



September 13, 2021

Governor's Office of Planning & Research

September 14 2021

Aimee Halligan
Orange County Waste & Recycling
32250 La Pata Avenue
San Juan Capistrano, CA 92675

STATE CLEARINGHOUSE

Subject: SCH No. 1999041035 – Prima Deshecha General Development Plan - Zone 4
Construction Projects – Orange County (Facility No. 30-AB-0019)

Dear Ms. Halligan:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

Orange County Waste & Recycling (OCWR), acting as Lead Agency, has prepared and circulated a Draft Supplemental Environmental Impact Report (SEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The Prima Deshecha General Development Plan - Zone 4 Construction Projects (proposed project) is located at the Prima Deshecha Landfill (Landfill) which is owned by Orange County and operated by OCWR. OCWR is a county department that is overseen by the Orange County Board of Supervisors. The Prima Deshecha Landfill is 1,530 acres (ac) and is located in southeastern Orange County; partially within San Juan Capistrano (570 ac), San Clemente (133 ac), and unincorporated Orange County (827 ac). The landfill is located at 32250 Avenida La Pata, and access is provided by the Golden State Freeway (Interstate 5 [I-5]), Ortega Highway (State Route 74 [SR-74]), and Avenida La Pata. The Prima Deshecha Landfill site is divided into five zones, called Zones 1 through 5. Zone 1 is the current landfilling area, with an estimated closure date of approximately 2050. Zone 4 is the future landfill development area, with an estimated closure date of approximately 2102.

The proposed Project includes the following components:

1. Changes to the phasing of operations between Zone 1 and Zone 4 of the Landfill to allow for concurrent operations;

2. Blasting, excavation, on-site relocation, pulverizing into soil, soil stockpiling and off-site soil removal of hard rock material in Zone 4, referred to as the San Onofre Breccia area; and
3. Imported soil trips for liner installation that will occur for all future Zone 4 development phases.

COMMENTS

Solid Waste Regulatory Oversight

Per the currently issued April 19, 2019 Solid Waste Facility Permit, Page 4, Section 17. Local Enforcement Agency Conditions, subsection Permitting, letter g., “The facility operator shall submit an application to the LEA at least one hundred eighty (180) calendar days prior to implementing design and/or operational change(s) that require amendment(s) to the JTD, as determined by the LEA based on 27 CCR Section 21665(c)...Examples where JTD amendment may be required include, but not limited to, changes in: fill sequence of permitted phases that will not result in a change in closure date of either Zone 1 or Zone 4; environmental control systems; ancillary facilities; facility security; staffing requirements; waste-handling procedures; and control measures for dust, birds, vectors, litter, noise, etc.”

The Orange County Environmental Health Division, Local Enforcement Agency (LEA) is responsible for providing regulatory oversight of solid waste handling and disposal activities, including inspections and permitting at the Prima Deshecha Landfill. Please contact the LEA, Kathy Cross, at 714.433.6270 or by e-mail at KCross@ochca.com to discuss solid waste regulatory requirements for the proposed project.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the Draft SEIR and hopes that this comment letter will be useful to the Lead Agency in preparing the Final SEIR and in carrying out their responsibilities in the CEQA process.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices, and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6363 or by e-mail at Megan.Emslander@calrecycle.ca.gov.

Draft SEIR for Prima Deshecha Landfill (30-AB-0019)

September 13, 2021

Page 3 of 3

Sincerely,



Megan Emslander, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Ben Escotto, Supervisor
Permitting & Assistance Branch – South Unit

Kathy Cross, Supervisor
Orange County LEA