavy equipment, refuse-hauling trucks, and gas collection systems, would not result in wasteful, inefficient, or unnecessary consumption of energy. Energy use was considered typical for landfill operations and consistent with statewide energy conservation policies.

Proposed Project Changes: Under the FCPCMP, overall energy consumption would be substantially lower than under existing active landfill operations because the most energy-intensive activities associated with daily waste acceptance would cease, including continuous operation of heavy equipment and high volumes of refuse-hauling truck trips to and within the site. Energy use during closure construction would be temporary and limited in duration, consisting primarily of earthwork and installation of the final cover system, which may include placement of the 4-foot engineered cover with geomembrane or the alternative 4-foot evapotranspiration (ET) soil cover. While some ongoing energy use would continue during the post-closure period, including monitoring activities, periodic slope maintenance, Valencia Greenery operations and materials recovery activities, and the continued operation of landfill gas collection, control, and potential beneficial use systems, these activities would occur at a substantially reduced intensity and frequency compared to active landfill operations. Collectively, the transition from daily, high-intensity operational activities to temporary closure construction and lower-intensity post-closure activities would result in a net reduction in long-term energy consumption relative to existing baseline conditions. The landfill gas collection, control, and potential beneficial use systems are regulated under SCAQMD Rule 1150.1, Title 27, and federal NSPS, and are consistent with statewide requirements for methane control and renewable energy use.

Conclusion and Mitigation: The FCPCMP would result in a long-term reduction in overall energy consumption compared to existing active landfill operations because it would eliminate the daily, energy-intensive activities associated with waste acceptance, including continuous operation of heavy equipment, on-site support equipment, and high volumes of refuse-hauling truck trips. Active landfill operations represent the period of highest energy demand over the operational life of the facility due to the frequency and intensity of these activities. In contrast, closure construction activities under the FCPCMP would be temporary and limited in duration,

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

and post-closure activities would consist of periodic monitoring, inspection, maintenance, Valencia Greenery operations and materials recovery activities, and operation of landfill gas collection, control, and potential beneficial use systems, all of which would occur at substantially lower levels of intensity and frequency than active operations. Energy use associated with landfill gas collection and control systems is required to comply with federal, state, and local air quality and solid waste regulations and to reduce emissions of methane and other landfill gases. Where beneficial use of landfill gas is implemented, such systems can offset the use of conventional energy sources and support the State's greenhouse gas reduction and renewable energy goals. Accordingly, implementation of the FCPCMP would not result in a wasteful or inefficient use of energy, and no new or more severe energy-related impacts would occur compared to existing baseline conditions associated with active landfill operations. Because the FCPCMP would represent a net reduction in long-term energy demand and would not introduce new energy-intensive uses, no additional mitigation related to energy consumption is required.

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any change to this significance conclusion for energy as analyzed in Final EIR 588 because the Proposed Project would eliminate daily waste acceptance and the associated energy-intensive equipment use and refuse-hauling truck trips, limit energy use during closure to temporary construction activities, and reduce long-term energy demand to periodic monitoring, maintenance, and operation of required control systems, resulting in a net reduction in energy consumption compared to active landfill operations. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and a subsequent or supplemental EIR is not required.

2.7 Geology and Soils

Final EIR 588 Findings: Final EIR 588 found that with engineered slope design, erosion control, and compliance with applicable regulatory requirements, potential impacts related to seismic stability, settlement, erosion, expansive soils, and soil suitability would be less than significant. Ongoing oversight by the LEA, SA-RWQCB, and CalRecycle was identified as factors ensuring long-term geotechnical integrity of the landfill.

Proposed Project Changes: The proposed FCPCMP includes installation of a Title 27-compliant final cover system that is intended to reduce visual contrast and improve long-term slope stability. The typical final cover section would result in a total of 4-feet minimum of soil cover thickness and consist of 2-feet minimum of foundation fill, which includes 1-foot interim cover (to be confirmed at the time of closure) and placement of an additional 1-foot minimum of foundation fill, a 60-mil LLDPE geomembrane with a 12-ounce geotextile layer, and a 2-foot minimum protective soil layer placed over the liner to support revegetation. In lieu of the above proposed Final Cover system, a final cover system of 4-foot minimum of ET soil cover which includes verification of an existing 1-foot interim cover layer (to be confirmed at the time of closure) and 3-foot minimum of additional approved soils. An alternate 4-foot ET soil cover may also be implemented if determined appropriate during final design. In select areas such as the main access to the deck, and the perimeter roads, modified cover configurations consisting of 6 to 10 inches of asphalt over a leveled base with Type R geogrid reinforcement would be used to support operational needs.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

All final cover slopes would meet approved design contours and revegetated with native and drought-tolerant species, which would stabilize exposed soils, reduce surface runoff velocities, and substantially decrease the potential for erosion compared to existing operational conditions where interim cover and periodically exposed working faces are present. Establishment of long-term vegetative cover would increase root reinforcement of near-surface soils, improve soil structure, and enhance resistance to surface soil loss and localized slope degradation over time, thereby improving overall geotechnical performance of the closed landfill slopes relative to active operational conditions. Closure construction would include installation of the approved final cover system, including low-permeability layers and erosion control components, consistent with the design standards and mitigation requirements identified in Final EIR 588, which were developed to address long-term slope stability, differential settlement, and erosion control. Following closure, the cessation of daily waste placement and heavy equipment traffic on landfill slopes would further reduce ongoing surface disturbance, soil displacement, and compaction-related degradation that can contribute to erosion and slope instability during active operations. Continued operations at the composting facility and materials recovery (MR) areas would remain confined to previously disturbed pads and would not involve new grading, excavation, or expansion into undisturbed areas.

Conclusion and Mitigation: Implementation of the FCPCMP would not result in new or more severe significant impacts related to geology and soils compared to those previously analyzed for ongoing landfill operations. The final cover system, long-term revegetation, and reduction in daily operational disturbance would collectively reduce erosion potential and improve long-term slope stability and surface soil retention relative to existing baseline conditions. No new structures or facilities are proposed as part of the Proposed Project that would increase exposure of people or property to geologic hazards such as slope instability, seismic-related ground movement, or soil failure. The project would continue to be subject to applicable regulatory design standards, geotechnical design criteria, inspection protocols, and long-term maintenance programs to ensure continued slope performance and soil stability over the post-closure period. Accordingly, impacts related to geology and soils would remain less than significant, and no additional mitigation is required.

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any change to the significance conclusion for geology and soils as analyzed in Final EIR 588 because the Proposed Project does not introduce new structures or land uses that would expose people or property to geologic hazards, does not expand the landfill footprint, and includes final engineered cover systems, and long-term revegetation that would reduce erosion and improve long-term slope stability compared to active operational conditions. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and a subsequent or supplemental EIR is not required.

2.8 Greenhouse Gas Emissions

Final EIR 588 Findings: Final EIR 588 was certified in 2007, prior to adoption of Assembly Bill 32 (AB 32) and CEQA Guidelines §15064.4. As such, the original EIR did not include a quantitative greenhouse gas (GHG) analysis. Subsequent Addendum No. 5 included a GHG emissions evaluation based on updated tonnage and operational conditions and concluded that

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

continued landfill operations with gas collection and control systems would not result in new or significant GHG impacts beyond those typical of permitted landfill activity.

Proposed Project Changes: The proposed FCPCMP includes installation of a Title 27-compliant final cover system that is intended to reduce visual contrast and improve long-term slope stability. The typical final cover section would result in a total of 4-feet minimum of soil cover thickness and consist of 2-feet minimum of foundation fill, which includes 1-foot interim cover (to be confirmed at the time of closure) and placement of an additional 1-foot minimum of foundation fill, a 60-mil LLDPE geomembrane with a 12-ounce geotextile layer, and a 2-foot minimum protective soil layer placed over the liner to support revegetation. In lieu of the above proposed Final Cover system, a final cover system of 4-foot minimum of ET soil cover which includes verification of an existing 1-foot interim cover layer (to be confirmed at the time of closure) and 3-foot minimum of additional approved soils. An alternate 4-foot ET soil cover may also be implemented if determined appropriate during final design. In select areas such as the main access to the deck, and the perimeter roads, modified cover configurations consisting of 6 to 10 inches of asphalt over a leveled base with Type R geogrid reinforcement would be used to support operational needs.

All final cover slopes would be revegetated with native and drought-tolerant species to provide erosion control and visual integration with the surrounding hillsides. Closure activities also include installing final cover to landfill slopes to achieve stable, well-drained landforms suitable for revegetation, followed by long-term revegetation. Continued operations at the composting facility and MR activities would remain confined to previously disturbed pads and largely screened from public viewpoints.

Implementation of the FCPCMP would result in a long-term reduction in GHG emissions compared to existing active landfill operations because the primary sources of landfill-related GHG emissions would decline following cessation of waste acceptance and daily operations. Methane generation from landfilled waste is highest during active disposal and early post-disposal periods and decreases over time as readily degradable organic material is consumed and biological decomposition rates diminish. As the landfill transitions into closure and post-closure phases, the volume of newly placed waste that contributes to future methane generation would cease, and overall landfill gas generation rates would decline over time. In addition, closure of active disposal areas would reduce routine daily operational activities that generate GHG emissions, including refuse-hauling truck trips, on-site heavy equipment use and other combustion-related sources associated with active waste placement.

Continuous operation of the landfill gas collection and control system would remain in place following closure to capture and control methane and other landfill gases in accordance with regulatory requirements. Ongoing gas collection substantially reduces fugitive methane emissions by intercepting landfill gas prior to release to the atmosphere. Post-closure maintenance activities would occur at a substantially reduced frequency and intensity compared to daily landfill operations and would represent a minor and intermittent source of GHG emissions relative to the baseline operational conditions.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

Conclusion and Mitigation: Based on the reduced long-term emission profile associated with landfill closure and post-closure conditions, the Proposed Project would not exceed applicable greenhouse gas thresholds of significance. Accordingly, implementation of the FCPCMP would not result in new or more severe significant impacts related to GHG emissions compared to those previously analyzed in prior CEQA documents. The transition from active disposal operations to closure and post-closure conditions would reduce long-term methane generation and eliminate daily operational emission sources, while continued gas collection and control would minimize fugitive emissions during the post-closure period. Therefore, GHG impacts would remain less than significant, and no additional mitigation is required

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any change to the significance conclusion for this environmental topic as analyzed in Final EIR 588 and Addendum No. 5 because the Proposed Project would eliminate daily waste acceptance activities, reduce long-term landfill gas generation over time as waste decomposition rates decline, and continue operation of landfill gas collection and control systems that minimize fugitive methane emissions, without introducing new or more energy- or emissions-intensive activities. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and a subsequent or supplemental EIR is not required.

2.9 Hazards and Hazardous Materials

Final EIR 588 Findings: Final EIR 588 determined that the Olinda Alpha Landfill operates under strict state and local hazardous materials management requirements administered by the Orange County Health Care Agency, the LEA, and the SCAQMD. Hazardous materials used in daily operations were limited to fuels, lubricants, and maintenance supplies stored and managed in accordance with hazardous materials business plans. The EIR found that with adherence to these plans and implementation of standard health-and-safety procedures, potential impacts would be less than significant.

Proposed Project Changes: The proposed FCPCMP does not introduce new hazardous materials or processes. During closure, temporary use of fuels and solvents for construction equipment would occur under existing safety controls and regulatory oversight. Post-closure operations would continue to involve routine maintenance of landfill gas, leachate, and stormwater systems-activities already covered under existing permits and facility health-and-safety procedures.

All hazardous materials management, emergency response, and fire-prevention measures would continue to comply with the Orange County Health Care Agency, CalRecycle, and Orange County Fire Authority (OCFA) requirements. Coordination with the City of Brea under the 2024 Brea Cooperative Agreement would continue for emergency-access and fire-protection planning associated with closure and long-term maintenance.

Conclusion: Implementation of the FCPCMP would not result in new hazards or hazardous materials impacts beyond those previously analyzed in Final EIR 588 because the Proposed Project does not introduce new hazardous materials, does not change the types or quantities of hazardous materials used in a manner that would increase risk, and does not involve new land uses or structures that would expose people or sensitive receptors to hazardous materials. Closure

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

and post-closure activities would occur within previously disturbed operational areas and would continue to be governed by existing hazardous materials management programs, emergency response procedures, and regulatory oversight. No changes to the maximum permitted daily tonnage, landfill footprint are proposed that would alter the risk profile associated with hazardous materials management at the site. Upon cessation of solid waste disposal, overall facility tonnage will substantially decrease relative to baseline conditions. Accordingly, no new or more severe significant impacts related to hazards and hazardous materials would occur under the FCPCMP, and no additional mitigation is required beyond continued compliance with existing regulatory and health-and-safety requirements. On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP would not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not introduce new hazardous materials or hazardous waste streams, does not change the types or quantities of hazardous materials used in a manner that would increase risk, and would continue to operate under existing hazardous materials management plans, emergency response procedures, and regulatory oversight applicable to the landfill. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and therefore a subsequent or supplemental EIR is not required.

2.10 Hydrogeology and Water Quality

Final EIR 588 Findings: Final EIR 588 determined that with implementation of engineered drainage, leachate collection, and groundwater-monitoring systems, potential impacts to surface water and groundwater quality would be less than significant. The EIR required design of storm-drain systems, sediment basins, and landfill cover to meet SA-RWQCB standards and Title 27. Surface-water runoff and storm-drain facilities were designed to control erosion and prevent sedimentation in adjacent drainages.

Proposed Project Changes: The proposed FCPCMP includes installation of a Title 27-compliant final cover system that is intended to reduce visual contrast and improve long-term slope stability. The typical final cover section would result in a total of 4-feet minimum of soil cover thickness and consist of 2-feet minimum of foundation fill which includes 1-foot interim cover (to be confirmed at the time of closure) and placement of an additional 1-foot minimum of foundation fill, a 60-mil LLDPE geomembrane with a 12-ounce geotextile layer, and a 2-foot minimum protective soil layer placed over the liner to support revegetation. In lieu of the above proposed Final Cover system, a final cover system of 4-foot minimum of ET soil cover which includes verification of an existing 1-foot interim cover layer (to be confirmed at the time of closure) and 3-foot minimum of additional approved soils. An alternate 4-foot ET soil cover may also be implemented if determined appropriate during final design. In select areas such as the main access to the deck, and the perimeter roads, modified cover configurations consisting of 6 to 10 inches of asphalt over a leveled base with Type R geogrid reinforcement would be used to support operational needs.

All final cover slopes would be revegetated with native and drought-tolerant species to provide erosion control and visual integration with the surrounding hillsides. With closure, actively exposed waste faces, heavy equipment daily usage, and dust generation would cease Closure activities also include installing final cover to landfill slopes to achieve stable, well-drained

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

landforms suitable for revegetation, followed by long-term revegetation. Continued composting and MR activities would remain within existing disturbed pads served by existing stormwater controls and would not expand into new areas that could increase runoff or affect surface water quality. The final cover system is designed to shed stormwater, minimize percolation into waste materials, and maintain geotechnical stability.

Post-closure maintenance would include ongoing monitoring of stormwater drainage structures, sediment basins, down drains, and water quality in accordance with the approved Stormwater Pollution Prevention Plan (SWPPP), WDRs, and the landfill's National Pollutant Discharge Elimination System (NPDES) permit. Closure does not increase impervious surface area or alter the established drainage pattern, and no increases in peak runoff or pollutant loading are anticipated. Continued composting and MR activities would occur on existing developed pads and are not expected to affect hydrologic conditions.

Conclusion and Mitigation: Implementation of the FCPCMP is expected to improve long-term stormwater and water quality performance by reducing infiltration through the final cover and stabilizing slopes. Regulatory monitoring would remain in place to detect and correct any potential issues. Therefore, no new or substantially more severe hydrology or water quality impacts would occur compared to Final EIR 588.

Continuing Mitigation Measures (from Final EIR 588):

- **HYD-2:** Maintain and operate all surface-drainage and stormwater-control systems in accordance with the approved SWPPP, Water Quality Management Plan (WQMP), and RWQCB WDRs.
- **HYD-3:** The Corrective Action System in place at the landfill would continue operation during the extended landfill operation if detections of volatile organic compounds (VOCs) in groundwater continue.

The implementation of the FCPCMP would 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 588. OCWR would continue to implement mitigation measures HYD-2 and HYD-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.

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any change to the significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not expand the landfill footprint, does not increase permitted disposal capacity or daily tonnage, does not introduce new sources of potential pollutants, and would continue to implement approved stormwater management, surface water protection, and groundwater monitoring and corrective action programs that control runoff, leachate, and groundwater quality. Upon cessation of solid waste disposal operations, overall facility tonnage will substantially decrease relative to baseline conditions. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and a subsequent or supplemental EIR is not required.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

2.11 Surface Water Hydrology

Final EIR 588 Findings: Final EIR 588 determined that potential impacts to surface water hydrology would be less than significant with implementation of engineered drainage improvements, sediment basins, and energy-dissipation systems designed to control runoff and prevent erosion. The EIR required compliance with RWQCB requirements and Title 27, ensuring that stormwater runoff from landfill slopes would not adversely affect downstream drainages. The EIR also required ongoing coordination with the City of Brea regarding shared drainage features.

Proposed Project Changes: The proposed FCPCMP includes installation of a Title 27-compliant final cover system that is intended to reduce visual contrast and improve long-term slope stability. The typical final cover section would result in a total of 4-feet minimum of soil cover thickness and consist of 2-feet minimum of foundation fill which includes 1-foot interim cover (to be confirmed at the time of closure) and placement of an additional 1-foot minimum of foundation fill, a 60-mil LLDPE geomembrane with a 12-ounce geotextile layer, and a 2-foot minimum protective soil layer placed over the liner to support revegetation. In lieu of the above proposed Final Cover system, a final cover system of 4-foot minimum of ET soil cover which includes verification of an existing 1-foot interim cover layer (to be confirmed at the time of closure) and 3-foot minimum of additional approved soils. An alternate 4-foot ET soil cover may also be implemented if determined appropriate during final design. In select areas such as the main access to the deck, and the perimeter roads, modified cover configurations consisting of 6 to 10 inches of asphalt over a leveled base with Type R geogrid reinforcement would be used to support operational needs.

All final cover slopes would be revegetated with native and drought-tolerant species to provide erosion control and visual integration with the surrounding hillsides. With closure, daily visual impacts from actively exposed waste faces, heavy equipment, and dust generation would cease. Closure activities also include installing final cover to landfill slopes and long-term revegetation consistent with Final EIR 588 mitigation requirements. Continued operations at the composting facility and MR activities would remain confined to previously disturbed. In both cases, slopes would be graded to promote positive drainage, minimize infiltration, and prevent ponding. Stormwater would continue to be routed through perimeter ditches, down drains, and sedimentation basins as required by the SWPPP, WDRs, and NPDES regulations.

Closure of active disposal areas would decrease the extent of exposed waste and unprotected surfaces, leading to long-term stabilization of flow paths and reduced potential for erosion and sediment transport. No significant changes to existing hydrologic drainage patterns or significant increases in runoff volumes or peak flows are anticipated. Composting and MR activities would remain within previously developed areas served by existing drainage systems.

Closure construction and post-closure conditions would further reduce the potential for adverse surface hydrology effects relative to active operational conditions. Installation of final cover systems and long-term revegetation would stabilize landfill slopes, reduce erosion and sediment transport, and moderate surface runoff velocities, thereby reducing the potential for downstream sedimentation and localized changes in flow patterns. Cessation of daily waste placement and

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

heavy equipment activity would reduce surface disturbance and exposure of bare soil and waste, further decreasing the potential for mobilization of sediments and pollutants during storm events. Stormwater drainage facilities, conveyance features, and detention or treatment systems would continue to operate in accordance with approved design standards and regulatory requirements, ensuring that post-closure runoff is managed in a manner consistent with existing hydrologic assumptions and compliance obligations.

Mitigation Measures H-1, H-2, and H-3 identified in Final EIR 588 have been completed, and OC Waste & Recycling would continue to implement Mitigation Measures H-4, H-5, and H-6, which include ongoing inspection, maintenance, and performance of surface drainage and stormwater control features, as well as compliance with applicable water quality permits and regulatory requirements. Continued implementation of these measures ensures that surface water conveyance systems remain functional and that potential effects on downstream hydrology remain controlled over the long term.

Conclusion and Mitigation: Based on the absence of physical expansion or intensification of landfill operations, the continuation of existing drainage infrastructure and stormwater management programs, and the hydrologic benefits associated with final cover installation and revegetation, implementation of the FCPCMP would not result in new or substantially worsened significant impacts to surface water hydrology compared to those analyzed in Final EIR 588. Accordingly, impacts to surface water hydrology would remain less than significant, and no additional mitigation measures beyond continued implementation of Mitigation Measures H-4, H-5, and H-6 are required.

Continuing Mitigation Measures (from Final EIR 588):

- **HYD-SW-4**: The landfill (including the expansion area) would continue to operate under an NPDES Permit to discharge storm flows. The criteria and restrictions of the NPDES Permit and the SWPPP and BMPs that accompany the NPDES Permit would be adhered to.
- **HYD-SW-5:** Positive drainage would be ensured in the expansion area by maintaining a two to three percent slope on all landfill deck surfaces.
- **HYD-SW-6**: During all landfilling operations, sediment and erosion control plans would continue to be prepared and implemented on an annual basis to reduce sediment and control erosion on the landfill site.

Implementation of the FCPCMP would not result in new or substantially more severe significant impacts to surface water hydrology compared to those analyzed in Final EIR 588 because the Proposed Project does not introduce new sources of stormwater runoff, alter watershed boundaries, or modify existing drainage patterns beyond those previously evaluated for landfill operations. The FCPCMP does not involve expansion of the landfill footprint, increases in maximum permitted daily tonnage, changes to the permitted disposal area, or changes to the total design capacity of the landfill. As a result, the overall extent of impervious surfaces, engineered slopes, and drainage infrastructure that influence surface water flow characteristics would remain consistent with the baseline conditions analyzed in Final EIR 588.wouldwould There are no

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

changes being proposed to maximum daily permitted tonnage, the permitted area of the landfill, maximum permitted elevation or depth or total design capacity.

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any change to the significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not expand the landfill footprint, does not increase the maximum permitted daily tonnage, does not alter the permitted drainage areas or surface water conveyance systems, and includes final cover installation and long-term revegetation that would stabilize slopes and reduce runoff and sediment transport relative to active operational conditions. Following cessation of solid waste disposal operations, facility tonnage will substantially decrease relative to baseline conditions. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and a subsequent or supplemental EIR is not required.

2.12 Land Use and Planning

Final EIR 588 Findings: Final EIR 588 determined that the Olinda Alpha Landfill was consistent with the County of Orange General Plan, the City of Brea General Plan, and the County Integrated Waste Management Plan (CIWMP). The EIR concluded that the landfill use and associated facilities, including ancillary infrastructure such as access roads, drainage systems, and slope stabilization areas, were compatible with surrounding open-space and utility land uses. The EIR also required coordination with the City of Brea ensure land-use consistency at closure and post-closure.

Proposed Project Changes: The proposed FCPCMP represents the final phase of the landfill's permitted operations, including installation of the final cover system, continuation of the MR activities and composting facility, and implementation of post-closure maintenance and monitoring. These activities would occur entirely within the existing landfill property and do not alter the permitted boundaries, land-use designations, or adjacent open-space interface.

The FCPCMP remains fully consistent with the CIWMP Continued operation of the MR activities and composting facility is consistent with landfill master development plan evaluated under Final EIR 588. MR activities would either be conducted as part of existing landfill operations under the current solid waste facility permit framework or, if determined necessary by regulatory agencies, under a separate Solid Waste Facility Permit (SWFP). In either case, MR activities would remain subject to the same land use entitlements, permitting requirements, and regulatory oversight that govern solid waste management uses at the site. This regulatory framework ensures that MR activities are consistent with the site's existing land use designation and zoning and remain compatible with surrounding land uses. Because MR activities would not expand the landfill footprint, introduce a new land use category, or alter the approved land use entitlements for the site, the Proposed Project would not result in a land use incompatibility or conflict with applicable land use plans and policies.

Land Use Compatibility Commitments (as reflected in the Brea Cooperative Agreement):

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

Long-term compatibility of the landfill with surrounding land uses is maintained through coordinated landscape planning, visual integration measures, and ongoing communication with adjacent communities, consistent with the Landscape Master Plan for the landfill (which is intended to guide long-term revegetation and visual treatment of landfill slopes and operational areas and may be updated over time) and the coordination requirements identified in Final EIR 588. These commitments ensure that closure and post-closure conditions are visually integrated with surrounding hillsides and adjacent land uses and that ongoing landfill-related activities do not create land use conflicts with neighboring communities. In this context, the 2024 Cooperative Agreement between the County and City of Brea includes the following commitments that support land use compatibility:

- Coordinated Closure Planning: The County would prepare and submit a final Landscaping Plan in consultation with the City of Brea, ensuring that seed mixes and plant palettes are consistent with native vegetation communities on surrounding slopes, which supports visual continuity and long-term compatibility with adjacent land uses.
- Visual Integration: The County would employ operational practices and site design measures that minimize the visual prominence of landfill features and related operations, which may include use of berms, phased closure sequencing (including accelerated front face phasing where applicable), and strategically placed landscape materials to reduce visual contrasts with surrounding land uses.
- Community Interface and Responsiveness: The County would continue to maintain public reporting and response mechanisms for operational nuisances such as odor and dust, which support land use compatibility by providing a means to identify and address off-site effects that could otherwise interfere with the use and enjoyment of surrounding land uses.

Conclusion and Mitigation: Implementation of the FCPCMP would not result in land use or planning impacts because the Proposed Project does not change the land use designation of the site, does not introduce new land uses, and does not expand the landfill footprint or maximum permitted elevation. The project remains consistent with the landfill's approved land use, the Landscape Master Plan framework, and the coordination and compatibility objectives identified in Final EIR 588. No additional mitigation is required beyond continued implementation of existing land use coordination, visual integration, and community interface commitments.

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in new significant land use or planning impacts or a substantial increase in the severity of previously identified impacts as analyzed in Final EIR 588 because the Proposed Project does not change the land use designation of the site, does not introduce new or incompatible land uses, does not expand the landfill footprint or permitted operational area, and continues to implement adopted landscape, visual integration, and community interface measures that maintain compatibility with surrounding land uses. Therefore, the Proposed Project is consistent with CEQA Guidelines Sections 15162 and 15164, and preparation of a Subsequent or Supplemental EIR is not required.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

2.13 Mineral Resources

Final EIR 588 Findings: Final EIR 588 concluded that no significant mineral resources would be affected by landfill operations. The landfill site was previously disturbed and was not designated by the State Mining and Geology Board (SMGB) as containing significant mineral resource zones (MRZs). The EIR noted that historical mineral extraction activities in the area had ceased prior to landfill development and that the site was no longer viable for mineral recovery due to ongoing landfill operations and the placement of engineered fill.

Proposed Project Changes: The proposed FCPCMP would occur entirely within the existing landfill footprint and does not involve new grading or excavation in undisturbed areas with the exception of final cover terminations to daylight to existing grade at disturbance limits. All activities—including the installation of the final cover to landfill slopes, and continued operation of MR activities and composting facility—would occur in areas already developed or altered by previous landfill activities.

Conclusion and Mitigation: No mineral resource impacts would occur under the FCPCMP.

On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP would not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not involve new mineral extraction, does not expand the landfill footprint into areas identified as regionally significant mineral resource zones, and does not introduce any new land uses that would affect known mineral resource. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and therefore a subsequent or supplemental EIR is not required.

2.14 Noise and Vibration

Final EIR 588 Findings: Final EIR 588 determined that noise generated by landfill operations, including heavy equipment use and refuse-hauling truck activity, would not exceed applicable County or City of Brea standards at nearby sensitive receptors with implementation of noise control measures. Noise levels were found to attenuate significantly due to distance and intervening topography. The EIR required compliance with operational hour limitations, equipment maintenance, and other noise reduction practices. Vibration impacts were determined to be minimal and less than significant due to the nature of landfill activities and distance to receptors.

Proposed Project Changes: Under the FCPCMP, noise levels at and around the landfill would decrease over the long term as active waste disposal ceases and associated heavy equipment and truck traffic are eliminated. During closure construction, short-term noise may be generated by grading, earth movement, and placement of the final cover system (engineered cover or ET cover) but it would not exceed current active landfill operational noise levels and is expected to be lower than during active landfill operations. These temporary activities would comply with applicable construction noise standards, including limitations on hours of operation. Post-closure noise sources would include occasional maintenance equipment and continued operation of the composting facility and MR activities, both of which were previously evaluated under

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

Final EIR 588 and the MND for the Valencia Greenery. Vibration levels are expected to remain negligible and lower than during active landfill operations because daily refuse placement and continuous operation of heavy equipment (e.g., compactors, dozers, loaders) would be reduced, and post-closure activities would be limited to temporary closure construction and periodic monitoring and maintenance, which generate substantially lower vibration levels and occur at a much lower frequency than ongoing landfill operations. Temporary construction-related noise associated with delivery of final cover materials and final closure construction activities would occur following the post-closure settlement period and would be limited in duration, would occur during permitted hours, and be consistent with noise levels previously evaluated for landfill closure activities in Final EIR 588.

Conclusion and Mitigation: Overall, noise and vibration levels would decrease following closure due to cessation of daily landfill activities. Closure-related construction noise would be temporary and subject to existing regulatory limits. No new or more severe noise or vibration impacts are anticipated beyond those evaluated in Final EIR 588.

Continuing Mitigation Measures (from Final EIR 588):

- **NOI-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.
- **NOI-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.
- **NOI-3:** The project contractor shall Located equipment staging in areas to result in the greatest distance between construction related noise sources and noise sensitive receptors near active construction areas during all project construction
- **NOI-4:** The project contractor 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 any time on Sunday or a federal holiday.

Implementation of the FCPCMP would not result in any new or substantially worsened significant impacts to noise when compared to the analysis that was included in Final EIR 588 and Addenda to Final EIR 588. Vibration impacts would continue to remain less than significant and would remain subject to mitigation measures N-1 through N-4.

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any change to this significance conclusion for noise and vibration as analyzed in Final EIR 588 because the Proposed Project would reduce daily waste acceptance activities and associated refuse-hauling truck trips and heavy equipment operations, limit noise-generating activities to temporary closure construction, and reduce long-term operational noise to periodic monitoring and maintenance activities, resulting in a net reduction in ongoing noise levels compared to active landfill operations.. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and a subsequent or supplemental EIR is not required.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

2.15 Population and Housing

Final EIR 588 Findings: Final EIR 588 determined that operation of the Olinda Alpha Landfill would not result in any population growth or displace any existing housing. The project did not include residential uses and was located in an area designated for landfill and open-space use. The EIR also found that the landfill and related infrastructure would not create new employment opportunities or economic activity that would induce population growth in the surrounding region.

Proposed Project Changes: The proposed FCPCMP would not result in population growth, housing development, or residential displacement. Closure and post-closure activities would occur entirely within the existing landfill footprint which does not include any residentially zoned property or any existing residential uses and would involve limited short-term construction personnel and would not involve the creation of new, long-term employment beyond what was previously disclosed and contemplated by Final EIR 58, its addenda, and the MND for Valencia Greenery. Once closure is complete, only a small staff drawn from OC Waste & Recycling's existing personnel and accounted for in Final EIR 588 would be required for ongoing maintenance and monitoring.

The FCPCMP does not involve any change to the existing land-use designations or introduce new residential or commercial components.

Conclusion and Mitigation: No population or housing impacts would occur under the FCPCMP. No additional mitigation is required beyond the land-use coordination commitments already included in Final EIR 588, and its addenda, as there are no population or housing impacts. No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed. Upon cessation of solid waste disposal operations, overall facility tonnage will substantially decrease relative to baseline conditions.

On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP would not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not include residential development, does not induce population growth, does not displace existing housing or residents, and does not introduce new land uses that would create demand for additional housing. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and therefore a subsequent or supplemental EIR is not required.

2.16 Public Services

Final EIR 588 Findings: Final EIR 588 determined that adequate public services—including fire protection, police services, emergency access, and utilities—were available to serve the landfill and that operations would not create the need for new or expanded facilities. The EIR concluded that potential impacts related to fire hazards would be less than significant with implementation of fuel-modification zones, fire-prevention measures, and ongoing coordination with the OCFA and the City of Brea.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

Proposed Project Changes: The proposed FCPCMP would not result in increased demand for public services. During closure, temporary construction would be limited to the existing landfill footprint and would continue to comply with OCFA fire-protection standards, the approved Fuel Modification Plan, and the landfill's Emergency Response Plan. Post-closure maintenance would involve routine monitoring and upkeep of drainage, vegetation, and landfill-gas systems and would not require additional fire-protection or emergency-response capacity because these activities are limited in scope and frequency, occur within an existing, permitted solid waste facility with established access, fire protection measures, and emergency response protocols, and do not introduce new land uses, populations, or hazardous conditions that would increase demand for fire or emergency services beyond current operational conditions.

OC Waste & Recycling would continue coordination with OCFA, the County of Orange, and the City of Brea to maintain emergency-access routes, ensure adequate water-supply availability for fire suppression, and implement vegetation-management programs consistent with the approved Fuel Modification Plan.

Conclusion and Mitigation: No impacts to public services would occur under the FCPCMP. No additional mitigation is required beyond the fire-protection and emergency-access commitments already included. No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed.

On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP would not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not include new residential, commercial, or institutional development, does not increase population or employment levels that would generate additional demand for public services, and would reduce daily operational activities over time, thereby decreasing service demands associated with active landfill operations (e.g., law enforcement, fire protection, emergency response). The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and therefore a subsequent or supplemental EIR is not required.

2.17 Recreation

Final EIR 588 Findings: Final EIR 588 determined that the Olinda Alpha Landfill site and surrounding buffer areas do not contain recreational facilities and that landfill operations would not increase the use of existing parks or recreational areas. The EIR found that closure of the landfill and subsequent revegetation would be compatible with the surrounding open-space network managed by the City of Brea and regional habitat areas, with no adverse impacts on recreational resources. Closure activities also include installing final cover to landfill slopes to achieve stable, well-drained landforms suitable for revegetation**,** followed by long-term revegetation.

Proposed Project Changes: The proposed FCPCMP would not introduce or expand recreational uses. All closure and post-closure activities would occur entirely within the existing landfill boundaries. Long-term site management would focus on maintenance of the final cover, stormwater-control features, and revegetated areas.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

Conclusion and Mitigation: No recreation impacts would occur under the FCPCMP as the closure of a currently active landfill site neither introduces new demand for recreational uses nor introduces new recreational uses.

On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP would not result in any changes to this significance conclusion for recreational resources as set forth in Final EIR 588 because the Proposed Project does not include residential or commercial development that would increase population or demand for recreational facilities, does not convert or restrict access to existing recreational resources, and does not expand the landfill footprint into areas designated or used for recreational purposes.. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and therefore a subsequent or supplemental EIR is not required.

2.18 Transportation and Circulation

Final EIR 588 Findings: Final EIR 588 determined that traffic generated by landfill operations—including truck trips for waste delivery, daily cover, maintenance supplies, and employee commuting—would remain within acceptable service levels on local roadways. Access to the landfill via Valencia Avenue and Carbon Canyon Road was found to operate satisfactorily under projected peak-hour conditions evaluated in the EIR. Implementation of haul-route controls and ongoing coordination with the City of Brea ensured roadway safety and maintained acceptable service levels. The EIR concluded that transportation impacts would be less than significant.

Proposed Project Changes: The proposed FCPCMP represents the final phase of landfill operations. As of July 1, 2025, OC Waste & Recycling reduced acceptance of waste at the Olinda Alpha Landfill consistent with the phased closure anticipated in Final EIR 588. This reduction has lowered daily and peak-hour heavy-truck volumes along Valencia Avenue, Carbon Canyon Road, and related intersections. Upon full closure of the landfill, waste-hauling truck trips for active disposal would be eliminated. Only limited truck activity associated with site maintenance and the existing MR activities and Valencia Greenery composting operations would continue under existing permits and previously analyzed throughput levels. Temporary truck traffic associated with delivery of final cover materials and construction support would occur prior to and during final closure construction following the post-closure settlement period; however, such traffic would be temporary, limited in duration, significantly lower levels than currently associated with the active landfill operations, and consistent with the landfill closure activities analyzed in Final EIR 588.

Accordingly, the Proposed Project results in a net decrease in truck traffic, reduced congestion, lower emissions, reduced roadway wear, and fewer peak-hour conflicts along the existing haul-route system. No changes are proposed to maximum permitted tonnage, haul-route connections, or roadway infrastructure. OC Waste & Recycling would continue to coordinate management of roadway operations with the City of Brea.

SB 743 and the Use of Vehicle Miles Traveled (VMT) as the CEQA Transportation Metric: Although the General Development Plan (GDP) EIR for the Olinda Alpha Landfill evaluated transportation impacts using the Level of Service (LOS) metric, LOS is no longer an appropriate

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

measure of transportation-related environmental impacts under CEQA. Senate Bill (SB) 743 (2018) directed the Governor's Office of Planning and Research (OPR, now the Office of Land Use and Climate Innovation) to establish a new metric for identifying and mitigating transportation impacts. Public Resources Code (PRC) §21099(b) expressly states that automobile delay—as measured through LOS or similar measures of roadway congestion—shall not be considered a significant environmental impact under CEQA. OPR identified VMT as the required metric for evaluating transportation impacts, and it is now the only legally acceptable threshold for transportation-related impacts under CEQA.

§15064.3 of the State CEQA Guidelines codifies VMT as the basis for identifying transportation impacts. Subdivision (b) outlines criteria for land use projects, transportation projects, qualitative assessments, and methodological flexibility for Lead Agencies. These provisions became applicable statewide July 1, 2020.

VMT measures the amount and distance a person drives, accounting for vehicle occupancy. To implement SB 743, the County amended its Transportation Implementation Manual in 2021 (Resolution No. 21-138), including adoption of Appendix B: *Final Guidelines for Evaluating Vehicle Miles Traveled Under CEQA* (LSA 2020). The Orange County 2020 Local CEQA Procedures Manual likewise establishes VMT as the applicable CEQA transportation metric and provides screening criteria for determining when detailed VMT analysis is required.

Project Screening Under County VMT Guidelines: The Proposed Project is neither a land use development project nor a transportation project. No new infrastructure or expansion of operations is proposed.

Under the County's *Final Guidelines for Evaluating Vehicle Miles Traveled under CEQA* (LSA 2020), certain public-service facilities—including fire stations, sheriff facilities, jails, community centers, refuse facilities, and landfills—are categorically screened from requiring a VMT analysis because their VMT is part of the existing regional average and they provide essential community services. As a public facility and essential service, Olinda Alpha Landfill meets these screening criteria. Therefore, the Proposed Project is screened from VMT analysis and presumed to have a less-than-significant transportation impact under CEQA.

As described above, LOS is no longer an acceptable measure of environmental transportation impacts under CEQA, and VMT is the required evaluation metric. Consistent with the County's adopted VMT Guidelines and Local CEQA Procedures Manual, the Proposed Project qualifies for VMT screening and is therefore presumed to have a less-than-significant impact. However, as articulated above, even if the LOS metric is applied, the FCPCMP would not have any impact beyond what was previously identified in Final EIR 588.

All transportation-related mitigation measures from Final EIR 588 remain applicable and enforceable. No new or more severe transportation impacts would occur, and no additional mitigation is required.

Conclusion and Determination: The Proposed Project would not result in any increase in VMT and instead would decrease heavy-truck activity associated with landfill operations, consistent

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

with the projected closure conditions described and analyzed in Final EIR 588. Disposal related truck traffic would permanently cease following landfill closure. During the interim post-closure settlement period, traffic would be limited to maintenance and monitoring activities and soil import. During final closure construction, truck trips would temporarily increase due to delivery of final cover materials and construction support, resulting in temporary construction-related traffic and heavy equipment activity which would permanently cease following the completion of final closure construction. However, VMT would be significantly reduced from the current vehicle trips associated with active landfill operations. VMT would thereafter be substantially reduced during post-closure maintenance and activities described for continuation of the Valencia Greenery and MR activities. All of these traffic volumes and traffic impacts are consistent with what is described and analyzed in Final EIR 588 and its addenda, as well as in the MND for the Valencia Greenery. Therefore, implementation of the FCPCMP is consistent with the less than significant LOS impact conclusion reached in Final EIR 588 and is presumed to be less than significant for purposes of VMT analysis under the County's Guidance and adopted thresholds of significance for VMT.

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project would eliminate daily refuse-hauling trips to the Olinda Alpha Landfill upon closure, with routine municipal solid waste diverted to OC Waste & Recycling's remaining active landfills, and would reduce long-term on-site truck traffic and employee commute trips over time, with only temporary increases associated with closure construction and limited, periodic traffic during post-closure monitoring and maintenance. The Proposed Project is therefore in compliance with CEQA Guidelines CEQA Guidelines §15162 and §15164 and therefore a subsequent or supplemental EIR is not required.

2.19 Tribal Cultural Resources

Final EIR 588 Findings: Final EIR 588 was certified in 2007, prior to the 2015 amendments to the CEQA Guidelines that established *Tribal Cultural Resources* (TCRs) as a distinct environmental category (PRC §21074). At the time, potential tribal and archaeological resources were analyzed together under *Cultural Resources*. That analysis concluded that the Olinda Alpha Landfill site and surrounding area had been substantially disturbed by grading, mining, and landfill development prior to the Final EIR 588 and that no known archaeological, paleontological, or historical resources were present on site.

Subsequent Addenda Findings: Addendum No. 6 to Final EIR 588 (certified 2020) applied the new CEQA Guidelines for Tribal Cultural Resources and acknowledged that "when Final EIR 588 was certified, an analysis of tribal cultural resources was not required by CEQA," and confirmed that all areas of the landfill at issue in Addendum No. 6 to Final EIR 588 had been previously disturbed. Addendum No. 6 further stated that the proposed revision would not result in new ground disturbance and that OC Waste & Recycling would continue to implement previously adopted cultural-resource mitigation measures C1 and C2 to avoid inadvertent impacts. No tribes requested consultation during circulation of that Addendum.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

Proposed Project Changes: The proposed FCPCMP does not expand the landfill footprint or require new excavation in undisturbed areas. All closure and post-closure activities—installation of the final cover, drainage improvements, and long-term maintenance—would occur entirely within previously graded and filled areas. Therefore, the potential for encountering undiscovered tribal resources remains very low. OC Waste & Recycling would continue to apply inadvertent-discovery protocols consistent with CEQA Guidelines §15064.5 and PRC §5097.98.

Conclusion and Mitigation: No Tribal Cultural Resource impacts would occur under the FCPCMP. No additional mitigation is required beyond the inadvertent discovery and consultation procedures already implemented which require that work cease in the vicinity of any unanticipated cultural, Tribal cultural, or paleontological resources encountered during ground-disturbing activities, that qualified specialists and appropriate Tribal representatives be notified and consulted, and that treatment and avoidance measures be implemented in accordance with applicable laws and prior CEQA commitments before work resumes. No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed. Upon cessation of solid waste disposal operations, overall facility tonnage will substantially decrease relative to baseline conditions.

Continuing Mitigation Measures (from Final EIR 588):

- CR-1: During all project site excavation and grading, the project contractors shall immediately stop work in the area until the County can retain a qualified archaeologist and the nature, and significance of the find are determined.

- CR-2: If human remains are encountered during project construction, the contractor shall immediately stop working in the area. The County Coroner must be notified immediately. If the remains are determined to be prehistoric, the Coroner would notify the Native American Heritage Commission and take appropriate actions.

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any change to the significance conclusion for this environmental topic as analyzed in Final EIR 588 and Addendum No. 6 because the Proposed Project does not expand the landfill footprint into previously undisturbed areas, does not introduce new ground-disturbing activities beyond areas previously evaluated, and would continue to implement applicable Tribal consultation commitments and inadvertent discovery procedures established through prior CEQA approvals. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164 and therefore a subsequent or supplemental EIR is not required.

2.20 Utilities and Service Systems

Final EIR 588 Findings: Final EIR 588 determined that adequate utility infrastructure—including water supply, electricity, communications, and wastewater and storm-drainage facilities—was available to support landfill operations. The EIR found that solid-waste handling was part of the regional integrated system managed by OC Waste & Recycling and that landfill operations would not require expansion of off-site utility systems. The EIR also concluded that the site's

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

leachate collection, gas-recovery, and storm-drain systems would prevent impacts to public utilities and would be maintained in compliance with SA-RWQCB and SCAQMD requirements, and therefore the utility and service system impacts would be less than significant with no mitigation required.

Proposed Project Changes: Under the FCPCMP, all existing utilities that serve the landfill would remain in place and continue to function under existing capacities and permits. No new utility connections or off-site service extensions are required. During closure, existing utility systems would be maintained and modified only as necessary to support final cover construction and long-term environmental control systems, including landfill gas collection and control, leachate management, and stormwater drainage. Such modifications would be limited to minor adjustments to existing power, water, and conveyance infrastructure needed to support construction activities and long-term monitoring and control functions and would not involve extension of utilities to new areas, expansion of service capacity, or installation of new utility systems to serve new land uses.

Following closure, the landfill would continue to operate self-contained systems for leachate collection, landfill-gas control, and groundwater monitoring. Power and water use would decline significantly due to reduced equipment operation and staffing. The continued operation of the MR activities and composting facility would use existing utilities and would not increase demand beyond levels analyzed in Final EIR 588.

Conclusion and Mitigation: No utilities or service-systems impacts would occur under the FCPCMP. No mitigation is required because the Proposed Project would not result in significant impacts to utilities and service systems. No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed, and in fact, would decrease substantially relative to baseline conditions with the closure of the landfill, thereby decreasing the landfill's demand on existing utility and service systems.

On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any changes to the significance conclusion for this environmental topic as analyzed in Final EIR 588 because the Proposed Project does not include new residential or commercial development that would increase demand for water supply, wastewater treatment, or solid waste disposal capacity, and because closure and post-closure conditions would reduce daily operational demands for utilities over time compared to active landfill operations, with utilities usage limited primarily to monitoring, maintenance, and operation of required control systems. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164, and a subsequent or supplemental EIR is not required.

2.21 Wildfire

Final EIR 588 and Prior Treatment: When Final EIR 588 was certified in 2007, *Wildfire* was not a separate environmental topic under CEQA. At that time, wildfire risk was evaluated under Hazards and Hazardous Materials (with supporting discussion under Biological Resources**)** in Appendix G to the CEQA Guidelines. The analysis concluded that with the implementation of

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

fire-prevention measures, fuel-modification zones, and coordination with the OCFA, the landfill would not result in a significant wildfire hazard.

The *Wildfire* topic was formally added to the CEQA Appendix G Environmental Checklist in December 2018, following adoption of the State Clearinghouse and CEQA Guidelines Update (California Natural Resources Agency, effective December 28, 2018)**.** This amendment established *Wildfire* as an independent category in response to Senate Bill 1241 (2012) and increasing statewide emphasis on fire resilience in land-use planning.

Addenda Reference: Addendum No. 6 to Final EIR 588 (**Appendix B**) reaffirmed that existing hazard-management and vegetation-control measures would continue during operation and closure and did not identify new fire risks associated with extending the landfill closure date. The Addendum did not include a stand-alone *Wildfire* section but acknowledged that the landfill remained subject to ongoing fire-prevention and vegetation-management requirements under OCFA oversight.

Proposed Project Changes: The proposed FCPCMP does not expand the landfill boundary or create new ignition sources. Closure activities, including final cover installation and slope stabilization, would reduce long-term fire risk by installing a final cover with native landscaping.

Since the certification of Final EIR 588, statewide wildfire-management standards have evolved, including CAL FIRE's updated Fire Hazard Severity Zone (FHSZ) maps (2022–2024) and OCFA's revised fuel-modification and vegetation-management guidelines. OC Waste & Recycling would continue to coordinate with OCFA, CAL FIRE, and the City of Brea to ensure compliance with current wildfire-prevention policies and defensible-space requirements.

As part of the FCPCMP, OC Waste & Recycling would maintain and update fuel-modification zones, conduct annual trimming and mowing of grasses and vegetation, and clear dead or overgrown material—particularly adjacent to access roads, drainage features, and perimeter slopes. These measures would ensure consistency with state and local fire-prevention regulations and provide ongoing protection for adjacent open-space and residential areas, consistent with OC Waste & Recycling's legal obligations regardless of whether the FCPCMP is implemented

Conclusion and Mitigation: No wildfire impacts would occur under the FCPCMP. The Proposed Project continues to implement comprehensive fire-prevention and vegetation-management programs consistent with updated state and local wildfire-safety standards. No mitigation is required because the Proposed Project would not result in significant impacts to utilities and service systems No changes to maximum permitted daily tonnage, landfill footprint, or maximum permitted elevation are proposed. Following the cessation of solid waste disposal operations, facility tonnage will substantially decrease relative to baseline conditions.

On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP would not result in any change to this significance conclusion for this topic as analyzed in Final EIR 588 because the Proposed Project does not introduce new residential or other sensitive uses into wildfire hazard areas, does not expand the landfill footprint into

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

undeveloped wildland areas, and would replace active working faces with final graded slopes and long-term revegetation that reduce exposed, unmanaged surfaces, while continuing to implement fire prevention, vegetation management, and emergency access measures consistent with applicable fire authority requirements.. The Proposed Project is therefore in compliance with CEQA Guidelines §15162 and §15164, and a subsequent or supplemental EIR is not required.

2.22 Growth Inducing Impacts

Final EIR 588 and Prior Treatment: Final EIR 588 included a discussion of potential growth-inducing impacts in accordance with CEQA Guidelines §15126.2(d) and concluded that development and operation of the Olinda Alpha Landfill would not foster population growth or extend infrastructure that could encourage new development.

Proposed Project Changes: The proposed FCPCMP does not involve construction of new access roads, utilities, or other public infrastructure that could remove obstacles to growth or facilitate additional development. Rather, closure activities would reduce truck traffic, energy use, and active operational intensity and would shift the County's existing streams of solid waste disposal away from Olinda Alpha landfill to other existing, operational landfills within their existing, permitted capacities The Proposed Project would not directly or indirectly induce population, housing, or economic growth in the surrounding area, such as by extending new roadway, water, sewer, or utility infrastructure; increasing developable land area; or introducing new land uses that would stimulate residential or commercial development, and no new growth-inducing impacts would occur.

Conclusion and Mitigation: On the basis of substantial evidence in light of the whole record, the implementation of the FCPCMP would not result in any change to this significance conclusion growth inducing impacts as analyzed in Final EIR 588 because the Proposed Project does not extend new infrastructure, does not increase landfill capacity or introduce new development potential, does not remove constraints to growth, and does not provide new public services or utilities that would facilitate population growth or additional development beyond conditions previously evaluated. The Proposed Project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent or supplemental EIR is not required.

2.23 Cumulative Impacts

Final EIR 588 and Prior Treatment: Final EIR 588 evaluated the cumulative impacts of the Olinda Alpha Landfill in combination with other past, present, and reasonably foreseeable projects in the region and determined that, with implementation of adopted mitigation measures, the landfill's contribution to cumulative effects would not be cumulatively considerable.

Proposed Project Changes: The proposed FCPCMP does not expand the landfill footprint, increase capacity, or introduce new operational activities; instead, it represents the final phase of landfill operation and transition to long-term maintenance. As described above, the FCPCMP does not introduce new or worsen any previously identified significant impacts as set forth in Final EIR 588 and its addenda. Given that there are no new or more severe significant impacts, the FCPCMP would not generate any new or cumulatively considerable contribution to

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

previously identified cumulative impacts, and no additional mitigation beyond what was identified in Final EIR 588 and its addenda is required.

Conclusion and Mitigation: On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any changes to this significance conclusion for this environmental topic as analyzed in Final EIR 588. The Proposed Project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent or supplemental EIR is not required because implementation of the FCPCMP would not introduce new or more severe project-specific impacts, would not incrementally contribute to cumulative impacts beyond the levels previously analyzed in Final EIR 588, and would not change the intensity, geographic scope, or nature of landfill operations in a manner that would combine with other past, present, or reasonably foreseeable projects to result in new significant cumulative effects.

2.24 Irreversible and Irretrievable Commitment of Resources

Final EIR 588 and Prior Treatment: Final EIR 588 evaluated the irreversible and irretrievable commitment of resources associated with landfill construction, operation, and ultimate closure, concluding that such commitments were inherent to landfill development and long-term solid waste management.

Proposed Project Changes: The proposed FCPCMP would not require additional material, energy, or land resources beyond those previously authorized and analyzed as part of the closure and post-closure activities contemplated in Final EIR 588. Final EIR 588 evaluated closure-related activities including installing final cover to landfill slopes, installation of the final cover system (including low-permeability layers and protective soil cover), construction and long-term operation of landfill gas collection and control systems, continued leachate collection and management, installation and maintenance of stormwater drainage and erosion control features, and long-term revegetation and habitat restoration of closed landfill surfaces. These closure and post-closure activities overlap with and form the basis for the FCPCMP being considered under Proposed Addendum No. 10 and do not represent new or intensified actions beyond those previously analyzed. There are no changes proposed to the maximum permitted daily tonnage, the permitted area of the landfill, the maximum permitted elevation or depth, or the total design capacity. Following the cessation of solid waste disposal operations, facility tonnage will substantially decrease relative to baseline conditions.

Consistent with the analysis in Final EIR 588, closure activities would reduce ongoing fuel use, vehicle trips, and daily operational intensity associated with active waste disposal, while post-closure maintenance would focus on environmental protection and resource conservation through continued operation of landfill gas control, leachate management, stormwater systems, slope maintenance, and monitoring. Therefore, implementation of the FCPCMP would not result in new irreversible or irretrievable commitments of resources beyond those already evaluated in Final EIR 588, and no new or substantially worsened impacts related to irreversible and irretrievable commitments of resources would occur.

Conclusion and Mitigation: On the basis of substantial evidence in light of the whole record, implementation of the FCPCMP would not result in any changes to this significance conclusion

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

for irreversible and irretrievable commitment of resources as analyzed in Final EIR 588 because the Proposed Project does not expand the landfill footprint, does not increase permitted disposal capacity, does not introduce new permanent land disturbances, and implements closure and post-closure activities that were previously evaluated and contemplated in Final EIR 588 and that reduce long-term operational resource consumption compared to active landfill operations. The Proposed Project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and therefore a subsequent or supplemental EIR is not required.

2.25 Basis for Addendum

Pursuant to §15164 of the State CEQA Guidelines, a lead agency may prepare an Addendum to a previously certified Environmental Impact Report (EIR) when only minor technical changes or additions are necessary and none of the conditions described in §15162—which would require preparation of a subsequent or supplemental EIR—are present. This Addendum evaluates the FCPCMP for the Olinda Alpha Landfill and determines whether the proposed actions would result in any new or more severe environmental impacts compared to those analyzed in Final EIR 588.

Final EIR 588, certified by the Orange County Board of Supervisors in 2007, evaluated the full operation and ultimate closure of the Olinda Alpha Landfill and established mitigation measures for all potentially significant impacts. Since certification, several Addenda (No. 1 through 9) have been prepared to document minor modifications, including operational updates, schedule extensions, and technical refinements—each confirming that the proposed changes would not result in new or more severe environmental effects.

The proposed FCPCMP provides for final landfill closure, installation of an engineered cover, long-term maintenance of storm water and landfill-gas systems, and continuation of the existing MR activities and composting facility. All work remains entirely within the previously approved landfill footprint and does not increase the maximum daily permitted tonnage, permitted elevation, or total disposal capacity. Upon cessation of solid waste disposal operations, facility tonnage will substantially decrease relative to baseline conditions.

As demonstrated in the analyses presented in Sections 2.1 through 2.24 of this Addendum, implementation of the FCPCMP would not create new significant environmental effects, substantially increase the severity of previously identified impacts, or require new mitigation measures beyond those adopted in Final EIR 588 and its Mitigation Monitoring and Reporting Program (MMRP). The County of Orange, OC Wate & Recycling, as Lead Agency, has determined that the proposed activities are consistent with the project evaluated in Final EIR 588 and the applicable mitigation program.

On the basis of substantial evidence in light of the whole record, and as discussed in the environmental analysis included above implementation of the FCPCMP for the Olinda Alpha Landfill would not result in any changes to the significance conclusions contained in Final EIR588 or result in a substantial increase in the severity of the significant environmental impacts previously identified in Final EIR588. Therefore, in compliance with §15162 and §15164 of the CEQA Guidelines, the preparation of a subsequent or supplemental EIR is not required.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

3.0 DETERMINATION UNDER CEQA GUIDELINES § 15162-15164

In accordance with CEQA and the State CEQA Guidelines (CCR., Title 14, §15162–15164)**,** OC Waste & Recycling has reviewed the FCPCMP for the Olinda Alpha Landfill in light of the information contained in Final Environmental Impact Report (EIR) 588 and its subsequent Addenda. The purpose of this review is to determine whether the proposed FCPCMP would result in new significant environmental effects, a substantial increase in the severity of previously identified significant effects or require major revisions to the certified Final EIR 588.

§15162 of the State CEQA Guidelines specifies that a lead agency must prepare a subsequent EIR or Negative Declaration only when substantial changes to the project, new circumstances, or new information of substantial importance would result in new or more severe significant effects. §15163 allows preparation of a supplemental EIR when minor additions or changes are necessary to make the previous EIR adequate for the revised project. §15164 provides that a lead agency may prepare an Addendum to a previously certified EIR when only minor technical changes or additions are necessary and none of the conditions described in §15162 are present. Because Final EIR 588 functions as a Program EIR for ongoing landfill operations consistent with §15168, later activities such as closure and post-closure maintenance may be tiered from that document if they remain within its evaluated scope.

Based on the analysis presented in this Proposed Addendum and the supporting technical record, OC WASTE & RECYCLING finds the following:

1. The FCPCMP does not propose changes that would result in new significant impacts not previously identified in Final EIR 588.
2. The FCPCMP does not involve new circumstances or conditions that would substantially increase the severity of previously identified impacts.
3. The FCPCMP does not require new or substantially different mitigation measures beyond those already adopted in Final EIR 588 and carried forward through this Proposed Addendum.

All project activities would occur within the existing permitted landfill footprint, involve no expansion of the site or operational capacity, and represent the final phase of closure consistent with existing regulatory approvals. The project continues to comply with all adopted mitigation measures, monitoring commitments, and permit conditions established under Final EIR 588 and its Mitigation Monitoring and Reporting Program (MMRP).

Therefore, pursuant to CEQA Guidelines §15162, 15163, and 15164, the County of Orange/OC Waste & Recycling, acting as Lead Agency, has determined that preparation of a subsequent or supplemental EIR is not required. This Proposed Addendum No. 10 to Final EIR 588 appropriately documents the environmental review for the FCPCMP for the Olinda Alpha Landfill and remains the proper CEQA document for the proposed action.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

4.0 MITIGATION MONITORING AND REPORTING PROGRAM (MMRP) SUMMARY

In accordance with §15097 of the State CEQA Guidelines**,** a Mitigation Monitoring and Reporting Program (MMRP) was adopted with the certification of Final EIR 588 by the Orange County Board of Supervisors in 2007**.** The MMRP established detailed procedures and responsibilities for implementing, monitoring, and verifying compliance with all mitigation measures identified in Final EIR 588 to ensure that potential environmental impacts remain below levels of significance.

Applicable mitigation measures adopted as part of Final EIR 588 continue to apply to the operation, closure, and post-closure maintenance of the Olinda Alpha Landfill. OC Waste & Recycling would continue to implement all applicable mitigation measures through its ongoing environmental compliance programs**,** agency reporting requirements, and coordination with responsible agencies, including the City of Brea, OCFA**,** the SA-RWQCB, LEA, and the SCAQMD. These measures ensure continued compliance with the environmental commitments and conditions of approval established in Final EIR 588 and its Mitigation Monitoring and Reporting Program. Monitoring and reporting responsibilities for each mitigation measure would remain with OC Waste & Recycling**,** ensuring that all mitigation conditions of Final EIR 588 and subsequent Addenda are maintained through the post-closure period. No new mitigation measures are required as part of this Proposed Addendum, consistent with the findings of §15162 and 15164 of the State CEQA Guidelines**.**

5.0 SUBMITTING COMMENTS

Pursuant to §15164(c) of the State CEQA Guidelines, an Addendum to a certified EIR is not subject to a formal public review period. However, OC Waste & Recycling provided an administrative review draft for review and comment to both the City of Brea and the LEA and responses to comments were provided to both agencies and revisions to the Addendum were completed. Additional comments, questions, or requests for additional information regarding this Proposed Addendum #10 to Final EIR 588 should be submitted to:

Leila Barker
CEQA and Habitat Program Manager
OC Waste & Recycling
601 N. Ross Street, 5th Floor
Santa Ana, CA 92701
Phone: (714) 834-4013
Email: OCWR-CEQAReview@ocwr.ocgov.com

All correspondence received will be included in the administrative record for this Proposed Addendum. OC Waste & Recycling will continue to coordinate with the City of Brea, the LEA, OCFA, the SA-RWQCB, and other applicable agencies to ensure consistency with existing permit conditions, the 2024 Brea Cooperative Agreement, and the mitigation measures adopted with Final EIR 588.

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

Certification

Based on the foregoing information and the analysis contained in this Proposed Addendum, the proposed FCPCMP for the Olinda Alpha Landfill does not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects analyzed in Final EIR 588.

Pursuant to CEQA and §15162 through §15164 of the State CEQA Guidelines, preparation of a subsequent or supplemental EIR is not required. This Proposed Addendum to Final EIR 588 has been reviewed and considered by OC Waste & Recycling prior to approval of the Proposed Project.

This Proposed Addendum, together with Final EIR 588 and its Mitigation Monitoring and Reporting Program, constitutes the environmental documentation for the FCPCMP for the Olinda Alpha Landfill.

DocuSigned by:
Tom Koutroulis
5681397E4B2E44E...

Tom Koutroulis, Director
OC Waste & Recycling
County of Orange, California

Date: 07/01/2026

Docusign Envelope ID: 2ABBC340-AB42-844F-8012-0E1C0304DBB1

References

County of Orange, OC Waste & Recycling. 2007. Final Environmental Impact Report 588, Olinda Alpha Landfill Implementation. Certified by the Orange County Board of Supervisors, April 17, 2007.

County of Orange, OC Waste & Recycling. 2010–2024. Addenda Nos. 1 through 9 to Final EIR 588, documenting operational updates, schedule extensions, and technical refinements at the Olinda Alpha Landfill.

County of Orange, OC Waste & Recycling. 2024. Addendum No. 10 to Final EIR 588, FCPCMP (this document).

County of Orange and City of Brea. 2024. Final Olinda Alpha Cooperative Agreement. Executed between the County of Orange and the City of Brea, July 2024.

OC Waste & Recycling. 2024. Olinda Alpha Landfill FCPCMP, prepared in coordination with the Local Enforcement Agency (LEA), Orange County Fire Authority (OCFA), Santa Ana Regional Water Quality Control Board (RWQCB), and the South Coast Air Quality Management District (SCAQMD).

South Coast Air Quality Management District (SCAQMD). 2019. South Coast Air Quality Management Plan.

California Natural Resources Agency. 2023. California Environmental Quality Act (CEQA) Guidelines, California Code of Regulations, Title 14, §15000–15387.