Document: Addendum No. 1 to Mitigated Negative Declaration (MND) for the Capistrano Greenery Composting Operation at the Prima Deshecha Landfill

Project Name: **Addendum No. 1 to MND for Capistrano Greenery Composting Operation at the Prima Deshecha Landfill (SCH #2020019030) – Modifications to Capistrano Greenery Operations**

OC Waste & Recycling
CEQA Log #: 720

Subject and Purpose of Addendum

The purpose of this Addendum is to comply with the requirements of the California Environmental Quality Act (CEQA) by assessing the modification of the Capistrano Greenery Composting Operation at the Prima Deshecha Landfill (PDL) and determine whether modifications will result in meeting any of the conditions listed in CEQA Guidelines (Title 14, Division 6, Chapter 3 of the California Code of Regulations (CCR), Section 15162) that would warrant a subsequent Environmental Impact Report (EIR) or Negative Declaration; and ascertain if the modifications instead are appropriate to examine through an Addendum to an EIR or a Negative Declaration as described in CEQA Guidelines (Title 14, Division 6, Chapter 3 of the CCR, Section 15164).

PDL is a Class III landfill that only accepts municipal solid waste for disposal; no hazardous or liquid waste is accepted. The landfill, owned by the County of Orange and operated by Orange County Waste & Recycling (OCWR), is currently authorized to receive a maximum of up to 4,000 tons per day (TPD) of waste material. The 1,530-acre landfill is located at 32250 Avenida La Pata in San Juan Capistrano, unincorporated Orange County, and San Clemente. On May 5, 2020, the Orange County Board of Supervisors approved a Mitigated Negative Declaration (MND) (OCWR CEQA Log # 679, State Clearinghouse (SCH) #2020019030) for the construction and operation of a 204 TPD composting facility, called Capistrano Greenery at PDL.

The project analyzed in the 2020 MND included the construction and operation of a 204 TPD open windrow green waste composting facility on an 18.6-acre area of the western portion of Zone 1 of the landfill which is not being used for active landfilling. A paved pad base was placed over the entire area to store processed green material (PGM) and for all composting operations.

The facility currently accepts up to 204 TPD of pre-processed green and agricultural materials and manure. Green material includes but is not limited to tree and yard trimmings, untreated wood wastes, natural fiber product, wood waste from silviculture and manufacturing, and construction and demolition wood waste, and agricultural materials of plant origin. Arriving materials are already pre-processed (chipped and ground with contaminants removed) and consolidated at the material receiving area prior to deployment into windrows. During operations, compost piles are formed in windrows with dimensions no greater than 12 feet high, 20 feet wide and 100 feet in length. The existing operation consists of a material unloading area, composting area, curing area, screening area, finished product load out area, storm water pond and parking. The Capistrano

Greenery can accept a maximum of 204 TPD of processed green material (PGM), agricultural material and manure, with a maximum on-site volume of materials of approximately 77,000 cubic yards on-site at any given time. Under existing South Coast Air Quality Management District (SCAQMD) Rules 1133, 1133.1, 1133.2 and 1133.3 governing green waste and composting operations, green waste composting operations can receive up to 20% manure by volume. As such, the Capistrano Greenery currently accepts up to 40 TPD of manure for composting. Incoming PGM, agricultural material and manure are brought to the Capistrano Greenery and placed in a designated unloading area. The manure is mixed in with PGM and composted together, at a ratio of 10%-20% manure to PGM. The finished compost is delivered to end users located within and outside of Orange County.

Heavy equipment associated with the 204 TPD composting operation include a windrow turner, two front loaders, a mobile screen, a water truck, and a dump truck. Operation of this equipment for the purpose of composting was determined to result in an insignificant increase in air emissions when compared to the existing environmental setting of the heavy construction equipment (i.e., scrapers, compactor bulldozers, water trucks, etc.) and associated emissions for the active PDL.

The landfill operation currently uses both potable and reclaimed water as follows:

- Reclaimed water usage for landfill operations is approximately 50,000 gallons per day.
- Potable water is used for the landfill administrative building and crew quarters and for habitat mitigation areas. The bulk of current potable water use is for the habitat mitigation areas. Current potable water consumption for the landfill is approximately 133,000 gallons per day.

The Capistrano Greenery Composting Facility at 204 TPD uses both potable water and a minor amount of reclaimed water as follows:

- At its current operation of 204 TPD, the Capistrano Greenery uses approximately 122,000 gallons of potable water per day for moistening the compost piles and for dust control.
- Stormwater collected in the facility's on-site stormwater basin is re-used on compost piles, however the volume/rate of this is sporadic and varies greatly. The volume of reclaimed water is also dependent on the water level in the basin, number of piles present, and weather conditions. This reclaimed water is currently not available on a daily basis and not calculated for that reason, and it is assumed that the maximum daily water usage at the site is predominately potable water.

Utilizing the information above, the landfill operation uses approximately 133,000 gallons of potable water and the Capistrano Greenery uses approximately 122,000 gallons of potable water; altogether, the composting operation and the landfill currently use approximately 255,000 gallons of potable water per day.

The Capistrano Greenery maintains the same hours of operation as the landfill – Monday through Saturday, 7 AM – 5 PM, and is closed on Sundays and for six major holidays each year (New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day). No materials receipt occurs on Sundays, although other operations such as pile monitoring and management activities may take place.

The purpose of this Addendum No. 1 is to document changes and operational modifications to the existing Capistrano Greenery (Figure 1 Project Vicinity and Figure 2 Site Map), hereafter cumulatively referred to "operational modifications", or "Phase 1B" which consists of the following:

- The existing facility is permitted for 204 TPD and receives feedstock six days per week. The proposed operation will increase the daily tonnage of the composting facility to 536 TPD but will operate under the same conditions and maintain the maximum on-site volume of materials of approximately 77,000 cubic yards on-site at any given time, consistent with the existing operation.

- Expand the list of feedstock materials to include food waste as a permissible primary feedstock (in addition to the existing primary green material feedstock) and up to 20% by volume of manure. OCWR currently receives uncontaminated PGM as the primary feedstock material and can also receive up to 40 tons of horse manure per day. OCWR plans on accepting food waste in addition to the existing green material as the primary feedstock, at a maximum of 5,000 tons per year. 536 TPD will be the daily maximum including all feedstock types. Per South Coast Air Quality Management District (SCAQMD) Rule 1133.3, a composting facility can accept up to 5,000 tons per year of food waste and still be considered a green waste composting facility without further authorization or regulatory requirements from the SCAQMD. The existing Capistrano Greenery facility permits and supporting documents with CalRecycle/Local Enforcement Agency (LEA) and San Diego Regional Water Quality Control Board (SDRWQCB) will need to be revised to allow the acceptance of food waste.

- The Capistrano Greenery is currently permitted to accept up to 40 TPD of manure for composting. With a proposed increase in daily incoming tonnage to 536 TPD, OCWR will also be able to accept an increased amount of manure. In accordance with SCAQMD Rule 1133.2, up to 20% of manure by volume can be accepted per pile by composting operations and still be considered a green waste processing facility without further authorization or regulatory requirements from the SCAQMD; therefore, at a maximum tonnage rate of 536 TPD for all feedstock types, Capistrano Greenery will be able to accept up to a maximum of 107 TPD of manure and remain in compliance with SCAQMD rules and its existing permits.

- Expand the facility by approximately 6.2 acres for a total of 24.8 acres (Figure 3). The Capistrano Greenery is currently permitted to operate on 18.6 acres which includes the composting area, the access roads, and other associated operations. The proposed modification will expand the facility by approximately 6.2 acres to primarily include the slopes adjacent to the greenery facility. No feedstock, composting, or curing of compost materials will occur within the added area. This area may be used for the storage of inert materials, equipment, or appurtenant permitted activities. The additional acreage is located on previously disturbed landfill area and the slopes of the exiting greenery. The entirety of the expanded Capistrano Greenery will remain within the PDL property and will be located on previously impacted landfill areas.

- Allow for chipping and grinding activities to be performed on-site within the Capistrano Greenery area as well as within the confines of the operating landfill within a buffer zone (Figure 4). New equipment for this processing operation includes a chipper/grinder and two (2) conveyors. This will allow OCWR to comply with SB 1383 regulations by processing and managing unprocessed organic waste materials coming into the landfill, primarily by self-haulers, that would otherwise be disposed of. The existing Capistrano Greenery facility permits and supporting documents with CalRecycle/Local Enforcement Agency (LEA) will need to be revised to allow for chipping and grinding activities within the Greenery and within the larger footprint of the landfill.

- Utilization of new, improved composting technologies and processing methods, namely, Covered Aerated Static Pile (CASP) composting. The Capistrano Greenery currently utilizes open windrow composting as the primary means to compost feedstock. As the demand grows for compost production and as OCWR expands feedstock materials beyond green materials, other technologies need to be considered with for purposes of operational efficiency and maximization of processed tonnage with space constraints. OCWR is considering other technologies to better accommodate these changes. The CASP technology utilizes a tarp system equipped with a blower to induce forced aeration for the Process to Further Reduce Pathogens (PFRP) while also serving as an emission control technology under SCAQMD rules. CASP technology can reduce the PFRP timeframe, conserve water, reduce odors, and reduce vectors as compared to open air windrow composting. OCWR will utilize the CASP system technology in addition to traditional open-air windrow composting at Capistrano Greenery. However, open windrow will continue only in the previously permitted quantities. The CASP system will use a mechanical cover winder to apply and remove the covers from the compost piles, therefore new equipment added for the operation will include 2 mechanical cover winders. Use of CASP will increase the volume of compost the facility can process, reduce water use, and increase environmental controls for the process.

- Construct a standalone solar panel field and related electrical storage devices to power the expanded operation (Figure 5). There is no power source in the vicinity of the Capistrano Greenery, so a photovoltaic field will be included as part of the proposed project. The solar field will encompass less than two (2) acres in a nearby area to the composting operation to generate the required electrical demands. Placement of the solar field and associated piping will be located on previously disturbed areas of the landfill. Batteries will be utilized for electrical storage and backup for the facility. The solar field will provide 480 volt, three-phase power for provision to the vendor supplied battery power mechanical winder, the blowers, and the control panel. Underground piping will connect the solar field with the Capistrano Greenery. The CASP system instrumentation will be connected to a central control panel that will allow for user adjustment on pile operation and management as well as a remote connection. The entire system and central control panel will be powered by the solar field with battery storage designed for 24-hour operation even during periods of low sunlight.

- Allow for public compost give-away events. The Capistrano Greenery produces finished compost material, and most of the product will be hauled off-site for beneficial reuse.

Occasionally, OCWR may sponsor community compost give away events for local businesses and residents, anticipated to occur at a maximum of once per month. In addition, OCWR may make compost available for public pick up by request. These events will offer free compost to interested members of the public, provide an opportunity to educate the community on the benefits of composting, and support the state's goal to recycle organic materials and conserve landfill capacity, as articulated in Senate Bill (SB) 1383, Assembly Bill (AB) 1594, and AB 939[1]. During the compost give-away events, the finished composting material will be placed close to the entrance of the landfill property so that the public can easily have access to it for pick-up. OCWR is also proposing to use other locations within the landfill close to the entrance butwithin the existing landfill propertyfor interim use for temporary compost giveaway events. Any proposed new locations will be subject to LEA approval. OCWR may usea bagging machine to bag the compost as a cleaner and easier giveaway option.

Standards for Preparing an Addendum

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

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

[. . .]

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

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

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

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

(a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

[1]SB 1383 is a statewide effort to reduce emissions of short-lived climate pollutants (SLCP) by reducing organic waste disposal to 50% by 2020 and 75% by 2025. AB) 1594 mandates that as of 1/1/2020, the use of green material as alternative daily cover (ADC) will no longer constitute diversion through recycling and will instead be considered disposal. AB 939 requires each jurisdiction in California to divert at least 50% of its waste stream away from landfills either through waste reduction, recycling or other means.

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

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

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative."

Changes to MND for Capistrano Composting Operation at the Prima Deshecha Landfill

Changes to MND for the Capistrano Greenery Composting Operation MND-Initial Study Sections 1.5 and 1.6 are required, as shown below, with added text shown in underline, and removed text in ~~strikeout~~.

1.5 Project Need

The implementation of the expanded operation of the Capistrano Greenery Composting Operation at the Prima Deshecha Landfill will allow OCWR to compost a maximum of ~~204~~ 536 TPD of feedstock to include food waste in addition to the existing green material as well as expand acceptance of manure, thereby assisting the state, Orange County cities and the County in meeting SB 1383 and AB 1594 requirements for organic waste recycling.

1.6 Project Description – *Proposed Project – Capistrano Greenery*

As part of the proposed project, OCWR will implement various operational modifications to the Capistrano Greenery Composting Operation to improve compliance with SB 1383 and AB 1594. These changes include increasing the maximum daily tonnage received at the facility from 204 TPD up to 536 TPD of incoming feedstock including food waste and manure (note that due to the increase in daily tonnage, a proportional increase in acceptance of manure, which is already permitted, will also occur); use of additional feedstock materials (food waste); expansion of the facility by approximately 6.2 acres to a total maximum of 24.8 acres to incorporate the existing facility side slopes in the permitted facility footprint; permit chipping and grinding activities on-site; utilization of new composting technologies and processing methods to streamline the process, reduce processing times, increase throughput, and reduce environmental impacts; add stand-alone solar to power new composting technologies; and allow for compost give away events. These proposed modifications are described in further detail below:

Feedstock: Expand feedstock to include food waste and expand volume of manure accepted. As the demand grows for compost production to meet organics recycling requirements set by SB 1383 and AB 1594, OCWR is proposing to add additional feedstock types to composting operations, including food waste, materials from on-site chip and grind operations; and expanding acceptance of manure along with green waste material which is the primary feedstock. Orange County has a number of equestrian communities that generate horse manure, which is already permitted to be accepted at 20% by volume of the existing daily maximum at Capistrano Greenery. Acceptance of this material at Capistrano Greenery offers a solution other than landfilling for manure to help meet organics diversion requirements set by SB 1383. In accordance with SCAQMD Rule 1133.2, up to 20% of manure by volume can be accepted per pile by a composting operation and still be considered a green waste processing facility without further SCAQMD permits and emission control technology requirements; therefore, at a maximum tonnage rate of 536 TPD inclusive of all incoming feedstock types, Capistrano Greenery can increase acceptance of manure up to 107 TPD and remain in compliance with SCAQMD rules and its existing permits. In addition, per SCAQMD Rule 1133.3, a facility can accept up to 5,000 tons per year of food waste and still be considered a green waste composting facility without further SCAQMD permits/emission control technology requirements; additional quantities would require additional permitting. The facility permits and supporting documents with Cal Recycle/LEA and San Diego Regional Water Quality Control Board (SDRWQCB) for Capistrano Greenery will need to be revised to allow for the acceptance of food waste.

Facility Acreage: Phase 1A, the current phase of the existing Capistrano Greenery composting facility, is permitted to operate on an 18.6-acre pad that includes the all-weather surface for receipt and handling of feedstock, active composting, curing, and storage of finished product and ancillary infrastructure such as a stormwater retention basin, fire prevention water lines, fire hydrants, fire lanes, water tanks and source points, and equipment storage. In Phase 1B, the operation will be expanded by approximately 6.2 acres to incorporate the side slopes of the composting operation, which are located immediately adjacent to the existing facility, into the permitted facility footprint (Figure 3). This additional acreage will provide for additional area to potentially store equipment, materials, and supplies associated with the facility. Only finished compost or inert materials may

be stored in this expanded area, and no feedstock, composting, or curing of compost materials will occur within the slopes. The expanded acreage will bring the total facility acreage to 24.8 acres. The entirety of this increased acreage is within the property of the existing landfill and is on previously disturbed landfill areas that are not currently being utilized for landfilling activities. The slopes to be added drain away from the composting pad, except for the northern slope which drains towards the greenery. Minimal grading will be required to all the slopes that are proposed for inclusion in the expanded Greenery to facilitate appropriate drainage.

Chipping and Grinding: Chipping and grinding is an inherent aspect of a green materials composting operation. Most facilities chip and grind green waste prior to placement in windrows. For Phase 1A of the existing Capistrano Greenery, the green material arrives pre-processed which allows the feedstock to be immediately placed in windrows. Through composting the green material is further reduced in size through microbial degradation. The finished compost is then screened to meet product specifications which results in the generation of oversize particles referred to as "overs." The overs can be further composted or converted to a mulch product which requires the overs materials to be mechanically reduced in size through chipping and grinding. As OCWR expands its resource recovery activities, permitting chipping and grinding on-site and within the larger footprint of the existing landfill within a buffer zone (Figure 4) will allow organic material coming from the general public that is not pre-processed to be removed from the waste stream to be further chipped and ground down for either composting operations or to produce mulch. New equipment for this processing operation would include a chipper/grinder and two (2) conveyors to process materials on-site. All regulations pertaining to chipping and grinding operations as per Title 14, Section 17862.1 will be followed.

Utilization of new composting technologies: In the new Phase 1B, OCWR will utilize the latest composting technologies to streamline composting process, reduce processing times, increase potential throughput, and potentially reduce environmental impacts, namely, Covered Aerated Static Pile (CASP) technology. As the demand grows for compost production to meet organics recycling requirements pursuant to state regulations, and as OCWR expands feedstock materials beyond green materials, other technologies, such as CASP technology, need to be considered to meet demand and increase the efficiency of the Capistrano Greenery Composting Operation.

CASP technology utilizes a tarp system equipped with a blower to induce forced aeration for the Process to Further Reduce Pathogens (PFRP) while also serving as an emission control technology under SCAQMD rules. CASP technology has the ability to reduce the PFRP timeframe, conserve water, reduce odors, and reduce vectors as compared to open air windrow composting. Phase 1A of Capistrano Greenery will continue to utilize open windrow composting as the primary means to compost feedstock. In Phase 1B, CASP system technology in addition to traditional open-air windrow composting will be implemented at the Capistrano Greenery.

For CASP technology the composting occurs in the aerated piles for a minimum of 8 weeks; the first 4 weeks (21-28 days) are the active composting phase, after which the curing phase occurs for a minimum of 4 weeks. During the active composting phase, the compost remains covered and is then uncovered during the curing phase. Temperature is monitored through automated sensors throughout the entire process. When the phase is complete, the compost is moved to the pile designated for the next phase (i.e., moved from an active phase pile to a curing phase pile). Once

the compost completes a minimum of 21 days in the CASP active phase and meets the PFRP requirements, it will require a minimum of 28 days of curing before it can be stored or transported off-site. CASP composting requires careful monitoring to ensure that the outside of the pile heats up as much as the core.

The current design is a concrete bunker CASP system with 4-foot walls along the sides and a 14-foot-high push wall at the end of the pile. This system has piping located below ground which allows for not only the delivery of air into the compost but also collects liquid from the compost without co-mingling the compost leachate with storm water. Since the piping is below ground the compost can be loaded into and out of the bunker without having to move the air piping out of the way. The dimensions of the CASP bunkers will be 12 feet high, 26 feet wide and 150 feet long. There will be a total of 24 CASP bunkers on-site. Construction of the CASP system, including the bunkers, is tentatively expected to begin in summer 2025 and will continue for approximately 8 months. It is assumed that construction of the proposed project would require the use of one excavator, loader, dump truck, dozer and backhoe with concrete trucks delivering concrete and minor asphalt delivery.

The same heavy equipment used for open windrow composting would also be used for CASP composting. The CASP system will use a mechanical cover winder to apply and remove the covers from the compost piles, therefore new equipment added for the operation will include 2 mechanical cover winders.

Potable water will be utilized for the composting operations and obtained from existing infrastructure at the facility. Excess water applied to new piles (leachate) will be collected via pipes, collecting in (2) newly constructed above ground tanks on-site and reused on new piles as needed. Even at a higher maximum daily tonnage intake, it is anticipated that CASP composting operations will only require approximately 75,000 gallons of water per day for operation, resulting in an overall decrease in water usage as compared to the existing Phase 1A open windrow operation, which used approximately 122,000 gallons per day. The Phase 1A and 1B operations are sequential, and estimated water use is not cumulative between phases. Thus, Phase 1B CASP composting will result in an overall reduction in the daily water usage at the facility. A reduction of up to 47,000 gallons of water per day by implementing CASP in Phase 1B is estimated. OCWR is also exploring other water usage options to include utilizing reclaimed water and treated water from PDL condensate treatment system for the Capistrano Greenery usage. Approval from the SDRWQCB will be obtained for the reuse and will become part of the WDR permit for composting operations.

The Capistrano Greenery CASP system will be designed and operated to meet all Orange County Fire Authority (OCFA) requirements. This will include but not be limited to the spacing between CASP piles; the number, width, and length of fire lanes; and the distance of the CASP piles and material storage areas to flammable vegetation. In addition, the project already has fire hydrants in place. As for the current permitted activity, OCWR will provide an updated plot plan to OCFA for review and approval that contains the following information:

- A Fire Master Plan showing all driveways and parking areas constructed of all-weather surface roads with a minimum of 28 feet in width.
- Location of all water sources (fire hydrants).
- Location of all other hazards (i.e., flammable, combustible, or LPG tanks).

- Fuel modification plan.

To provide the required fire flow to the composting operation, the minimum fire flow shall be no less than 500 gallons per minute (GPM) at 20 Pounds per Square Inch Residual (PSIR) for a minimum of two (2) hour duration.

These modifications will require revisions to the existing facility permits and supporting documents with Cal Recycle/LEA and RWQCB and will also require submission to and approval by the SCAQMD.

Solar: Proposed modifications include the design of a standalone solar panel field and related electrical storage devices to power the proposed facility. There is no power source in the vicinity of the Capistrano Greenery, so a photovoltaic field will be included as part of the proposed project to power the CASP system. The solar field will be less than 2 acres and located near the composting area to generate the required electrical demands. Batteries will be utilized for electrical storage and backup for the facility. The solar field will provide 480 volt, three-phase power for provision to the vendor supplied battery power mechanical winder, the blowers, and the control panel. Underground piping along existing, previously disturbed lines and access roads will be trenched to connect the solar field to the Capistrano Greenery. The CASP system instrumentation will be connected to a central control panel that will allow for user adjustment on pile operation and management as well as a remote connection. The entire system and central control panel will be powered by a solar field with battery storage designed for 24-hour operation even during periods of low sunlight. The entirety of the solar system will be placed on previously disturbed landfill areas.

Compost Give Away: As Capistrano Greenery produces finished material, the majority of product will be hauled off-site for beneficial reuse. Occasionally, OCWR may sponsor community compost give away to local businesses and residents, anticipated to take place approximately a maximum of once a month. In addition, OCWR may make compost available for public pick up by request. These events will offer free compost to interested members of the public, provide an opportunity to educate the community on the benefits of composting, and support the state's goal to recycle organic materials and conserve landfill capacity as set forth in SB 1383 and AB 939. Finished compost for public pickup will be placed in an area close to the entrance of the landfill property so the public will have easy access to the finished compost for pick-up. No additional permitting is required to allow for this activity. OCWR is also proposing a former Materials Recovery Facility (MRF) area by the Household Hazardous Waste facility for interim use as a temporary location for compost giveaway. This proposed new location will be approved by the LEA. OCWR may using a bagging machine in the near future to bag the compost as a cleaner and easier giveaway option.

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

Included below is an analysis of whether an Addendum is the appropriate CEQA documentation for the modification of operations of the Capistrano Greenery Composting Operation located at the PDL. The following analysis summarizes the conclusions for each environmental topic analyzed in the Final MND for Capistrano Greenery Composting Operation at the PDL and

whether there would be a change in the significance conclusion for each environmental category as a result of the modified project.

Aesthetics

The original MND for the Capistrano Greenery Composting Operation resulted in less than significant impacts to scenic vistas, did not substantially damage scenic resources, or degrade the existing visual character or quality of public views of the facility and its surroundings, and did not create a new source of substantial light or glare. The composting operation is near the southwest corner of the PDL and is lower than the sounding hills and adjacent ridgeline, making it difficult to see outside of the PDL. The height of the composting rows (12 feet high maximum) does not exceed the height of adjacent hills and ridges to the north and west from the project site. To the east, the compost piles would not be visible due to an adjacent ridgeline that separates the landfill from nearby homes. The only possible areas that anyone is able to see the Capistrano Greenery and the new solar facility is from locations to the south in Forster Ranch. However, LSA conducted viewshed analysis as part of the original MND and concluded that the operation is not visible from the most likely receptors to the south, which are both just over 1 mile away. Due to the distance and the small height of the composting rows, there would be a less than significant impact to likely receptors. Piping connecting the new solar facility with the greenery will be underground and therefore not visible.

The proposed operational modifications to the Capistrano Greenery do not include the development of any new structures. Views of the facility will remain substantially the same as the existing operation and will result in no change from the visual character of the facility which includes an existing, active composting operation. Operational hours will remain the same. As such, proposed modifications would result in less than significant impacts to the existing aesthetics or views of the area, which already includes an existing, active landfill. The modifications to the operation will also not incorporate any new or additional artificial lighting, resulting in no change to the significance determination in this resource category. No scenic highways or vistas are within the project area. Conclusions remain the same as in the approved MND. The proposed modification of operations at the Capistrano Greenery results in less than significant impacts to aesthetics.

Based on the above evidence, the modifications of operations at the Capistrano Greenery Composting Operation will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Agriculture & Forestry Resources

The original MND for the Capistrano Greenery Composting Operation concluded that the project resulted in no impacts to agriculture and forestry resources, as the project is located within an existing landfill, and does not affect Farmlands listed as “Prime”, “Unique” or of “Statewide Importance” as shown on the State Farmland Mapping and Monitoring Program, nor conflict with Williamson Act contracts nor does it involve the conversion of farmlands to a non-agricultural use. The proposed project also does not result in any conflicts with forest land, timberland or

Timberland Production areas nor does it result in the loss of forest land or conversion of forest land to non-forest use. For the same reasons set forth in the original MND, the operational modifications at the Capistrano Greenery will result in no impacts to agriculture and forestry resources.

Based on the above evidence, the proposed modifications at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Air Quality

The original MND for the Capistrano Greenery Composting Operation included an air quality and health risk impact analysis which concluded that construction and operation of the facility would result in less than significant impacts to air quality. The consultant-prepared air quality/health risk analysis concluded that the composting operation does not expose sensitive receptors to substantial pollutant concentrations or result in any human health risks. Nor does the composting operation have substantial pollutant concentrations associated with it. The original MND also included a quantitative odor study prepared by SCS Engineers Inc. (consultant under contract to OCWR) analyzing the composting operation at the PDL. The results of the study showed that the composting operation does not result in any significant odor impacts to the closest homes near the project site. The closest sensitive receptors are residential areas located approximately 1,180 feet west of the project site in San Juan Capistrano and approximately 2,200 feet south of the project site in Forster Ranch.

For the proposed project, an updated air quality/health risk assessment was prepared by LSA, under contract with OCWR, (included as Appendix A to this Addendum) to fully assess all project modifications, including construction and operation, new equipment, and changes to daily vehicle trips associated with the increase in daily tonnage and construction of the new solar field. The updated air quality study concluded that the construction of the project which would last approximately 8 months and begin in summer 2025 would not exceed any SCAQMD daily thresholds for VOCs, NOx, CO, sulfur oxides, PM2.5 or PM10 emissions. For the air quality modeling it was assumed that construction of the proposed project would require the use of one excavator, loader, dump truck, dozer and backhoe with concrete trucks delivering concrete and minor asphalt delivery.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. The results showed that the proposed project would also not exceed the significance criteria for VOCs, NOx, CO, SOx, PM10 or PM2.5 emissions during project operation; the proposed project would not result in a significant effect on regional air quality, nor result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State Ambient Air Quality Standard. The operation of the facility occurs at an existing, active landfill. Any operational increases in air emissions were found to be an insignificant increase when compared to the existing setting of the PDL operation. A Localized Significance Analysis was also completed by LSA for the proposed project which

determined that the proposed project would not result in a locally significant air quality impact. Various Project Design Features and Operational Control Measures (PDF & OCM) for the management of dust were incorporated into the original Capistrano Greenery project and will remain in effect with the proposed operational modifications. In addition, SCAQMD Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emissions source. SCAQMD Rule 403 also requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance offsite. Therefore, with implementation of SCAQMD Rule 403 measures, and continued implementation of the PDF & OCM as identified in the original MND, the proposed operational modifications would not result in new significant impacts to dust. The modifications to Capistrano Greenery Composting Operation will also not result in a change in terms of exposing sensitive receptors to substantial pollutant concentrations or result in any additional human health risks. The proposed modifications to the operation will not result in substantial pollutant concentrations at the closest residential community.

The operational modifications would require additional trucks to bring in the organic waste material as well as deliver the finished product to end users. Using 22-ton trucks, the proposed project would require up to 25 daily trucks for the 536 TPD intake (generating 50 daily trips) and up to 25 daily trucks for the 536 TPD compost delivery (generating 50 daily trips). This would equate to approximately 10 trips per hour. The Capistrano Greenery trip generation for 536 total TPD and the 50 total daily trucks (assuming a passenger car equivalent [PCE] factor of 2 for each truck) is:

- 200 daily trips
- 20 a.m. peak-hour trips (10 in and 10 out)
- 20 p.m. peak-hour trips (10 in and 10 out)

The remaining 160 PCE trips (80 inbound and 80 outbound) would occur outside the peak-hour periods. The updated air quality analysis concluded that these 50 vehicle trips per day would result in an insignificant increase in air emissions when compared to the existing environmental setting of the PDL operation that generated an average of 834 trucks per day crossing the scales in 2022.

The heavy equipment currently used at Capistrano Greenery include a windrow turner, two front loaders, a mobile screen, a water truck, and a dump truck. With the operational modifications, OCWR will also use a chipper/grinder, a conveyor, and 2 mechanical cover winders. The blowers for the CASP system will be operated from the proposed solar farms that will be constructed. The updated air quality analysis concluded that the additional equipment would result in an insignificant increase in air emissions when compared to the existing environmental setting of all of the heavy construction equipment (i.e., scrapers, compactor bulldozers, water trucks, etc.) and associated emissions associated with the active PDL that accepts approximately 4,000 TPD of solid waste.

The original MND completed an odor analysis for the Capistrano Greenery. An updated analysis for odor that accounts for the modified operations was completed by SCS Engineers in June 2023 (included as Appendix B of this Addendum) and concluded that the operational modifications to

Capistrano Greenery are expected to follow SCAQMD Rule 402 and will not cause significant off-site nuisance odor impacts based upon dispersion modeling analysis of representative odors. The minimum amount of an odorant perceived (smelled) is known as the detection threshold (D/T). This minimum amount represents the odor concentration. The worst-case residential odor impact modeled in the study (0.7 D/T) was well below the significant risk threshold of 4 D/T and not expected to be detectable at nearby residential and recreational areas. In addition, OCWR has implemented an Odor Impact Minimization Plan (OIMP) for the existing Capistrano Greenery Composting Operation, which will continue to be implemented with the proposed operational modifications and updated as needed and is also updated as needed with the RCSI. All Project Design Features and Operational Control Measures (PDF & OCM) incorporated into the existing operation will also continue to be implemented.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion and remains less than significant. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Biological Resources

The original MND for the Capistrano Greenery Composting Operation found that the operation had the potential to impact special status species, namely burrowing owls, which were observed in the vicinity of the proposed project location. Mitigation measures BIO-1 and BIO-2 were incorporated, resulting in a less than significant impact to biological resources with mitigation measures incorporated. It should be noted that continued surveys in the area confirmed that no nesting burrowing owls were present, and the species, including non-breeding individuals, has not been consistently observed in the area since that time. However, BIO-1 and BIO-2 will remain in effect and continue to be implemented for the proposed operational modifications.

The proposed modifications to the Capistrano Greenery Composting Operations would not result in any new impacts to biological resources. The Capistrano Greenery as well as the proposed trenching to connect the solar field to the facility is located entirely on the PDL in areas that are completely previously disturbed. Implementation of the proposed project will have no additional impacts to biological resources or any sensitive plant or animal species. The project will also not result in any impacts to riparian habitat or wetlands. The project will not interfere in any way with the movement of any migratory species or impede the use of native wildlife nursery sites. In addition, the proposed project will not result in the removal of any trees, so there will be no conflicts with the County's tree protection ordinance. While the project site located within the Orange County Southern Subregion Habitat Conservation Plan (HCP) area, the project is located on the PDL site, which is an existing permitted use in the NCCP/HCP. The project site is not located within a designated HCP reserve area or other sensitive conservation area identified by State, regional, or local plans. Thus, the project would not conflict with any applicable provisions of adopted plans related to the conservation of biological resources, and no mitigation is required. The project also will not result in the removal of any coastal sage scrub or any other native habitat. The project is consistent with NCCP/HCP policies and therefore no impacts will occur. The expanded facility boundary included in Phase 1B remains within areas of the landfill that are already completely disturbed and underlain by refuse. For those reasons, the modifications to

operations at the Capistrano Greenery will result in less than significant impacts to biological resources. The original mitigation measure BIO-1 continues to be in place and will continue to be implemented, ensuring that the impacts to biological resources remain less than significant.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Cultural Resources

The original MND for the Capistrano Greenery Composting Operation found that the project would result in no impacts to historical, archaeological, or paleontological resources since the project is located entirely on an existing landfill, in locations that are previously disturbed and where compacted soil is underlain by refuse. The proposed modifications to the operation will not disturb soils outside of the footprint of the existing PDL and will therefore not impact historical, archaeological, or paleontological resources. For the same reasons set forth in the original MND, the modifications to operations at the Capistrano Greenery will result in no impacts to cultural resources.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Energy

The original MND for the Capistrano Greenery Composting Operation found that the project would result in no impacts to energy resources. Based on operational modifications, an updated energy assessment was completed by LSA (included as Appendix A of this Addendum).

The Capistrano Greenery is located on the PDL which is an existing landfill operation. Green waste being composted has been brought to the landfill for disposal prior to the implementation of SB 1383, thereby resulting in a minimal increase in energy consumption. Based on anticipated fuel consumption, the proposed project would be a small fraction of fuel consumption in Orange County and therefore would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. In addition, because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact on regional energy supplies would be minor, in part because the operational modifications include the installation of solar panels to supply the CASP operation with power, the proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The updated energy study therefore concluded that there are no impacts to energy resources from the proposed modifications. For the same reasons identified in the original MND, the modifications to operations at the Capistrano Greenery will result in no impacts to energy.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Geology and Soils

The original MND for the Capistrano Greenery Composting Operation found that the project would result in less than significant impacts to geology and soils. The original MND also concluded that the project would have no impacts to wastewater disposal and paleontological resources.

As with the rest of Southern California, the project site is located within a seismically active area. However, there are no known active faults projecting toward, or extending across, the project site. The project site is not located within a currently designated State of California Earthquake Fault Zone. The nearest active fault is the Newport-Inglewood fault, located approximately two miles southwest of the project site. Landslides are prevalent throughout the PDL site, except in the northwest portion of the site. Elsewhere, landslides derived from the Capistrano and Monterey formations cover at least 50 percent of the site area. These landslides vary in size from small surficial slumps to large landslide masses up to 120 acres in size. However, the project is on compacted soil that overlies former landfill, and the project is an outdoor operation and will not result in the development of buildings or other permanent occupied structures. The project would not involve any other physical changes that would result in landslides or mudslides. The Capistrano Greenery Composting Operation, including modifications, will not result in the development or use of septic or wastewater treatment systems, and the project area is located entirely on a previously disturbed soil stockpile, and therefore no impacts to wastewater or paleontological resources will occur. For the same reasons found in the original MND, the modified project will result in less than significant impacts to geology and soils.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Greenhouse Gas Emissions

The original MND for the Capistrano Greenery Composting Operation found that the project would have less than significant impacts to Greenhouse Gas (GHG) emissions. The GHG emissions impact analysis prepared for the original MND for Capistrano Greenery concluded that the project would not generate GHG emissions either directly or indirectly that may have a significant impact on the environment, nor would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. The analysis also found that the truck trips and equipment associated with the composting operation would result in an insignificant increase when compared to the existing environmental setting of the active PDL. Pursuant to AB 32 and other laws and regulations mentioned in the GHG emissions impact analysis, composting is viewed as a positive step for reducing GHG emissions in California by

diverting some organic waste materials from landfills that would otherwise generate methane, which is a GHG.

An updated GHG assessment was prepared by LSA in March 2023 (included as Appendix A of this Addendum) to analyze the effect, if any, of the operational modifications to Capistrano Greenery. The study concluded that the operation would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, nor would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Pursuant to AB 32 and other laws and regulations mentioned in the GHG emissions impact analysis, composting is viewed as a very positive step for reducing GHG emissions in California by removing some of the organic waste materials from landfills that would otherwise be generating methane. The newly added daily truck trips associated with the increasing amount of tonnage accepted would result in an insignificant increase in GHG emissions when compared to the existing environmental setting of the PDL operation. The project would also be consistent with the 2022 AQMP and both the 2022 Scoping Plan and the Southern California Area Government (SCAG) Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS). For the same reasons described in the original MND, the operational modifications would also not conflict with any GHG reduction plans, and therefore result in less than significant GHG impacts.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Hazards & Hazardous Materials

The original MND for the Capistrano Greenery Composting Operation found that the project would have less than significant impacts to hazards and hazardous materials and no impacts in categories c) d) e) and f).

The Capistrano Greenery, including operational modifications, will not result in the use or transport of hazardous materials. The proposed project expands a green waste composting operation. The operation does and will continue to generate leachate from the composting process which is and will continue to be collected and reused in the composting operation. Equipment used in the composting operation is and will continue to be properly maintained so that there are no major spills or leaks of diesel fuel, oil or other fluids used in the standard operation of the heavy construction equipment that will be used at the composting operation. A spill response plan has been prepared and will continue to be implemented in compliance with NPDES requirements. The Capistrano Greenery is not located within one-quarter mile of an existing or proposed school, is not on a list of hazardous materials facilities compiled pursuant to Government Code Section 65962.5 and is not located within an airport land use plan area or within two miles of an airport. The original MND determined that the project does not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Per the updated 2023 Fire Hazard Severity Zones in the state, PDL is located on the southwestern edge of a high fire hazard zone. However, several factors significantly contribute to reducing the fire hazard at the proposed project site. The Capistrano Greenery Composting Operation is located on the active PDL that is completely disturbed; there is no native vegetation near the unloaded green waste, the windrows, curing piles or finished compost storage areas. The potential for the compost piles to generate fires are minimized by the implementation of proper compost operation practices such as maintaining the proper moisture content in the compost piles, turning the compost piles at the correct frequency, monitoring the temperature inside the compost piles, ensuring that the compost piles do not exceed the required height, width and length dimensions, maintaining proper spacing between the compost piles and ensuring proper access for firefighting equipment. If a compost pile does catch on fire, the fire will be immediately put out (i.e., smothered) by the loaders at the composting operation. The water truck can also be used if needed. The composting operation does not expose people or structures, either directly or indirectly, to a significant risk or loss, injury or death involving wildland fires.

OCWR and its consultants have worked closely with OCFA staff to ensure that the proposed Capistrano Greenery Composting Operation and modifications thereto will be designed to meet all OCFA requirements. Methane generated by the underlying landfill area does not result in surface fires at the composting area through the effective maintenance and monitoring of the landfill gas collection system. The composting area is also paved, which significantly minimizes any surface methane gas emissions. In addition, operation of the Capistrano Greenery included various Project Design Features and Operational Control Measures (PDF & OCM) to further reduce the project's impacts, which will continue to be implemented with the operational modifications.

In summary, due to the fire break provided by the graded landfill areas, the implementation of a Fire Prevention Plan, and strict compliance with OCFA requirements, impacts are considered to be less than significant. For the same reasons identified in the original MND, the modifications to operations at the Capistrano Greenery will result in less than significant impacts to hazards and hazardous materials.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Hydrology and Water Quality

The original MND for the Capistrano Greenery Composting Operation found that the project would result in less than significant impacts to hydrology and water quality as well as no impacts related to flood hazards or by obstructing implementation of a water quality control plan or sustainable groundwater management plan.

The Capistrano Greenery Composting Operation routinely generates leachate that must be captured. During storm events, surface water runoff and leachate is collected on-site in a lined pond and reused within the composting operation. Collected runoff and leachate is not discharged to the storm water drainage system at the landfill and will not degrade ground or surface water

quality. The project, including operational modifications entailing construction of a new solar field, will not result in a substantial increase in the rate or amount of surface water runoff nor result in substantial erosion or siltation on- or off-site, as runoff and leachate are collected on-site and reused on-site.

The project including operational modifications will not result in the violation of any water quality standards or waste discharge requirements. OCWR has applied for coverage under Order WQ 2015-0121-DWQ, General Waste Discharge Requirements for Composting Operations and coverage for Construction Activities and Industrial Activities under the National Pollutant Discharge Elimination Systems Permit (NPDES), issued by the California Regional Water Quality Control Board, San Diego Region (SDRWQCB). OCWR has also implemented a project specific Storm Water Pollution Prevention Plan (SWPPP) consisting of several Best Management Practices (BMPs) to control surface water runoff, erosion, and siltation at the project site during construction and operation which will be modified accordingly to account for operational modifications. OCWR will update site plans and technical reports as required in coordination with SDRWQCB.

The project, including operational modifications involves no drilling or deep grading and would not result in the depletion of groundwater supplies and would not interfere with groundwater recharge. The project will not result in the alteration of the course of a stream or river. The project site is not located within a 100- or 500-year flood zone (Zone X) as designated by the Federal Emergency Management Agency. The project will not expose people or structures to flooding risks. The project site is not located within a dam inundation area; although it is located approximately 3 miles from the Pacific Ocean, but not within any flood hazard, tsunami or seiche zone. The project, including modifications, will also not result in the obstruction of any water quality control plan or sustainable groundwater management plan.

To further reduce the project's less than significant impacts, OCWR included various Project Design Features and Operational Control Measures (PDF & OCM), which will continue to be implemented with the operational modifications in Phase 1B. For the same reasons found in the original MND, the modifications to operations at the Capistrano Greenery will not result in any significant impacts to hydrology and water quality.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

<u>Land Use & Planning</u>

The original MND for the Capistrano Greenery Composting Operation found that the project would result in no impacts to land use and planning. The project site, including all modifications is located on a combination of unincorporated County, Cities of San Clemente, and San Juan Capistrano area, located to the North of City of San Clemente and South of City of San Juan Capistrano (within the Cities' respective Spheres of Influence). The Orange County General Plan designation for the PDL site is 4LS (Public Facilities; Landfill Site). Because the property is owned by the County of Orange, the project is exempt from the provisions of the Orange County Zoning

Code. The proposed project will not physically divide an established community, nor will the proposed project conflict with any land use plans, policies or ordinances adopted for the purpose of avoiding or mitigating an environmental effect. No impacts will occur, as the operation of a composting operation (inclusive of the Phase 1B operational modifications) on the existing, active landfill site is consistent with the existing zoning and land use planning. For the same reasons set forth in the original MND, the modifications to operations at the Capistrano Greenery will not result in any significant impacts to land use and planning.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Mineral Resources

The original MND for the Capistrano Greenery Composting Operation found that the project would result in no impacts to mineral resources. The PDL site does not contain mineral resources that are either designated as important to the State of California or of local importance. In addition, the landfill site is not designated as a mineral resource recovery facility. For the same reasons set forth in the original MND, the modifications to operations at the Capistrano Greenery will not result in any significant impacts to mineral resources.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Noise

The original MND for the Capistrano Greenery Composting Operation found that the operation would result in less than significant impacts to noise. The MND noise analysis supported the finding that construction and operation of the composting operation would result in less than significant impacts to noise. Although the analysis concluded that no significant impacts would occur, OCWR added various Project Design Features and Operational Control Measures (PDF & OCM) to the project to further reduce the project's less than significant impacts, which will remain in effect with the operational modifications.

An updated noise assessment was prepared by LSA in August 2023 (included as Appendix C to this Addendum) to fully assess all proposed modifications, including construction and operation, new equipment, and changes to daily vehicle trips associated with the increase in daily tonnage. Project modifications include operation of the CASP system with blowers to aerate the piles and use of new equipment including a chipper/grinder, 2 conveyors, and a mechanical cover winder. Because the chipper/grinder will also be operating within a buffer zone in the larger footprint of the landfill, noise measurements were also evaluated from that perspective. The updated study concludes that short-term and long-term noise and vibration levels generated by the project would be less than significant. No mitigation measures are required. Limiting the construction hours

between 7:00 a.m. and 6:00 p.m. on weekdays and between the hours of 8:30 a.m. and 4:30 p.m. on Saturdays will further minimize the insignificant construction noise impacts.

As with the original project analyzed under the MND, the operational modifications do not result in a change to project operational hours, and all operations will take place during the daytime and will not exceed standards established by noise ordinances for the Cities of San Clemente and San Juan Capistrano or County of Orange. The operational modifications will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance and will not result in the generation of excessive ground borne vibration or ground borne noise levels. For the same reasons set forth in the original MND, and as demonstrated by the updated noise assessment, the modifications to operations at the Capistrano Greenery will not result in any significant noise impacts.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Population & Housing

The original MND for the Capistrano Greenery Composting Operation found that the project would result in no impacts to population and housing. The modifications to operations at the Capistrano Greenery will take place at an existing landfill site and will not result in the displacement of existing people, housing, or businesses as a result of the project. For the same reasons set forth in the original MND, the modifications to operations at the Capistrano Greenery will not result in any significant impacts to population and housing.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Public Services

The original MND for the Capistrano Greenery Composting Operation found that the project would result in no impacts to public services. The proposed modifications to operations at the Capistrano Greenery will not result in the increased need for public services such as police, fire, or emergency medical services, the building of new schools or parks or the need for either expanded or enhanced public facilities and services. For the same reasons set forth in the original MND, the modifications to operations at the Capistrano Greenery will result in no impacts to public services.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion.

The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Recreation

The original MND for the Capistrano Greenery Composting Operation found that the project would result in no impacts to recreation since the project would not result in the development of any new residential, commercial, or industrial developments that would increase the need for new recreational facilities or increase the use of existing recreational facilities. In addition, the proposed project would not directly or indirectly impact any existing recreational facilities. For the same reasons identified in the original MND, the modifications to operations at the Capistrano Greenery will result in no impacts to recreation.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Traffic

The original MND for the Capistrano Greenery Composting Operation concluded that the operation would result in less than significant impacts to transportation. The MND finding of less than significant impacts were based on a transportation analysis conducted by LSA to support those findings.

An updated transportation and traffic assessment was prepared by LSA in June 2023 (included as Appendix D to this Addendum) to fully assess all proposed modifications, including changes to daily vehicle trips associated with the increase in daily tonnage. The updated study concludes that the operational modifications would result in no associated significant increase or changes to transportation or traffic impacts.

The composting operation is located at an existing, active landfill. At the existing 204 TPD permitted capacity, using 22-ton per load end dump trucks, the landfill generates approximately 10 truck trips per day for the landfill (204/22 = 9.27) and another 10 truck trips per day for delivery of the finished compost for a total of 40 daily trips (2-way truck trips). At an increased maximum daily tonnage of 536 TPD and using 22-ton per load end dump trucks, the Capistrano Greenery will require up to 25 trucks (536/22 = 24.36), generating 50 daily trips. The 536 TPD of finished compost delivery would also require up to 25 trucks, generating 50 daily trips. The proposed project in total would therefore generate 50 daily trips at 536 TPD. This amounts to 200 average daily trips (ADT) assuming a passenger car equivalent (PCE) with conversion factor of 2 for each truck, including 20 trips in the a.m. peak hour (10 inbound and 10 outbound) and 20 trips in the p.m. peak hour (10 inbound and 10 outbound). The updated transportation and limited scope traffic analysis concluded that the Capistrano Greenery with operational modifications will not negatively affect the design or operation of the surrounding roadway system. Specifically, the evaluation of intersection Level of Service (LOS) shows that the addition of project traffic would not negatively affect the study area intersections and is not considered significant.

Regarding Vehicle Miles Travelled (VMT), according to the County of Orange's Final Draft Guidelines for Evaluating VMT under CEQA (LSA 2020), public services and facilities that support community health, safety, or welfare are screened from a VMT analysis. Such facilities include landfills. These facilities are already a part of the community, and as a public service, the VMT is accounted for in the existing regional average. Therefore, the proposed operational modifications to Capistrano Greenery also meets the County's screening criteria for VMT, meaning that the VMT impacts are less than significant.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Tribal Cultural Resources

The original MND for the Capistrano Greenery Composting Operation found that the project would result in no impacts to tribal cultural resources as the project area is located on a former refuse fill area of the PDL, completely underlain by refuse and entirely disturbed. Therefore, there is no possibility that tribal cultural resources will be present or will be disturbed during either the construction or operational phases of the project.

The modifications to the project operations will result in an expansion of the Capistrano Greenery boundary. However, the entirety of the project area is within landfill areas that are entirely disturbed. Therefore, there will continue to be no possibility of impacts to tribal cultural resources. For the same reasons set forth in the original MND, the modifications to operations at the Capistrano Greenery will not result in any significant impacts to tribal cultural resources.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Utilities and Service Systems

The original MND for the Capistrano Greenery Composting Operation found that the project would have a less than significant impact to water supply, and no impact to other utilities and service systems.

The original MND identified that a composting operation requires significant volumes of water to facilitate the composting process, to regulate temperatures, and to prevent fires, as well as for dust control. Usage for the PDL operation is approximately 133,000 gallons of potable water per day and 50,000 gallons of reclaimed water per day. At the Phase 1A 204 TPD composting operation, approximately 80,000 gallons of potable water are used each day for moistening the compost piles and for dust control. Altogether, the PDL operation and the Phase 1A Capistrano Greenery uses approximately 213,000 gallons of potable water per day.

Potable water will be utilized for the expanded composting operations and obtained from existing infrastructure at the facility. Excess water applied to new piles (leachate) will be collected via pipes, collecting in two (2) newly constructed on-site 7,500-gallon above ground tanks and reused on new piles as needed. It is anticipated that the CASP composting operations will require approximately 75,000 gallons of water per day for operation, resulting in an overall decrease in water usage as compared to the existing Phase 1A open windrow operation, which is estimated to use up to 255,000 gallons per day in combination with landfill operations. The Phase 1A and 1B operations are sequential, and estimated water use is not cumulative between phases. Thus, Phase 1B CASP composting will result in an overall reduction in the daily water usage at the facility as compared to the current Phase 1A composting operation. A reduction of up to 47,000 gallons per day by implementing CASP in Phase 1B is estimated. As such the existing infrastructure and supply remains sufficient to accommodate the project. In addition, OCWR may investigate the use of alternate water sources including reclaimed water and treated water from the PDL condensate treatment system for Capistrano Greenery to further reduce potable water use in the future, pending appropriate regulatory approvals. Therefore, the modification of operations at the Capistrano Greenery will not result in any significant impacts to utilities and service systems. In addition to requiring water, the blowers for the CASP system will require electrical power, which will be provided via the new solar system installed nearby; therefore, the blowers will be operated via the new solar system and will not result in the need for additional utility services. Therefore, the modification of operations at the Capistrano Greenery will not result in any significant impacts to utilities and service systems.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to the significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Wildfire

The original MND for the Capistrano Greenery Composting Operation found that the project would result in less than significant impacts to wildfire, with no impacts to an adopted emergency response plan or emergency evacuation plan, potential for exacerbation of wildfire risks, nor potential risks associated with post-fire instability or drainage changes. The project will not substantially impair an adopted emergency response plan or emergency evacuation plan. The project will be located at the PDL which is in a relatively remote location. Access to and from the PDL is via Ortega Highway and Avenida la Pata. During an emergency, such as a regional fire, vehicles exiting the landfill will not interfere or impede nearby resident vehicles that may be attempting to leave the area.

Per the updated 2023 Fire Hazard Severity Zones in the state, PDL is located on the southwestern edge of a high fire hazard zone. However, several factors significantly contribute to reducing the fire hazard at the proposed project site. The Capistrano Greenery Composting Operation is located on the active PDL that is completely disturbed. There is no native vegetation located near the unloaded green waste, the windrows, curing piles or finished compost storage areas. The potential for the compost piles to generate fires is minimized by the implementation of proper compost

operation practices such as maintaining the proper moisture content in the compost piles, turning the compost piles at the correct frequency, monitoring the temperature inside the compost piles, ensuring that the compost piles do not exceed the required height, width and length dimensions, maintaining proper spacing between the compost piles and ensuring proper access for firefighting equipment. If a compost pile does catch on fire, the fire will be immediately put out (i.e., smothered) by the loaders at the composting operation. The water truck can also be used if needed. The project will therefore not expose people or structures, either directly or indirectly, to a significant risk or loss, injury or death involving wildland fires.

OCWR and its consultants have worked closely with Orange County Fire Authority (OCFA) staff to ensure that the existing Capistrano Greenery Composting has been in strict compliance with all OCFA requirements, including a Fire Prevention Plan. With the operational modifications, the Fire Prevention Plan will be updated and reviewed by OCFA, and all required measures will continue to be implemented. There are also minimum requirements for flow are storage for fire permitting with OCFA that were met with the original design. In addition, the Greenery is paved with asphalt which minimizes the gas surface emissions.

Methane generated by the underlying landfill area will not result in surface fires at the composting area through the effective maintenance and monitoring of the landfill gas collection system.

As the operational phases for the Capistrano Greenery Composting Operation are sequential and the proposed CASP operation will reduce daily potable water consumption for by approximately 47,000-gallons per day, the existing infrastructure and supply remains sufficient to accommodate sufficient capacity for both daily operations and fire suppression. For the same reasons set forth in the original MND, the modifications to operations at the Capistrano Greenery will not result in any significant wildfire impacts.

Based on the above evidence, the modification of operations at the Capistrano Greenery Composting Operation at the PDL will not result in any changes to this significance conclusion. The modified project is therefore in compliance with CEQA Guidelines Section 15162 and 15164 and a subsequent EIR or ND is not required.

Basis for Addendum

The changes to the project will result in various modifications to operations at the existing Capistrano Greenery Composting Facility Operation at the Prima Deshecha Landfill. These modifications do not propose substantial changes to the project which would require major revisions to Mitigated Negative Declaration (SCH# 2020019030). The changes will not result in any new significant environmental impacts for the Capistrano Greenery Composting Facility Operation at the Prima Deshecha Landfill, or a substantial increase in the severity of any previously identified significant effects, as analyzed in the Mitigated Negative Declaration, and there is no new information of substantial importance to the project which was not or could not have been known when the Mitigated Negative Declaration was adopted. Therefore, as discussed in the environmental analysis included above, in accordance with Public Resources Code section 21166 and CEQA Guidelines sections 15162 and 15164, neither a subsequent EIR nor ND is required.