

**SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



ITEM: 12.1
(ID # 26208)

MEETING DATE:

FROM : DEPARTMENT OF WASTE RESOURCES

Tuesday, November 05, 2024

SUBJECT: DEPARTMENT OF WASTE RESOURCES: Approve the First Amendment to the First Amended and Restated Second El Sobrante Landfill Agreement and the Landfill Gas Revenue Sharing Agreement, between the County of Riverside and USA Waste of California, Inc. District 2. [\$0 - Department of Waste Resources Enterprise Fund] (CEQA- Consider the Addendum to the previously certified Environmental Impact Reports for the El Sobrante Landfill Expansion Project)

RECOMMENDED MOTION: That the Board of Supervisors:

1. Consider the Addendum to the previously certified Environmental Impact Reports (Expansion EIR-SCH#1990020076 & 2007081054) for the El Sobrante Landfill Expansion Project, based on the findings incorporated in the Addendum concluding that the proposed Renewable Natural Gas (RNG) Facility, as identified in the Joint Technical Document (JTD), does not cause new significant environmental impacts or increase the severity of previously identified impacts in the Expansion EIR;
2. Approve the First Amendment to the First Amended and Restated Second El Sobrante Landfill Agreement (Amendment No.1) between the County of Riverside (County) and USA Waste of California, Inc. (USA Waste);
3. Approve the Landfill Gas Revenue Sharing Agreement between the County and USA Waste;
4. Authorize the Chairman to execute Amendment No.1 and the Landfill Gas Revenue Sharing Agreement (Agreement) on behalf of the County;
5. Direct the Department of Waste Resources (RCDWR) to allocate the Annual Payment received under the Agreement as follows: 90% to TLMA -Transportation for road and bridge maintenance and improvements, and 10% to Second District for community benefits; and
6. Direct the RCDWR to file the Notice of Determination with the County Clerk and the State Clearinghouse within five working days of approval by this Board.

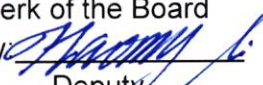
ACTION:Policy


Andrew Cortez 10/23/2024

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Jeffries, seconded by Supervisor Gutierrez and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes: Jeffries, Spiegel, Washington, Perez and Gutierrez
Nays: None
Absent: None
Date: November 5, 2024
xc: Waste

Kimberly A. Rector
Clerk of the Board
By: 
Deputy

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FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	\$0	\$0	\$0	\$0
NET COUNTY COST	\$0	\$0	\$0	\$0
SOURCE OF FUNDS: Waste Resources Enterprise Funds			Budget Adjustment:	No
			For Fiscal Year:	24/25

C.E.O. RECOMMENDATION: Approve

BACKGROUND:

Summary

USA Waste, a subsidiary of Waste Management (WM) owns and operates the El Sobrante Landfill, an existing non-hazardous municipal solid waste (MSW) landfill located at 10910 Dawson Canyon Road, easterly of Interstate 15 and Temescal Canyon Road, in the Temescal Valley community of unincorporated Riverside County. The landfill operates under a public-private partnership with the County via a landfill agreement, approved by the Board of Supervisors (Board) in September 1998. The landfill agreement has been amended five (5) times to address various operational and administrative changes at the landfill, with the last amendment approved on July 17, 2018 (First Amended and Restated Second El Sobrante Landfill Agreement).

In 2016, WM decommissioned their landfill gas (LFG)-to-energy cogeneration plant at the landfill due to fiscal and regulatory constraints. Currently LFG is collected from the landfill and sent to the onsite flare station for destruction. In 2021, WM and Toro Energy, LLC. (Toro) executed an agreement for Toro to install and operate a RNG Facility at the landfill.

Summary of the RNG Facility:

- The RNG facility will be located within three previously disturbed areas within WM owned landfill property.
- LFG is intercepted prior to combustion at the existing flares and is refined/processed.
- Once the gas meets SoCal Gas specifications, it is diverted to Point of Receipt site, and transferred to the SoCal Gas pipeline.

The RNG project was presented to the El Sobrante Landfill Administrative Review Committee (ARC) in July 2023, and several times to the Citizen Oversight Committee (COC) from 2023-2024. During the initial discussion with the COC in August 2023, they requested additional environmental review and evaluation of potential revenue sharing. In response, County Staff (Waste Resources, County Counsel, and Second District) engaged in detailed analysis and negotiations with WM and Toro, which resulted in the preparation of the following documents:

- 1) Amendment to Landfill Agreement
 - Minor administrative updates to the Landfill Agreement.

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2) Revenue Sharing Agreement

- Provides \$250k annually to the County, with 2% growth per year, or potentially more if the indices (listed in the Agreement) have a greater annual rate.
- Allocation Formula: 90% to TLMA -Transportation for road and bridge maintenance and improvements (w/in boundaries of the Temescal Valley Municipal Advisory Committee), and 10% to Second District for community benefits (10% of this to COC).

3) Addendum to the Landfill EIR

- See CEQA Findings Section below.

These documents were discussed with the COC during the October 9, 2024, COC meeting. COC members were supportive of the Project and appreciative of the additional environmental review and revenue sharing opportunities. Staff recommends approval of the RNG Project, as detailed in the recommended motions.

Prev. Agn. Ref.: M.O. 10.3 of 09/01/98
M.O. 12.2 of 07/01/03
M.O. 12.1 of 03/13/07
M.O. 12.3 of 03/31/09
M.O. 12.2 of 12/18/12
M.O. 12.2 of 04/07/15
M.O. 12.1 of 07/17/18

CEQA Findings

Prior to approval of the Agreements (Project), compliance with CEQA is required. RCDWR and County Counsel have determined that an Addendum to the El Sobrante Landfill Expansion Environmental Impact Report (AEIR) is the appropriate mechanism under CEQA. The AEIR was prepared by AECOM, an environmental consulting firm.

The AEIR evaluated the proposed RNG Facility. As part of the AEIR, updated technical reports were prepared, including but not limited to biological reports, air quality/greenhouse gas analysis, visual simulations for aesthetics, cultural and paleontological resources reports, flood risk, geotechnical reports, and noise & vibration analysis. The AEIR found that the Project would not result in new significant impacts or substantially more severe impacts than previously evaluated in the Expansion EIR's.

A Notice of Determination will be filed with the County Clerk and the State Clearinghouse upon Project approval.

Impact on Residents and Businesses

As demonstrated in the AEIR, the Project will not generate new significant impacts or substantially increase impacts, to residents and businesses. The RNG facility will create a new

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source of clean green energy and reduce emissions from burning landfill gas. Additionally, the Project will provide ongoing funding for maintenance and improvements of transportation facilities (roads/bridges) in the Temescal Valley, as well as fund other community benefits.

ATTACHMENTS

- ATTACHMENT A.** First Amendment to the First Amended and Restated Second El Sobrante Landfill Agreement
- ATTACHMENT B.** Landfill Gas Revenue Sharing Agreement
- ATTACHMENT C.** Addendum to the EIR
- ATTACHMENT D.** CEQA Notice of Determination


Jason Farin, Principal Management Analyst 10/30/2024


Aaron Gettis, Chief of Deputy County Counsel 10/29/2024

**FIRST AMENDMENT TO THE FIRST AMENDED AND RESTATED
SECOND EL SOBRANTE LANDFILL AGREEMENT**

This First Amendment to the First Amended and Restated Second El Sobrante Landfill Agreement (hereinafter called "AMENDMENT") is entered into November 5, 2024, by and between the COUNTY OF RIVERSIDE, a political subdivision of the State of California (hereinafter called "COUNTY") and USA WASTE OF CALIFORNIA, INC., a Delaware corporation (hereinafter called "USA WASTE").

RECITALS

WHEREAS, USA WASTE owns and operates the El Sobrante Landfill located at 10910 Dawson Canyon Road, Corona, County of Riverside, California 92883 ("LANDFILL" or "ESL"); and

WHEREAS, COUNTY is a party to that certain El Sobrante Landfill Agreement dated September 3, 1985, and six (6) amendments to said Agreement (collectively, the "FIRST AGREEMENT") under the terms and conditions of which WESTERN WASTE INDUSTRIES, an affiliate of USA WASTE, owned and operated the El Sobrante Landfill in the County of Riverside as a public-private partnership; and

WHEREAS, the Second El Sobrante Landfill Agreement was adopted by the parties on September 1, 1998 and amended in accordance with the First Amendment to the Second El Sobrante Landfill Agreement dated June 20, 2003, the Second Amendment to the Second El Sobrante Landfill Agreement dated March 13, 2007, the Third Amendment to the Second El Sobrante Landfill Agreement dated December 18, 2012, and the Fourth Amendment to the Second El Sobrante Landfill Agreement dated April 7, 2015 (collectively, the "EXISTING SECOND AGREEMENT"); and

WHEREAS, the COUNTY and USA WASTE entered into that certain FIRST AMENDED AND RESTATED SECOND EL SOBRANTE LANDFILL AGREEMENT dated August 6, 2018 ("ESL AGREEMENT"), which details the responsibilities and obligations of the COUNTY and USA WASTE with respect to the ownership, operation, maintenance, and long-term closure of ESL as more fully described in the ESL AGREEMENT; and

WHEREAS, title to Landfill Gas ("LFG") which is produced within the LANDFILL as a by-product of the decomposition of waste is held by USA WASTE; and

WHEREAS, USA WASTE has entered into a Landfill Gas Purchase and Sale Agreement with Toro Energy of California ES, LLC, ("TORO") dated October 14, 2021, as amended by the First Amendment to Landfill Gas Purchase and Sale Agreement dated April 18, 2023 (collectively, the "LFG SALE AGREEMENT") pursuant to which, among other things, USA WASTE has agreed to sell LFG to TORO for processing in TORO's facilities located on a portion of the LANDFILL; and

WHEREAS, pursuant to Section 8.5.3 of the ESL AGREEMENT, USA WASTE agreed to enter into a revenue sharing arrangement with the COUNTY from the retail sales of products

with marketable value produced from landfill gas, and USA WASTE and COUNTY now desire to enter into such an amendment to the ESL AGREEMENT in connection with the retail sale of processed LFG and/or RNG by TORO.

NOW, THEREFORE, in consideration of the promises above stated and the terms, conditions, covenants, and agreements contained herein, COUNTY and USA WASTE do hereby agree as follows:

1. REVISION TO SECTION 1.1.19(e)

Section 1.1.19(e) of the AGREEMENT is revised by replacing the existing Subsection (e) with the following: "A facility for the generation of power (electricity, renewable natural gas, etc.) using landfill gas; and".

2. INCORPORATION OF THE LANDFILL GAS REVENUE SHARING AGREEMENT INTO THE ESL AGREEMENT

The Landfill Gas Revenue Sharing Agreement between the COUNTY and USA WASTE dated November 5, 2024, attached to this AMENDMENT as Exhibit A, is incorporated herein, and thereby into the ESL Agreement, by reference in its entirety.

3. OTHER TERMS AND CONDITIONS UNCHANGED.

Unless defined herein or the context requires otherwise, all capitalized terms herein shall have the meaning defined in the ESL AGREEMENT. This AMENDMENT sets forth and contains the entire understanding and agreement of the parties, and there are no oral or written representations, understandings or ancillary covenants, undertakings or agreements which are not contained or expressly referred to herein. Except as expressly amended by this AMENDMENT, all other terms and conditions of the ESL AGREEMENT shall remain unchanged and remain in full force and effect. In the event of any conflict between the terms and conditions of this AMENDMENT and the terms and conditions of the ESL AGREEMENT, the terms and conditions of this AMENDMENT shall prevail and control. Subject to the provisions of the ESL AGREEMENT as to assignment, the agreements, conditions and provisions herein contained shall apply to and bind the heirs, executors, administrators, successors and assigns of the parties hereto. If any provisions of this AMENDMENT shall be determined to be illegal or unenforceable, such determination shall not affect any other provision of the ESL AGREEMENT and all such other provisions shall remain in full force and effect. The language in all parts of the AMENDMENT shall be construed according to its normal and usual meaning and not strictly for or against either COUNTY or USA WASTE.

4. CONFIDENTIALITY.

Any document or information submitted or provided to COUNTY hereunder by USA WASTE which is claimed by USA WASTE not to be subject to disclosure under the California Public Records Act (Government Code Sections 6250 et. seq.) shall be so designated in writing by USA WASTE at the time of its submission, together with the reasons for its exemption, and thereafter if any person requests or demands the disclosure of any such document or information, COUNTY shall immediately notify USA WASTE thereof and USA WASTE shall, within five (5)

business days of receipt of such notice, inform COUNTY whether USA WASTE desires to maintain the exempt nature of the document or information, and if it does so, of its agreement to defend and indemnify the COUNTY in any litigation over the disclosure of such documents, and in the event USA WASTE shall fail to so notify COUNTY, COUNTY may disclose such document to the requesting party without any liability whatsoever to USA WASTE for such disclosure.

5. GOVERNING LAW.

This Agreement shall be governed by, and construed and enforced in accordance with, the laws of the State of California without reference to its conflicts of laws principles.

6. AUTHORIZATION.

Each party to this AMENDMENT hereby represents and warrants to the other party that: (a) it has the full right, power, and authority to enter into this AMENDMENT and to perform its obligations hereunder; and (b) the execution of this AMENDMENT by the individual whose signature is set forth at the end of this AMENDMENT on behalf of such party, and the delivery of this AMENDMENT by such party, have been duly authorized by all necessary action on the part of such party.

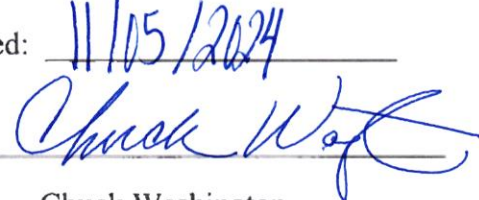
7. COUNTERPARTS.

This AMENDMENT may be executed in one or more counterparts, each of which shall be deemed an original. All counterparts shall be construed together and shall constitute one agreement.

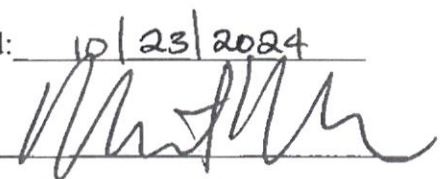
[Signature page follows]

IN WITNESS WHEREOF, this AMENDMENT has been executed and is effective on the date the Board of Supervisors takes action on it.

COUNTY OF RIVERSIDE, ON BEHALF OF DEPARTMENT OF WASTE RESOURCES, a political subdivision of the State of California

Dated: 11/05/2024
By: 
Chuck Washington
Chairman, Board of Supervisors

USA WASTE OF CALIFORNIA, INC, a Delaware corporation

Dated: 10/23/2024
By: 
Name: Michael Hammer
Its: President - Southern California Area

RECOMMENDED FOR APPROVAL:

By: Andy Cortez
Digitally signed by Andy Cortez
Date: 2024.10.29 11:12:17 -07'00'

Andy Cortez
General Manager-Chief Engineer

ATTEST:
Kimberly Rector
Clerk of the Board

By: 
Deputy

(Seal)

APPROVED AS TO FORM:
Minh C. Tran
County Counsel

By: 
Braden Holly
Deputy County Counsel

EXHIBIT A
LANDFILL GAS REVENUE SHARING AGREEMENT

LANDFILL GAS REVENUE SHARING AGREEMENT

Between

County of Riverside

And

USA Waste of California, Inc., dba El Sobrante Landfill

Dated as of November 5, 2024

LANDFILL GAS REVENUE SHARING AGREEMENT

This LANDFILL GAS REVENUE SHARING AGREEMENT is made and dated as of November 5, 2024 ("Effective Date"), between County of Riverside, a political subdivision of the state of California ("County"), and USA Waste of California, Inc., dba El Sobrante Landfill, a Delaware corporation ("USA Waste").

RECITALS

WHEREAS, USA Waste owns and operates the El Sobrante Landfill located at 10910 Dawson Canyon Road, Corona, County of Riverside, California 92883 ("Landfill" or "ESL");

WHEREAS, County and USA Waste have entered a public-private partnership in the operation of ESL and are parties to that certain First Amended and Restated Second El Sobrante Landfill Agreement dated August 6, 2018, ("ESL Agreement"), which details the responsibilities and obligations of the parties with respect to the ownership, operation, maintenance and long-term closure of ESL as more fully described in the ESL Agreement;

WHEREAS, title to Landfill Gas ("LFG," as defined below) which is produced within the Landfill as a by-product of the decomposition of waste is held by USA Waste;

WHEREAS, USA Waste has entered into a Landfill Gas Purchase and Sale Agreement with Toro Energy of California ES, LLC, ("Toro") dated October 14, 2021, as amended by the First Amendment to Landfill Gas Purchase and Sale Agreement dated April 18, 2023 (collectively, the "LFG Sale Agreement") pursuant to which, among other things, USA Waste has agreed to sell LFG to Toro for processing in Toro's facilities and Toro has agreed to construct and operate LFG processing facilities on a portion of the real property where the Landfill is located and which is leased by Toro (the "Toro Project, as defined below"); and

WHEREAS, pursuant to Section 8.5.3 of the ESL Agreement, USA Waste agreed to enter into a revenue sharing arrangement with the County from the retail sales of products with marketable value produced from landfill gas, and USA Waste and County now desire to enter into such an agreement in connection with the retail sale of processed LFG and/or RNG by Toro, and the construction, development and operation of the Toro Project, on the terms and conditions set forth below.

NOW, THEREFORE, in consideration of the mutual agreements contained herein and other good and valuable consideration, receipt of which is hereby acknowledged, County and USA Waste agree as follows:

ARTICLE I DEFINITIONS

Section 1.1 Definitions. When used in this Agreement, the following terms shall have the meanings specified below:

"AAA" means the American Arbitration Association.

“Affiliate” means a Person that directly or indirectly, through one or more intermediaries, controls, is controlled by, or is under common control with, the Person specified, provided that notwithstanding anything in this Agreement to the contrary, County is not an Affiliate of USA Waste, and vice versa. For purposes of this Agreement, the direct or indirect ownership of over fifty percent (50%) of the outstanding voting securities of an entity, or the right to receive over fifty percent (50%) of the profits or earnings of an entity, shall be deemed to constitute control. Such other relationships as in fact results in actual control over the management, business, and affairs of an entity, shall also be deemed to constitute control.

“Agreement” means this Landfill Gas Revenue Sharing Agreement, including all exhibits attached hereto.

“Applicable Law” means any law (including common law), statute, act, decree, ordinance, rule, directive (to the extent having the force of law), tariff, order, treaty, permit (including but not limited to Permits), code or regulation, or any binding interpretation of any of the foregoing, as enacted, issued, or promulgated by any Governmental Authority, including all amendments, modifications, extensions, replacements or re-enactments thereof, in each case applicable to and binding upon such Person or any of its properties, or to which such Person or any of its property is subject.

“Billing Year” means each calendar year during the Term of this Agreement, except that (a) the first Billing Year shall commence on the Delivery and Purchase Commencement Date and end on the first December 31st following such date, or if applicable, upon the earlier termination of this Agreement; and (b) the last Billing Year shall end at the end of the Term, or if applicable, upon the earlier termination of this Agreement.

“Board” means the Board of Supervisors of the County of Riverside.

“Business Day” means a Day other than a Saturday, Sunday, or federal holiday recognized as such by the U.S. Office of Personnel Management.

“County” means the County of Riverside, a political subdivision of the State of California.

“Day” means each twenty-four-hour period beginning at 12:01 am Central Standard Time.

“Delivery and Purchase Commencement Date” means the period of time commencing when the utility pipeline valve is open and LFG is first delivered to Toro's Facilities pursuant to the LFG Sale Agreement, as memorialized in a writing executed by USA Waste and Toro.

“Delivery Point” means the point of interconnection between the Landfill and the Toro Facilities downstream of USA Waste's blower and upstream of USA Waste's flare.

“Effective Date” has the meaning set forth in the preamble of this Agreement.

“Environmental Benefits” means any benefit or incentive, tangible or intangible, including but not limited to DSIRE incentives, tax credits, REN, PTC, ITC, REC, MACRS, RIN, feed-in tariffs, carbon credits, ERC credits, environmental attributes, air quality, fuel diversity, renewable energy certificates, and/or GHG credits, that is or becomes available to Toro as a result of the

purchase, including but not limited to as a result of processing or utilization of LFG and/or as a result of the generation, consumption or sale of electricity generated using LFG. For purposes of clarity, Environmental Benefits excludes any capital avoidance monetary incentive grant to Toro for construction and interconnection of Toro's Facilities to the SoCalGas pipeline system pursuant to the California Public Utilities Commission (CPUC) Decision 15-06-029, the biomethane interconnector monetary incentive program, Rule 39.

"Environmental Law" means any Applicable Law which pertains to human health and safety (to the extent related to the handling of, or exposure to, any Hazardous Substance), pollution or protection of the environment or natural resources (including but not limited to soil, land surface or subsurface strata, ambient air, surface water or groundwater), or the use, production, generation, handling, transportation, treatment, testing, recycling, storage, disposal, discharge, release, or cleanup of Hazardous Substances, industrial waste, or municipal solid waste.

"Force Majeure Event" has the meaning set forth in **Error! Reference source not found.**

"GAAP" means United States generally accepted accounting principles, as consistently applied by USA Waste.

"Governmental Authority" means any court or tribunal in any applicable jurisdiction or any applicable federal, state, or local government, any applicable political subdivision thereof, or any other applicable governmental, judicial, or statutory instrumentality, authority, body, agency, commission, administration, or bureau.

"Hazardous Substance" means any material, substance or waste that is subject to regulation, investigation, control, or remediation under any Environmental Law, including any material, substance or waste that is defined as a "hazardous material," "hazardous substance," "hazardous waste," "toxic waste" or "toxic substance."

"Lease Agreement" means that certain Lease Agreement between USA Waste and Toro dated January 13, 2022, and all subsequent amendments thereto.

"LFG" means the gases and their constituents, including methane, carbon dioxide, and other gases produced by the decomposition of matter within the Landfill, above the liner on top of which the solid waste is deposited and below the cap covering the solid waste deposited at the Landfill, as such landfill gas may exist from time to time.

"LFG Collection System" means the system of wells, pipes, and ancillary equipment (including the blower and flare) that exists upstream of the Delivery Point and is used to collect and extract LFG from the Landfill pursuant to the Landfill Permit. For the avoidance of doubt, the LFG Collection System shall include the blower and flare, even if the blower and flare are downstream of the Delivery Point.

"Losses" means any and all costs, liabilities, penalties, fines, damages, and expenses, including reasonable attorneys' fees and all court costs and experts' fees.

"Notice" Any notices, reports, certifications, or other documentation, and other communications made or required pursuant to this Agreement.

“Party” shall mean County or USA Waste, as applicable, and “Parties” shall mean both County and USA Waste.

“Party Representative Negotiations” has the meaning set forth in Section 13.3(a).

“Permit” means all actions, reviews, approvals, consents, waivers, exemptions, variances, franchises, orders, permits, operating or other plans, reports, licenses, financial assurance, authorizations, rights, licenses, filings, zoning, title, and entitlements of whatever kind and however described which are required under Applicable Law to be obtained or maintained by either Party in connection with the performance of its obligations pursuant to this Agreement.

“Person” means any individual or legal entity, including a partnership, limited liability company, joint venture, corporation, trust, unincorporated organization, or governmental entity, or any department or agency thereof.

“Personnel” means, with respect to a Person, the employees, officers, directors, agents, representatives, partners, consultants, engineers, invitees, subcontractors, and vendors of (a) such Person, (b) any of its Affiliates, or (c) any of its subcontractors or vendors of any tier.

“RNG” means pipeline quality (commonly greater than 90% CH₄ content) renewable natural gas that is produced when LFG is processed, cleaned, and conditioned in Toro's Facilities to RNG, which can be interchangeable with traditional pipeline quality natural gas, and includes for purposes of this Agreement all the Environmental Benefits associated with RNG and such use of LFG for RNG.

“SoCalGas” means Southern California Gas Company.

“Taxes” means:

(a) any taxes, customs, duties, charges, fees, levies, penalties or other assessments imposed by any federal, state, local or foreign taxing authority, including, but not limited to, income, gross receipts, windfall profit, severance, real and personal property, production, sales, use, license, excise, franchise, net worth, employment, occupation, payroll, withholding, social security, alternative or add-on minimum, ad valorem, transfer, stamp, or environmental tax, or any other tax, custom, duty, fee (including any franchise fee or similar fee), levy or other like assessment or charge of any kind whatsoever, together with any interest, penalty, addition to tax, or additional amount attributable thereto; and

(b) any liability for the payment of amounts with respect to payment of a type described in clause (a), including as a result of being a member of an affiliated, consolidated, combined or unitary group, as a result of succeeding to such liability as a result of merger, conversion, or asset transfer or as a result of any obligation under any tax sharing arrangement or tax indemnity agreement.

“Term” means that period of time described in Section 2.1.

“Toro Facilities” means all facilities that are engineered, designed, and constructed by Toro or on behalf of Toro and (a) installed at, and downstream of, the Delivery Point, including the

associated metering equipment and Toro's pipeline on USA Waste's property used to deliver RNG to SoCalGas and (b) are not required for the operation of the LFG Collection System.

“USA Waste Facilities” means the LFG Collection System, and other equipment owned by USA Waste, as modified from time to time, including but not limited to USA Waste's equipment that is: (a) used or that can be used to produce and collect LFG and deliver such LFG to the LFG Delivery Point; and (b) necessary to combust any LFG which is not used by Toro's Facilities, including but not limited to the blower and flare, LFG wells, headers, laterals, leachate and condensate piping, sumps, pumps, and other components of the Collection System prior to Delivery Point.

Section 1.2 Construction of Certain Terms and Phrases.

(a) All exhibits, annexes, and schedules attached to this Agreement are incorporated herein by this reference and made a part hereof for all purposes. References to sections, exhibits, annexes, and schedules are, unless otherwise indicated, references to sections, exhibits, annexes, and schedules to this Agreement. References to a section shall mean the referenced section and all sub-sections thereof;

(b) As used in this Agreement and in any certificate or other documents made or delivered pursuant hereto or thereto, financial and accounting terms not defined in this Agreement or in any such certificate or other document, and financial and accounting terms partly defined in this Agreement or in any such certificate or other document to the extent not defined, will have the respective meanings given to them under GAAP. To the extent that the definitions of financial and accounting terms in this Agreement or in any such certificate or other document are inconsistent with the meanings of such terms under GAAP, the definitions contained in this Agreement or in any such certificate or other document will control;

(c) The words “hereof”, “herein”, “hereunder”, and words of similar import when used in this Agreement will refer to this Agreement as a whole and not to any particular provision of this Agreement. Section references contained in this Agreement are references to Sections in this Agreement unless otherwise specified. The terms “includes” or “including” will mean “including without limitation;”

(d) The definitions contained in this Agreement are applicable to the singular, as well as the plural forms of such terms and to the masculine, as well as to the feminine and neuter genders of such terms;

(e) Any term not defined in this Article I or elsewhere in this Agreement (including an amendment or exhibit) that is used in this Agreement, shall have its plain meaning in common English usage, provided that words and abbreviations having well-known meanings in the United States LFG production industry shall have those meanings;

(f) References to any statute, code, or statutory provision are to be construed as a reference to the same as it exists as of the Effective Date, and includes references to all bylaws, instruments, orders and regulations for the time being made thereunder or deriving validity therefrom unless the context requires otherwise.

ARTICLE II TERM AND TERMINATION

Section 2.1 Term and Termination. The term of this Agreement shall commence on the Effective Date and shall terminate contemporaneously with termination of the LFG Sale Agreement, unless terminated earlier pursuant to Section 9.2 of this Agreement (the “Term”).

ARTICLE III DEVELOPMENT AND CONSTRUCTION OF THE TORO FACILITIES

Section 3.1 Cooperation Regarding Construction, Testing, and Start-Up Obligations. The Parties shall cooperate in good faith with each other in connection with the construction, testing, and startup tasks required to perform the Parties’ obligations hereunder and under the LFG Sale Agreement.

Section 3.2 Timeline for Construction. A proposed timeline for the completion of the construction of the Toro Facilities is set forth in Exhibit A.

Section 3.3 Cooperation Regarding Permits. Upon request, County shall reasonably assist USA Waste and Toro in connection with obtaining any Permits.

Section 3.4 Toro Real Property Rights. The Parties acknowledge that USA Waste has (i) leased portions of the Landfill, as set forth in the Lease Agreement, to Toro for the purposes of Toro’s developing, constructing, owning, and operating the Toro Facilities, as well as performing all activities incidental thereto and (ii) entered into the LFG Sale Agreement.

ARTICLE IV LFG DELIVERY OBLIGATIONS

Section 4.1 Delivery and Purchase Commencement Date Notice. USA Waste shall notify the County in writing within thirty (30) Days following the Delivery and Purchase Commencement Date.

ARTICLE V ROYALTY PAYMENT

Section 5.1 Royalty Payment. During the Term and after the Delivery and Purchase Commencement Date, USA Waste shall pay to the County an Annual Fee for any Billing Year that equals the greater of the following: (a) Two Hundred Fifty Thousand Dollars (\$250,000.00), which shall increase by two percent (2%) every Billing Year commencing in 2026; or (b) the amount calculated as follows: multiply 2% of the MMBtu of RNG delivered by Toro to SoCalGas as measured at the SoCal Gas Meter by the greater of the average annual price set forth in the following indices: the U.S. Energy Information Administration Natural Gas Citygate Price Index in California at <https://www.eia.gov/dnav/ng/hist/n3050ca3m.htm> (“EIA Price”) or the NGI Natural Gas Intelligence SoCal Citygate Price at <https://www.naturalgasintel.com/data-snapshot/daily-gpi/CALSCG/> (“NGI Price”). If the EIA Price or the NGI Price are not published for any given month, the applicable price shall be the price published for the prior month, and provided further if either indexes is no longer published or if such publication ceases to be

published, then the price shall be based on a similar national publication as agreed upon between the Parties and approved by Toro, which approval shall not be unreasonably withheld. USA Waste shall be responsible for funding any required subscription or access to any indices utilized in annual fee calculations per Section 5.1. The Annual Fee shall be paid for every Billing Year; provided, however, that the Annual Fee shall be pro-rated for any Billing Year where (a) scheduled or unscheduled repairs requiring a shutdown of the LFG Processing Facility that exceeds twenty-one (21) consecutive days for reasons beyond the reasonable control of USA Waste and/or Toro; (b) Force Majeure Events result in an inability to produce RNG for more than thirty (30) days during the Billing Year, despite USA Waste's and Toro's due diligence (as defined in Section 11.1); (c) shut-downs of the Toro Facilities or USA Waste Facilities are required by County, other Governmental Authorities, or by USA Waste and approved by County; or (d) the number of actual days in such Billing Year is less than 365 (to be prorated based on such number of days divided by 365). Nothing in this Agreement should be deemed or interpreted as giving County any rights whatsoever in the Environmental Benefits, the LFG or RNG, the Landfill, USA Waste Facilities, or Toro Facilities.

Section 5.2 Payment.

(a) Payment. USA Waste shall pay County the Annual Fee no later than January 31 following the completion of the related Billing Year. If such due date is not a Business Day, then the due date shall be the next Business Day.

(b) Late Payment. Any payment not timely made by USA Waste under this Agreement shall accrue late interest at the lesser of (i) one and one-half percent (1.5%) per month, or (ii) the highest rate permitted by law from the date due until such amounts are paid.

Section 5.3 Records. USA Waste shall keep full, true, and complete records of the documents supporting the calculation of the Annual Fee and Payments made by USA Waste to the County pursuant to this Agreement and shall make such records available to County upon County's reasonable request.

ARTICLE VI CONFIDENTIALITY

Section 6.1 Confidential Information. Subject to Section 13.14, the Parties shall treat as strictly confidential all information they obtain in connection with this Agreement which (i) is confidential or proprietary to either Party; (ii) relates to the operations, policies, procedures, techniques, accounts and personnel of either Party; or (iii) is confidential or proprietary to a third party and is in the possession, custody or control of either Party; provided that the following information shall not be deemed to be subject to this obligation to maintain confidentiality, (A) information which was lawfully in the receiving Party's possession or was known to it prior to its disclosure from the disclosing Party as evidenced by written records; (B) information is, at the time of disclosure, or thereafter becomes public knowledge without the fault of the receiving Party; (C) information that is or becomes rightfully available on an unrestricted basis to the receiving Party from a source other than, directly or indirectly, the disclosing Party which did not, to the

receiving Party's reasonable belief, acquire the same under an obligation of confidentiality to the disclosing Party; or (D) information is disclosed by the receiving Party with the prior written consent of the disclosing Party. Without the other Party's written permission, neither Party shall disclose information pertaining to this Agreement or any information obtained through the performance of this Agreement unless required to be disclosed pursuant to Applicable Law or legal process in which case the Party required to disclose such information shall give the other Party, at its own expense, a reasonable opportunity to object or otherwise take action to protect its rights and interest in such information. Notwithstanding the foregoing, USA Waste may share the commercial information contained in this Agreement with Toro, provided USA Waste ensures Toro is bound by similar confidentiality provisions as provided in this Section 6.1. This provision shall survive the termination or expiration of this Agreement until the fifth anniversary of such expiration or termination.

ARTICLE VII TAXES

County shall pay or cause to be paid all Taxes and assessments imposed on County, if any, with respect to the amounts paid by USA Waste to County hereunder. USA Waste shall pay or cause to be paid all other Taxes and assessments, if any, imposed upon USA Waste with respect to this Agreement.

ARTICLE VIII REPRESENTATIONS AND WARRANTIES

Section 8.1 Representations and Warranties of Both Parties. Each Party represents and warrants to the other Party that the following statements are true and correct as of the Effective Date:

(a) there are no pending or, to such Party's knowledge, threatened claims, disputes, governmental investigations, suits, actions (including non-judicial real or personal property foreclosure actions), arbitrations, legal, administrative or other proceedings of any nature, domestic or foreign, criminal or civil, at law or in equity, by or against such Party that challenge the enforceability of this Agreement or the ability of such Party to consummate the transactions contemplated herein;

(b) it has full power and authority to execute and deliver this Agreement and to consummate the transactions contemplated hereby, and this Agreement constitutes the legal, valid and binding agreement of such Party, enforceable against such Party in accordance with its terms, except as enforcement may be limited by applicable bankruptcy, insolvency, reorganization, moratorium or other similar laws affecting creditors' rights generally and by general principles of equity (regardless of whether considered in a proceeding in equity or at law);

(c) no approval, authorization, order, consent, declaration, registration or filing with any Governmental Authority is required for the valid execution and delivery of this Agreement by such Party, except such as have been duly obtained or made, this Agreement having been approved by County and

(d) neither the execution, delivery and performance of this Agreement, nor the consummation by such Party of the transactions contemplated herein will (i) conflict with or result in any breach of any provision of the organizational documents of such Party, or (ii) conflict with, result in any violation or breach of, constitute a default under, require any notice or consent under, result in the creation of any lien on such Party's assets, or create any right of termination, under the conditions or provisions of any note, bond, mortgage, indenture, material agreement or other instrument or obligation to which such Party is a party.

Section 8.2 Covenants of Both Parties. Each Party covenants to the other that during the Term of this Agreement it will:

(a) comply in all material respects at all times with all Applicable Laws necessary for its performance under this Agreement; and

(b) give all required Notices, and procure, maintain, and comply with, in all material respects, all applicable Permits necessary for the performance of its obligations under this Agreement, and pay all charges and fees in connection therewith.

The covenants set forth in this Section 8.2 are material to this Agreement.

ARTICLE IX EVENTS OF DEFAULT AND REMEDIES

Section 9.1 By Events of Default. The following occurrences shall constitute events of default hereunder:

(a) a Party, if such Party fails to perform any material covenant or obligation set forth in this Agreement, which is not remedied within thirty (30) Days after receipt of written Notice from the other Party of such failure, which Notice sets forth in reasonable detail the nature of the failure; provided, however, that if the failure is not reasonably capable of being cured within the thirty (30) Day cure period specified above, but is curable, the Party that has failed to perform will have such additional time as is reasonably necessary to cure the failure (but in no event longer than one hundred eighty (180) Days), so long as such Party promptly commences and diligently pursues the cure; provided, further, that an event of default shall occur immediately to the extent any such failure cannot be cured; or

(b) By a Party, if such Party (i) admits in writing its inability to pay its debts generally as they become due, (ii) files a petition or answer seeking reorganization or arrangement under the federal bankruptcy laws or any other Applicable Laws of the United States of America or any State, district, or territory thereof, (iii) makes an assignment for the benefit of its creditors, (iv) consents to the appointment of a receiver of the whole or any substantial part of its assets; (v) has a petition in bankruptcy filed against it, and such petition is not dismissed within sixty (60) Days after the filing thereof, (vi) a court of competent jurisdiction enters an order, judgment, or decree appointing a receiver of the whole, or any substantial part, of its assets, and such order, judgment or decree is not vacated or set aside or stayed within sixty (60) Days from the date of entry thereof, or (vii) under the provisions of any other law for the relief or aid of debtors, any court of competent jurisdiction shall assume custody or control of the whole, or any substantial

part, of its assets and such custody or control is not terminated or stayed within sixty (60) Days from the date of assumption of such custody or control.

Section 9.2 Remedies. Upon the occurrence of, and during the continuation of, an event of default that is not cured during any applicable cure period and for which this Agreement does not provide a specific or sole remedy, the non-defaulting Party may terminate this Agreement by Notice to the other Party, designating the date of termination and delivered to the defaulting Party no less than thirty (30) Days before such termination date. Upon the occurrence of an event of default, the non-defaulting Party may, in addition to the termination right described above and without regard to whether the non-defaulting Party terminates this Agreement, pursue all available remedies at law or in equity, subject to Section 9.3. The termination right pursuant to this Section 9.2 is in addition to any other termination rights provided elsewhere in this Agreement. The County shall have no liability to Toro under any agreement or lease between USA Waste and Toro.

Section 9.3 Limitation on Damages. THE MAXIMUM LIABILITY FROM ONE PARTY TO ANOTHER IN ANY CALENDAR YEAR SHALL BE LIMITED TO ACTUAL DIRECT DAMAGES; IN NO EVENT WILL THE LIABILITY OF USA WASTE EXCEED THE TOTAL AMOUNT PAYABLE TO THE COUNTY BY USA WASTE UNDER THIS AGREEMENT.

Section 9.4 Double Recovery; Proper Assertion of Claims. Notwithstanding the fact that a Party may have the right to seek indemnification under or with respect to more than one provision of this Agreement or any other agreement entered into in connection herewith, in respect of any fact, event, condition or circumstance, neither Party shall be entitled to recover the amount of any Losses suffered by such Party more than once under all such agreements in respect of such fact, event, condition or circumstance, and an Indemnifying Party shall not be liable for indemnification to the extent the Indemnified Party has otherwise been fully compensated for such Losses; further, each Party hereby agrees to bring any claims for indemnification or Losses under the Agreement most closely related to the events giving rise to such claim for indemnification or Loss.

ARTICLE X FORCE MAJEURE

Section 10.1 Force Majeure. As used in this Agreement, any acts, events, or occurrences that are beyond the reasonable control of such Party or any of its Personnel, only to the extent not caused by the negligence of such Party, may be considered "Force Majeure Events". Depending upon the facts and circumstances, a Force Majeure Event may include, but shall not be limited to, the following: a failure or interruption of performance due to an act of God; earthquakes; unusually severe weather conditions; quarantine; blockade; governmental acts, the delay or inability to obtain Permits or equipment despite due diligence in seeking such Permits or equipment, court orders or injunctions; war; insurrection or civil strife; sabotage; terrorism; epidemic; pandemic; and explosions.

Section 10.2 Excused Performance. A Party shall be excused from performance and shall not be considered to be in default with respect to any obligation hereunder, except the obligation to make payments previously due in a timely manner for liabilities actually incurred, if

and to the extent that its failure of, or delay in, performance is caused by a Force Majeure Event or a change in Applicable Law; provided, however, that a Party is not excused as a result of such occurrence from any obligations of such Party which arose before the occurrence causing the suspension of performance. To be entitled to the foregoing relief, the Party claiming excuse by reason of a Force Majeure Event must:

(a) give the other Party prompt Notice describing the particulars of the Force Majeure Event after the Party claiming excuse by reason of a Force Majeure Event knows of the occurrence of such event.

(b) suspend performance only to the extent and for the duration that is reasonably required by the Force Majeure Event;

(c) use commercially reasonable efforts to overcome or mitigate the effects of such occurrence; and

(d) promptly resume performance hereunder when such Party can resume performance of its obligations under this Agreement and shall give the other Party Notice to that effect.

Section 10.3 Settlement of Strikes. Nothing in this ARTICLE X shall be construed to require the settlement of any strike, walkout, lockout, or other labor dispute on terms which, in the sole judgment of the Party involved in the dispute, are contrary to such Party's interest. It is understood and agreed that the settlement of strikes, walkouts, lockouts, or other labor disputes shall be entirely within the discretion of the Party experiencing such action.

ARTICLE XI INDEMNITY

Section 11.1 Indemnification. USA Waste shall indemnify, hold harmless, and, subject to Section 11.2, defend County Persons, from and against Losses actually incurred or paid by a County Person (including in connection with the claims of third parties for injury to persons or damage to property or any proceeding by a Governmental Authority (other than County)) as a result of claims and causes of action asserted by a third party, in each case, to the extent caused by or arising from or out of (1) Toro's construction, use, operation or maintenance of the Toro Facilities, its processing of LFG, and its production, sale and distribution of RNG, or (2) USA Waste's construction, use, operation or maintenance of the USA Facilities or LFG Collection System, including:

(a) any claim by Toro related to this Agreement;

(b) any material breach by USA Waste of the representations and warranties set forth herein or in the performance of the duties and obligations of USA Waste under this Agreement;

(c) any willful misconduct or gross negligence of USA Waste or its Affiliate, representative or agent under this Agreement; and

(d) any Hazardous Substance contamination or other environmental condition, including clean-up actions or remediation work resulting therefrom, at the Landfill, whether now known or hereafter discovered, caused by Toro or its Affiliate, representative or agent.

For the avoidance of doubt and except to the extent caused by or arising from or out of County's negligence or willful misconduct, County will not be responsible for any Losses arising from the Toro Facilities, USA Waste Facilities, LFG Collection System, or RNG processing.

Section 11.2 Notice and Defense of Claims.

(a) Whenever facts or circumstances shall arise which the County believes may give rise to a claim for indemnification and/or defense hereunder, including but not limited to County receiving notice of an indemnifiable claim identified in Section 11.1, the County (the "Indemnified Party") shall, upon receiving a written claim arising from this Agreement, give written Notice to USA Waste (the "Indemnifying Party") of the facts, in reasonable detail, constituting the basis for such claim and whether County will be seeking indemnification and/or defense from USA Waste in connection with such claim, facts or circumstances; an Indemnified Party's failure to give written Notice in compliance with this Section 11.2 shall relieve the Indemnifying Party of its indemnification obligations under Section 11.1, but only to the extent prejudiced by such delay, but shall not relieve such Indemnifying Party of its liability in connection with such claim.

(b) The obligations and liabilities of an Indemnifying Party to an Indemnified Party under this ARTICLE XI shall be subject to the following conditions:

(i) The Indemnifying Party may assume, at its sole option, control of the defense, appeal, or settlement of any third-party claim that is reasonably likely to give rise to an indemnification claim under Section 11.1 through reputable independent counsel of its own choosing (at its own expense) by sending written notice to the Indemnified Party acknowledging and assuming responsibility for the defense of the Indemnified Party;

(ii) In any claim initiated by a third party and defended by the Indemnifying Party, (A) the Indemnified Party shall have the right to be represented by advisory counsel and accountants at its own expense, (B) the Indemnifying Party shall keep the Indemnified Party fully informed as to the status of such claim at all stages thereof, whether or not the Indemnified Party is represented by its own counsel, and (C) the Indemnified Party shall fully cooperate and assist the Indemnifying Party in order to ensure the proper and adequate defense of such claim; and

(iii) No third-party claim may be compromised or settled by the Indemnifying Party without the written consent of the Indemnified Party, which consent shall not be unreasonably withheld, conditioned, or delayed. Notwithstanding the foregoing, written consent of the Indemnified Party shall not be required where (A) there is no finding or admission of any violation of Applicable Law by the Indemnified Party, and no effect on any other claims that may be raised by the Indemnified Party, and (B) the sole relief provided is monetary damages that are paid in full by the Indemnifying Party. Similarly, no third-party claim may be settled by the Indemnified Party without the written

consent of the Indemnifying Party, which consent shall not be unreasonably withheld, conditioned, or delayed.

Section 11.3 Survival. Notwithstanding any other provisions in this Agreement, all provisions of this ARTICLE XI shall survive expiration or termination of this Agreement by default or otherwise until the fifth anniversary of such expiration or termination.

ARTICLE XII ASSIGNMENT

This Agreement and all of the provisions hereof shall be binding upon and inure to the benefit of the Parties and their respective successors and permitted assigns (including by operation of law). Neither this Agreement nor any of the rights, interests or obligations hereunder shall be assigned by either Party without the prior written consent of the other Party, which consent shall not be unreasonably withheld, conditioned or delayed; provided, however, that USA Waste may assign this Agreement to any Affiliate and to any successor to USA Waste whether by operation of law, merger, sale of all or substantially all of its assets, reorganization or similar type of transaction.

ARTICLE XIII MISCELLANEOUS

Section 13.1 Notices. All notices hereunder shall be in writing, and shall be deemed given when received if delivered personally, or by facsimile transmission with completed transmission acknowledgment, or by electronic mail, or when delivered if mailed by overnight delivery via a nationally recognized courier or registered or certified first class mail (return receipt requested), postage prepaid, to the recipient Party at its below address (or at such other address or facsimile number for a Party as shall be specified by like notice; provided, however, that notices of a change of address shall be effective only upon receipt thereof and that any notice provided by electronic mail will be followed promptly by another form of notice consistent with this Section 13.1 and will be effective when such follow-up notice is deemed effective:

If to County: Clerk of the Board of Supervisors
County of Riverside
4080 Lemon Street, 1st Floor
Riverside, California 92501
Email: cob@rivco.org

with copies to: General Manager-Chief Engineer
Riverside County Department of Waste Resources
14310 Frederick Street
Moreno Valley, California 92553
Email: acortez@rivco.org and wasteplanning@rivco.org

If to USA Waste: USA Waste of California, Inc.
10901 Dawson Canyon Road
Corona, California 92877-0130
Attn: Senior District Manager
Email: dmeyer9@wm.com

with copies to: USA Waste of California, Inc.
9081 Tujunga Ave.
Sun Valley, California 91352
Attn: President – Southern California Area
Email: mhammer@wm.com

USA Waste of California, Inc.
9081 Tujunga Ave.
Sun Valley, California 91352
Attn: Asst. General Counsel - West
Email: akhajeto@wm.com

Each Party may designate a different address for notices by notice given as provided above.

Section 13.2 Governing Law, Jurisdiction, Venue. This Agreement shall be governed by and interpreted in accordance with the laws of the State of California, without giving effect to any conflicts of law or other principles thereof that would result in the application of the laws of another jurisdiction. The Parties hereby irrevocably submit to the non-exclusive jurisdiction of the courts of the State of California with respect to the enforcement of any judgment for the resolution of a dispute as set forth in Section 13.3 or any suit, action, or proceeding, including an action for an order of interim, provisional, or conservatory measures to maintain the status quo and prevent irreparable harm, and the Parties agree that any legal action related to the performance or interpretation of this Agreement shall be filed only in a Superior Court of the State of California located in Riverside, California, or in the Eastern Division of the Central District of California, and hereby irrevocably waive any objection to the laying of venue or defense that the forum is inconvenient with respect to any such suit, action, or proceeding for such.

Section 13.3 Dispute Resolution.

(a) In the event a dispute, controversy, or claim (a “Dispute”) arises hereunder, including any claim whether in contract, tort (including negligence), strict product liability, or otherwise, the aggrieved Party will promptly provide written notification of the Dispute to the other Party as soon as reasonably practicable after knowledge of such dispute arises. Thereafter, a meeting shall be held promptly between the Parties, attended by representatives of the Parties with decision-making authority regarding the Dispute, to attempt in good faith to negotiate a resolution of the Dispute (“Party Representative Negotiations”).

(b) If the Parties are not successful in resolving a Dispute through Party Representative Negotiations within sixty (60) Days of such meeting, and if either Party wishes to pursue the Dispute, then, subject to the limitations on remedies set forth in Section 9.2, such Dispute shall be addressed through non-binding mediation under the Commercial Mediation Rules

of the American Arbitration Association (“AAA”). A single mediator engaged in the practice of law who is knowledgeable about the type of Dispute, will conduct the mediation under the then-current rules of the AAA. Any mediation under this Agreement shall be conducted in the County of Riverside, California.

(c) If such Dispute cannot be resolved through non-binding mediation within sixty (60) Days following the request for such mediation, then either Party may proceed with filing a lawsuit in state or federal court in California with jurisdiction to adjudicate such claim.

Section 13.4 Counterparts. This Agreement may be executed in two or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument. Signatures delivered by facsimile, portable document format or other electronic means (including services such as DocuSign) will be considered original signatures, and each Party shall thereafter promptly deliver original signatures to the other Party.

Section 13.5 Waiver of Compliance; Consents. Except as otherwise provided in this Agreement, any failure of any of the Parties to comply with any obligation, covenant, agreement or condition herein may be waived by the Party entitled to the benefits thereof only by a written instrument signed by the Party granting such waiver, provided, however, any such waiver of such obligation, covenant, agreement or condition shall not operate as a waiver of, or estoppel with respect to, any subsequent failure to comply therewith.

Section 13.6 No Third-Party Beneficiaries. Except as otherwise specified herein, (a) nothing in this Agreement nor any action taken hereunder shall be construed to create any duty, liability, or standard of care to any Person that is not a Party, (b) no Person that is not a Party shall have any rights or interest, direct or indirect, in this Agreement or the services to be provided hereunder and (c) this Agreement is intended solely for the benefit of the Parties, and the Parties expressly disclaim any intent to create any rights in any third-party as a third-party beneficiary to this Agreement or the services to be provided hereunder.

Section 13.7 Interpretation. All headings contained in this Agreement are solely for the purpose of reference, are not part of the agreement of the Parties, and shall not in any way affect the meaning or interpretation of this Agreement.

Section 13.8 Severability. If any term or other provision of this Agreement is invalid, illegal, or incapable of being enforced by any rule of law or public policy, all other conditions and provisions of this Agreement shall nevertheless remain in full force and effect so long as the economic or legal substance of the transactions contemplated hereby is not affected in any manner materially adverse to any Party.

Section 13.9 Entire Agreement. This Agreement, including the recitals hereto and all schedules, attachments or exhibits attached hereto, constitutes the entire agreement between the Parties concerning the subject matter hereof, which supersedes all previous written and oral negotiations, commitments, proposals, and writings. This Agreement may be amended modified or supplemented only by written agreement of the Parties. To the extent that there is any conflict between the provisions of the body of this Agreement and the provisions of any schedule, attachment or exhibit attached hereto, the body of this Agreement shall control.

Section 13.10 Construction of Agreement. The terms and provisions of this Agreement represent the results of negotiations between the Parties, each of which has been represented by counsel of its own choosing, and neither of which has acted under duress or compulsion, whether legal, economic, or otherwise. Accordingly, the terms and provisions of this Agreement shall be interpreted and construed in accordance with their usual and customary meanings, and each Party hereby waives the application in connection with the interpretation and construction of this Agreement of any rule of law to the effect that ambiguous or conflicting terms or provisions contained in this Agreement shall be interpreted or construed against the Party whose attorney prepared the executed draft or any earlier draft of this Agreement.

Section 13.11 Further Assurances. Each Party agrees to execute and deliver such additional documents and instruments and to perform such additional acts as may be necessary or appropriate to effectuate, carry out, and perform all of the terms, provisions, and conditions of this Agreement and the transactions contemplated by this Agreement.

Section 13.12 No Partnership. Nothing contained in this Agreement shall be construed to create any association, trust, partnership, or joint venture or impose a trust or partnership duty, obligation, or liability or an agency relationship on, or with regard to, either Party.


Section 13.13 Liens. The County shall not incur or create any liens, levies or encumbrances of any nature or kind on the Landfill or the LFG Collection System, or any other USA Waste property, whether real or personal, arising from or relating to this Agreement.

Section 13.14 California Public Records Act. The County and USA Waste acknowledge and agree that this Agreement and any information provided by USA Waste to the County may be subject to the California Public Records Act ("CPRA"). County acknowledges that USA Waste may consider certain records, reports, or information contained herein or required to be provided to the County under this Agreement, to be of a proprietary or confidential nature. At such time as the County receives a request for records under the CPRA or Federal Freedom of Information Act or a subpoena or other court order requesting disclosure of records that are marked or identified by USA Waste as proprietary or confidential, the County shall notify USA Waste of the request, subpoena, or order and of the County's obligation and intent to provide a response within ten (10) days. USA Waste shall within five days either: (i) consent in writing to the disclosure of the records; or (ii) seek and obtain, at USA Waste's sole cost and expense, the order of a court of competent jurisdiction staying or enjoining the disclosure of the records.

[Signatures on Following Page]

WITNESS WHEREOF, each of the Parties has caused this Agreement to be executed by a duly-authorized representative as of the date first written above.


COUNTY

By: 
Name: Chuck Washington
Title: Chairman, Board of Supervisors

RECOMMENDED FOR APPROVAL:

By: Andy Cortez
Digitally signed by Andy Cortez
Date: 2024.10.29 11:11:47 -07'00'

Andy Cortez
General Manager-Chief Engineer

ATTEST: **ATTEST:**
KIMBERLY A. RECTOR, Clerk
By: 
DEPUTY

Clerk of the Board

APPROVED AS TO FORM:


Braden Holly
Deputy County Counsel

USA Waste of California, Inc.

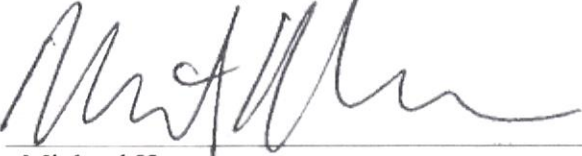
By: 
Name: Michael Hammer
Title: President - Southern California Area

EXHIBIT A

Construction Schedule

EXHIBIT A

CONSTRUCTION SCHEDULE Toro Energy RNG Facility

PHASE	DESCRIPTION	SCHEDULE ⁽¹⁾
1A	North And South RNG sites rough grading (including over-excavation) and underground utility trenches connecting the three locations (POR, North & South RNG) along the main haul road (Dawson Canyon Road).	Q4 2024 – Q2 2025
1B	Point of Receipt (POR) for Southern California Gas grading.	Q3 2025 – Q1 2026
2A	North And South RNG sites precise grading and drainage.	Q2 2025 – Q3 2025
2B	North And South RNG site foundations, structures, and equipment. Includes structural, architectural, mechanical, plumbing, & electrical plans.	Q3 2025 – Q4 2025
3	Mechanical process piping for North & South RNG sites.	Q4 2025 – Q1 2026

(1) Schedule is subject to change based on permit approvals.

Renewable Natural Gas Facility at the El Sobrante Landfill

**Addendum to the Environmental Impact Report for the El
Sobrante Landfill Expansion (SCH# 1990020076) & the El
Sobrante Landfill Solid Waste Facility Permit Revision
Supplemental Environmental Impact Report
(SCH# 2007081054)**

**Riverside County Department of Waste Resources
14310 Frederick Street
Moreno Valley, CA 92553**

September 2024

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Appendix H	Flood Risk Summary Memo
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1.0 Introduction

1.1 Purpose of the Addendum

An Environmental Impact Report (EIR) for the El Sobrante Landfill was certified by the Riverside County Board of Supervisors on September 1, 1998 (State Clearinghouse [SCH] No. 1990020076). That EIR, comprised of the April 1994 Draft EIR, the April 1996 Final EIR, and the July 1998 Update to the Final EIR, was prepared to address the El Sobrante Landfill Expansion Project (herein, 1998 EIR) and found all impacts would be reduced to below a level of significance with implementation of mitigation measures identified in the 1998 EIR.

In 2009, a Supplemental EIR (SEIR) (herein, 2009 SEIR) was certified by the Riverside County Board of Supervisors on March 31, 2009 (SCH No. 2007081054). The 2009 SEIR analyzed a proposed revision to the El Sobrante Landfill Solid Waste Facility Permit (SWFP) for allowing acceptance of waste material over a continuous 24-hour period and changing the maximum tonnage limit to a weekly tonnage limit of 70,000 tons per week (tpw) not to exceed 16,054 tons per day (tpd). The 2009 SEIR analyzed potential environmental impacts associated with aesthetics, air quality, noise, public health and safety, and transportation and circulation, and determined that the proposed revision to the SWFP would not result in any new environmental impacts that were not previously accounted for, and mitigated by, the 1998 EIR. The numbering of some mitigation measures identified in the 1998 EIR Mitigation and Monitoring Plan (MMP) were changed in the 2009 SEIR to reflect the completion of mitigation requirements and/or to omit mitigation measures that no longer applied since certification of the 1998 EIR. Additionally, various Addenda have been prepared to the 1998 EIR/2009 SEIR, one of which resulted in the modification of the MMP (mitigation measure N-1 was modified). The latest Addendum prepared to the 1998 EIR/2009 SEIR is dated January 2018 and it analyzed the reduction and reconfiguration of the overall limit of grading; incorporation of and revision to a previously considered conceptual drainage plan for the El Sobrante Landfill (landfill); and construction of a new equipment maintenance shop on the northern portion of the landfill site (2018 Addendum).

1.2 Legal Authority

According to the California Environmental Quality Act (CEQA) Guidelines Section 15164(a), the lead agency or 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. (CEQA Guidelines, § 15164, subd. (a); see also Pub. Resources Code, § 21166.) Section 15162 of the CEQA Guidelines lists the conditions that would require the preparation of a subsequent EIR rather than an addendum. These include the following:

- (a) 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;
- (b) 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

- (c) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
- (i) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (ii) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (iii) 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
 - (iv) 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.

Where a lead agency determines that neither substantial changes in the project, changed circumstances, nor new information triggers the need for an EIR, “the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.” (CEQA Guidelines, § 15162, subd. (b); see also CEQA Guidelines § 15164, subd. (b).)

In *Friends of College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal.5th 937, 949 (“*Friends*”), the California Supreme Court explained that “[o]nce a project has been subject to environmental review and received approval, [Public Resources Code] section 21166 and CEQA Guidelines section 15162 limit the circumstances under which a subsequent or supplemental EIR must be prepared. These limitations are designed to balance CEQA’s central purpose of promoting consideration of the environmental consequences of public decisions with interests in finality and efficiency.” The subsequent review provisions, accordingly, are “designed to ensure that an agency that proposes changes to a previously approved project “explore[s] environmental impacts *not* considered in the original environmental document” (*id.* at p. 951 [italics added]). “This assumes that at least some of the environmental impacts of the modified project were considered in the original environmental document, such that the original document retains some relevance to the ongoing decision-making process. A decision to proceed under CEQA’s subsequent review provisions must thus necessarily rest on a determination—whether implicit or explicit—that the original environmental document retains some informational value” (*ibid.*). Consistent with these legal principles and CEQA Guidelines provisions governing subsequent review, the Riverside County Department of Waste Resources (RCDWR) prepared the analysis below in order to determine whether any of the conditions described in section 15162 of the CEQA Guidelines calling for preparation of a subsequent EIR have occurred.

Based on these considerations, preparation of an Addendum to the certified 1998 EIR/2009 SEIR was deemed appropriate to comply with CEQA for the proposed Renewable Natural Gas (RNG) Facility at El Sobrante Landfill Project (proposed project); refer to Section 2.0, Project Description, for specific details). This Addendum appropriately focuses only on those aspects of the proposed project or its impacts that require additional discussion in light of the environmental analysis already found in the 1998 EIR/2009 SEIR and related CEQA documents (see *Friends, supra*, 1 Cal.5th at p. 951).

The RCDWR evaluated the environmental conditions associated with the proposed project, which are described in Section 2.0 of this Addendum, in light of the requirements defined under CEQA. In addition, RCDWR evaluated the potential impacts of the proposed project using an Initial Study/Modified Environmental Checklist (see Section 3.0 of this Addendum), which is the means for providing the required documentation.

1.3 Incorporation by Reference

State CEQA Guidelines §15150 allows for an EIR to “...incorporate by reference all or portions of another document...Incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand.” Several documents have been completed for the project site, including the 1998 EIR and 2009 SEIR. The 1998 EIR and 2009 SEIR are herein incorporated by reference and are available at the RCDWR, 14310 Frederick Street, Moreno Valley, CA 92553. In addition, the Second El Sobrante Landfill Agreement (1998), the First, Second, Third, and Fourth Amendments to the Second El Sobrante Landfill Agreement (2003, 2007, 2012, and 2015, respectively), First Amended and Restated Second El Sobrante Landfill Agreement (2018), and the SWFP for the El Sobrante Landfill are herein incorporated by reference and are available with the RCDWR, at the above-listed address.

Another document, entitled, “Joint Technical Document, El Sobrante Landfill, Riverside, CA” (revised November 2023), was prepared to satisfy the Report of Waste Discharge Requirements (ROWD) found in California Code of Regulations (CCR), Title 27, §21585 and the Report of Disposal Site Information requirements found in CCR Title 27, §21600. This document is herein incorporated by reference, and is available at the Riverside County Department of Environmental Health, Local Enforcement Agency, located at 4080 Lemon Street, Riverside, CA 92501.

Table 1-1, Pertinent and Related Documents, provides a summary of the existing and related documents pertaining to the proposed project.

Table 1-1: Pertinent and Related Documents

Document Type	Date	Description
Draft EIR for the El Sobrante Landfill Expansion Project	June 1994	CEQA compliance documentation to add 1,144 acres to the landfill site, for a total of 1,322 acres; to expand the overall waste disposal capacity of the landfill from approximately eight (8) million tons to approximately 108 million tons, or 196.11 million cubic yards; to increase acceptable daily tonnage from 4,000 to 10,000 tpd, and to permit waste disposal operations from 4:00 AM to 12:00 Midnight, seven (7) days per week, with the exception of holidays designated by the County.
Final EIR for the El Sobrante Landfill Expansion Project	April 1996	
Update to Final EIR for the El Sobrante Landfill Expansion Project	July 1998	
Second El Sobrante Landfill Agreement	September 1, 1998	Public-private agreement between County of Riverside and USA Waste of California, Inc., for the expansion (as described above) and operation of the El Sobrante Landfill. The Second Agreement superseded the original agreement and the six (6) subsequent amendments thereto.

Document Type	Date	Description
First Amendment to Second El Sobrante Landfill Agreement	June 20, 2003	Permits the construction and operation of a landfill gas to energy facility and a yard trimmings chipping, grinding and processing facility at the landfill.
Second Amendment to Second El Sobrante Landfill Agreement	March 12, 2007	Allows for USA Waste of California, Inc. to seek regulatory approvals for proposed operational changes, sets disposal rates, requires the diversion of some County Waste from the landfill into a County owned or operated landfill, and increases the aggregate capacity reserved for County waste at the landfill.
Draft SEIR	December 22, 2008	CEQA compliance document for continuous 24-hour acceptance of waste material for disposal, up to 7 days a week, and a change from a maximum daily capacity (10,000 tons per day) to a weekly disposal capacity limit (70,000 tons per week not exceeding 16,054 tons per day).
Final SEIR	March 31, 2009	
Current Solid Waste Facility Permit #33-AA-0217	September 9, 2009	Permit allows 70,000 tons per week (16,054 tons per day maximum daily peak) of waste to be disposed within 468 acres and a maximum of 1,305 daily vehicle trips
Third Amendment to Second El Sobrante Landfill Agreement	December 18, 2012	Changed hours for existing and future excavation and liner construction activities in new landfill cells, which resulted in a revised MMP being adopted for the landfill.
Fourth Amendment to Second El Sobrante Landfill Agreement	March 24, 2015	Revised a definition for “Non-hazardous Solid Waste” to remove conflicting language from the Second Agreement, which allowed for the continued acceptance of a non-hazardous material (incinerator ash) at the landfill. This amendment also substituted a State-approved financial assurance mechanism for Closure/Post-Closure Maintenance.
Addendum to the EIR for the El Sobrante Landfill Expansion & the El Sobrante Landfill SWFP Revision Supplemental EIR	January 2018	CEQA compliance document for reduction and reconfiguration of the overall limit of grading; incorporation of and revision to a previously considered conceptual drainage plan for the El Sobrante Landfill; and construction of a new equipment maintenance shop on the northern portion of the landfill site.
First Amended and Restated Second El Sobrante Landfill Agreement	July 2018	A public-private agreement between County of Riverside and USA Waste of California, Inc. that was approved by the County Board of Supervisors on July 17, 2018. The primary intent of the new agreement was to consolidate and combine the Second Agreement and its four amendments into a single document. This agreement also incorporated Ponds 3 and 4, as well as the new maintenance facility, into the landfill’s permitted disturbance limits.
Joint Technical Document, El Sobrante Landfill, Riverside, CA	November 2023	Provides operational characteristics at the landfill in conformance with the ROWD found in CCR, Title 27, §21585, and the Report of Disposal Site Information requirements found in CCR Title 27, §21600.

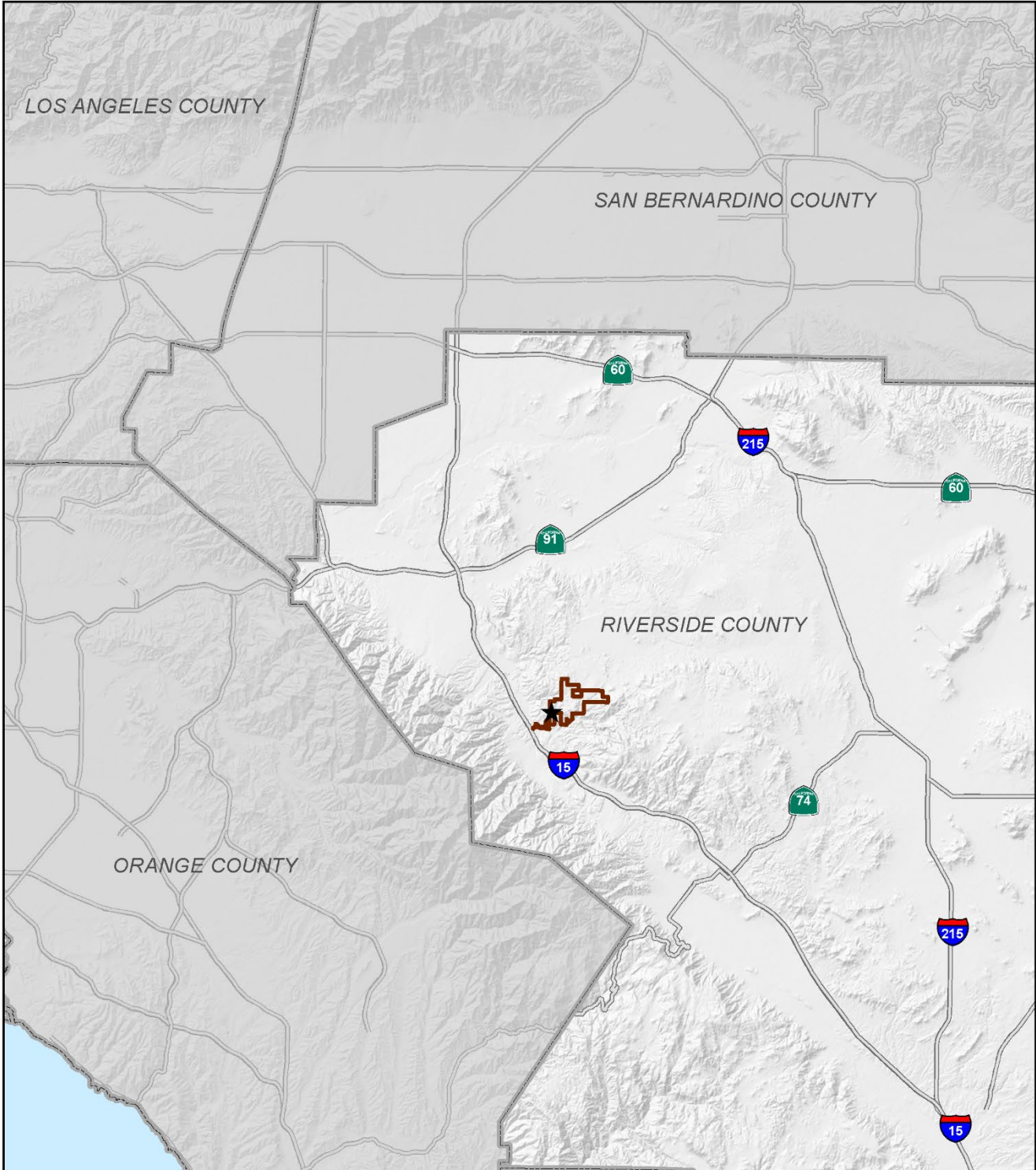
2.0 Project Description

The proposed project is the installation of a RNG Facility at the Waste Management (WM)'s El Sobrante Landfill (see Figures 1 and 2 for regional and vicinity maps) to utilize landfill gas (LFG) that would be diverted from existing landfill flares and processed to meet Southern California Gas Company (SoCal Gas) specifications for local distribution via an existing SoCal Gas pipeline. The proposed project is addressed as an acceptable onsite use, consistent with future development plans for beneficial use of LFG as a fuel source, in the current (2023) El Sobrante Landfill Joint Technical Document (JTD). Specifically, Section 3.1.6, Landfill Gas Control/Recovery Systems, of the 2023 JTD identifies:

*“The LFG may be used to produce electricity, produce liquid natural gas, renewable natural gas (RNG), or other beneficial use. The LFG cogeneration plant was decommissioned in 2016 and USA Waste currently has plans to develop an RNG plant onsite. Any LFG not used at the RNG facility will be directed to the flare station which is sized to handle all LFG currently generated at the facility. **The RNG Facility will process existing LFG that will be diverted from the existing flares, processed to meet SoCal Gas specifications, and sold to SoCal Gas through a Point of Receipt (POR) for local distribution.** The proposed RNG improvements will be located within three previously disturbed areas within WM owned property at ESL (see Figure 11-1). The RNG Location Map indicate the three locations designated as South RNG Site, North RNG Site, and Gas POR.”*

Figure 11-1, Renewable Natural Gas Location Map, of the 2023 JTD identifies where the future development plans for an RNG plant are intended to be located, which is consistent with the proposed project (as detailed below). Toro Energy of California – El Sobrante, LLC (Toro) has entered into a property lease agreement with WM to install and operate the proposed RNG Facility within three previously disturbed areas, which would involve the following elements (see Figure 3): a South RNG Site; a North RNG Site; a Gas Point of Receipt (POR) Site; underground piping within pipe trenches connecting the three sites for the purpose of conveying LFG, processed gas, and other necessary lines for the RNG process; and an underground pipeline interconnection between the Gas POR Site and SoCal Gas' existing main pipeline located in Temescal Canyon Road.

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Source: ESRI; Waste Management, Toro Energy, and AECOM (2024)

- ★ Project Location
- ▭ El Sobrante Landfill
- ▭ County Boundaries

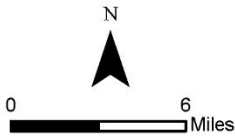
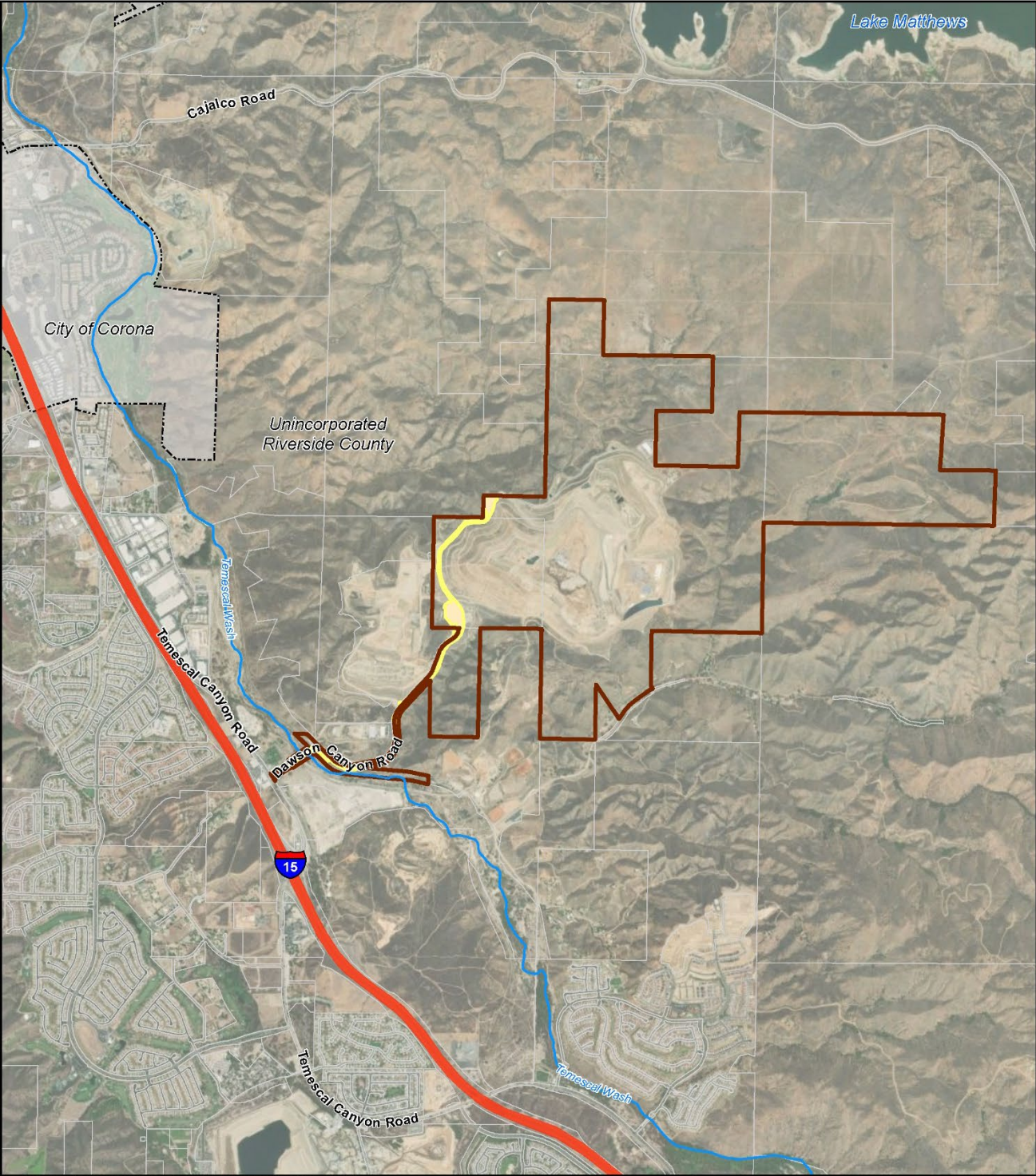


Figure 1
Regional Map

RNG Facility Project
at El Sobrante Landfill



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Source: ESRI; Waste Management, Toro Energy, and AECOM (2024)

- RNG Facility Project Area
- El Sobrante Landfill
- Parcel Boundaries

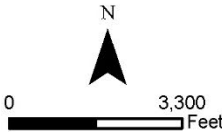
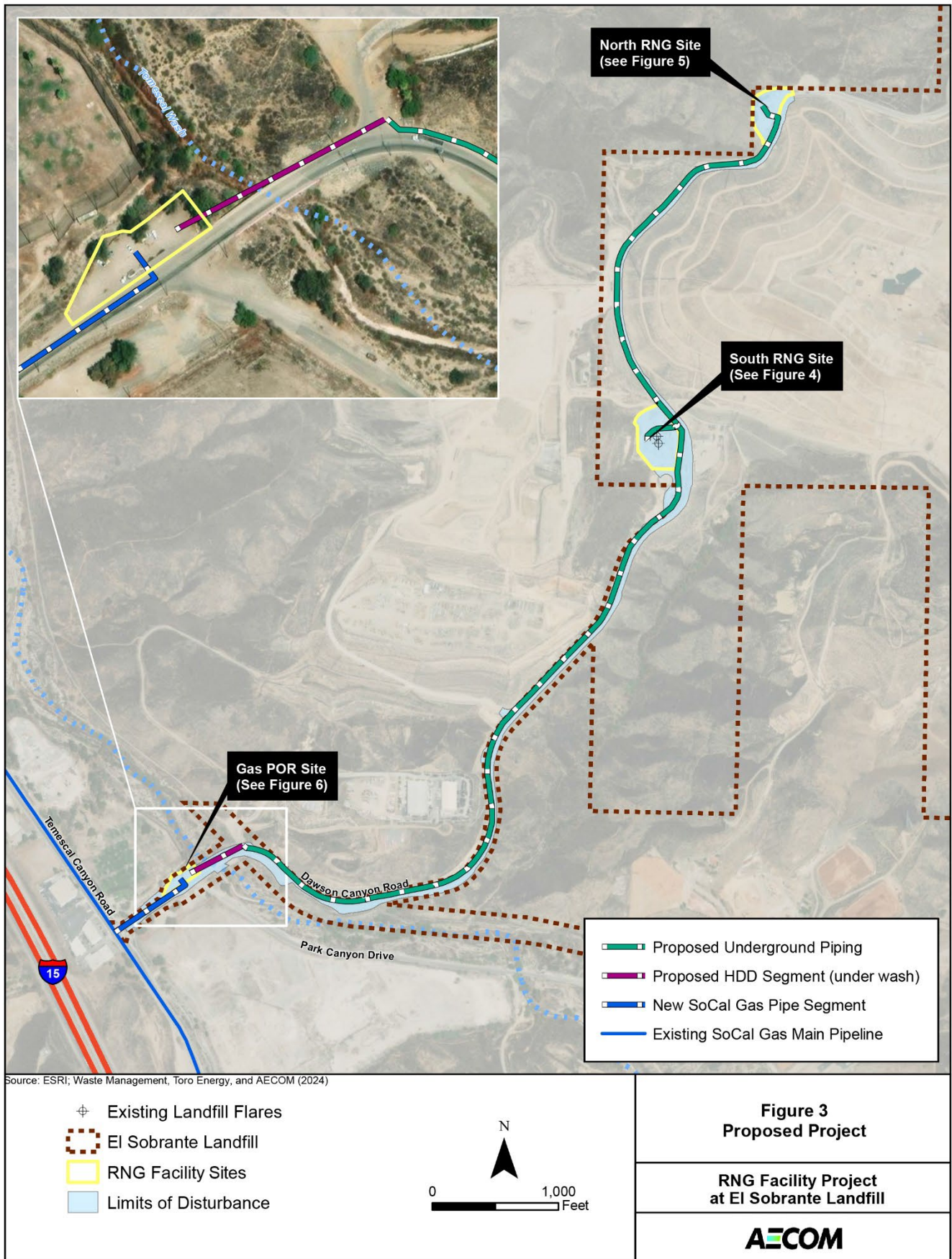


Figure 2
Vicinity Map

RNG Facility Project
at El Sobrante Landfill

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2.1 South RNG Site

The South RNG Site would be an approximately 0.3-acre area located adjacent to El Sobrante Landfill's two existing LFG flares (flare station) (see Figure 4). The 0.3-acre area currently contains three concrete pads that were previously used for co-gen power generation; these existing concrete pads would be removed and replaced with concrete specifically designed for the equipment to be utilized at the site. The South RNG Site location is part of a larger graded area associated with the existing landfill entry and scales.

The RNG process would begin at the South RNG Site through the interception of LFG by tapping into the discharge manifold header piping prior to the gas being burned at the existing flare station. The diverted, raw LFG would be conveyed to the North RNG Site utilizing a 30-inch diameter pipe to be placed in an underground pipe trench within the existing pavement or shoulder of the landfill access road (see Section 2.4 for pipe trench and piping details). The North RNG Site would treat LFG (see Section 2.2 for details) that meets minimum specifications for processing; LFG that does not meet minimum specifications would be returned within a separate pipe (LFG reject line) in the same pipe trench back to the South RNG Site to be reprocessed through the RNG plant.

After the initial treatment process at the North RNG Site, the partially treated gas would be sent via another pipe in the pipe trench to be refined at the South RNG Site (i.e., final nitrogen removal) sufficient to meet SoCal Gas specifications. It would then be diverted via a sales gas compressor to a dedicated underground sales gas main to be placed within an underground pipe trench within the existing pavement or shoulder of the landfill access road/Dawson Canyon Road (see Section 2.4) and sent southward to the Gas POR Site (see Section 2.3). Waste gas from the refining process would be sent (via separate pipe in the pipe trench) to the recuperative oxidizer at the North RNG site for further treatment and release. Condensate generated from the RNG facility would be treated on-site at the South RNG Site with Double-Stage Forward Osmosis and Reverse Osmosis (DFRO) process equipment. Any permeate generated from this process that meets industrial waste requirements would be sent to the Temescal Valley Water District sanitary system. Solids would be trucked off to a facility that is permitted to accept the solids. Ancillary equipment to be located at the South RNG Site would include sales gas compressors, nitrogen rejection units, condensate treatment equipment, gas coolers, various tanks, transformers/switch gear, and a utilities building. The South RNG Site would also include an approximately 3,200-square foot (SF) maintenance and office building, which would be used as an equipment control center as well as for routine equipment maintenance required for the RNG Facility (e.g., instrument repair/swap out, inspections, oil and filter parts for compressor changes, etc.). For vehicle access to, and parking at, the South RNG Site a 25-foot-wide access easement would be dedicated between the proposed equipment and structures at the South RNG Site and the existing flare station. Building and equipment heights at the South RNG Site would typically range between 5 and 12 feet above ground surface, but with the housing for the nitrogen rejection units being 80 feet above ground surface.

2.2 North RNG Site

The North RNG Site would be an approximately 1.2-acre area on an existing graded landfill pad, approximately 0.5-mile north of the South RNG Site. This pad currently contains the landfill's former maintenance shop, a trailer, a concrete pad, a 40,000-gallon reclaimed water storage tank, and potable water booster tanks. The North RNG Site is where initial treatment/refining of the LFG would occur and is referred herein as the 'RNG Facility' (see Figure 5). The RNG Facility would require removal of the existing concrete pads, the existing canopy structure of the former maintenance facility, and the existing trailer. The existing water storage tank and potable water booster tanks would be protected in place (i.e., these tanks would not be part of the 1.2-acre RNG Facility). The RNG Facility would consist of various

equipment, which would be located on separate concrete pads with above and below ground pipe connections. Equipment would include scrubbers, blowers, coolers, LFG compressors, absorbers, strippers, oxidizers, exchangers, filters, tanks, amine treatment, utilities building, motor control center building, etc., with heights ranging from 5 to 80 feet above ground surface. The RNG Facility would be bordered by 12-foot-high fencing with colored slats (to match the adjacent natural terrain) with sound-attenuating drapes on the inside of the fence.

Once the gas has met certain carbon dioxide (CO₂), hydrogen sulfide (H₂S), volatile organic compounds (VOCs), and moisture concentrations it would be diverted via the amine treatment and hydration unit back to the South RNG Site for final nitrogen removal and compression into a 6-inch sales gas main to be placed in an underground pipe trench within the existing pavement or shoulder of the landfill access road between the South RNG and Gas POR Sites (see Section 2.4). All condensate collected at the North RNG Site will be diverted to the South RNG Site for treatment (see Section 2.1).

2.3 Gas POR Site

The RNG process concludes at the 0.2-acre SoCal Gas POR Site that will be located at the southwest portion of the El Sobrante Landfill within the existing shoulder turnout approximately 600 feet northeast of the Temescal Canyon Road and Dawson Canyon Road intersection (see Figure 6). A temporarily closed Temescal Driving Range is located to the north, and a potential future Temescal Valley Commercial Center (TVCC) development area is located to the south (across Dawson Canyon Road), of the Gas POR Site. The 6-inch sales gas RNG main will be brought to the POR underground via horizontal directional drilling (HDD) beneath Temescal Canyon Wash (see Section 2.4) and brought to grade/connected within the fence-enclosed POR. SoCalGas will have various pieces of equipment to receive the RNG, including gas analyzer, gas odorant equipment, electrical equipment, etc., that would be housed within shelters or canopies. Equipment at the POR would be supported on concrete slabs to be placed above 3- to 5-feet of over excavation of the existing onsite soils. The overall POR facility would be on a raised fill pad so that it is one foot above the base flood elevation. An approximately 3-foot-high masonry retaining wall would support the fill on its southern side between Dawson Canyon Road and an internal POR access road/driveway. The entire POR facility would be surrounded by 6-foot-high decorative fencing. It will be installed, owned, and maintained by SoCal Gas.

2.4 Underground Piping

Between the South RNG Site and North RNG Site an approximate 5-foot-8-inch wide by 8.5-foot-deep pipe trench, approximately 3,700 linear feet in length, would be installed via open cut trenching within the existing pavement or shoulder of the landfill access road. This pipe trench would house six separate lines: a 30-inch, high-density polyethylene (HDPE) LFG supply line to send raw LFG to the RNG plant; a 6-inch FlexSteel line to send partially treated gas from North RNG Site to the exchanger at the South RNG Site for semi-treatment; a 12-inch HDPE line to send partially treated waste gas from the South RNG Site to the recuperative oxidizer at the North Site for further treatment and release; a 4-inch HDPE fuel gas line to service the recuperative oxidizer and amine heater at the North RNG Site; a 20-inch HDPE LFG reject line from the North to South site to the existing flare station; and a 2-inch HDPE condensate line.

Between the South RNG Site and the north side of Temescal Canyon Wash (opposite the Gas POR Site) an approximate 4-foot-wide by 5-foot-deep pipe trench, approximately 6,700 linear feet in length, would be installed via open cut trenching (within the existing pavement or shoulder of the landfill access road/Dawson Canyon Road). This pipe trench would house four separate lines: a 6-inch FlexSteel sales gas main delivering RNG to the POR; a 6-inch FlexSteel reject gas line for rejected gas from the POR

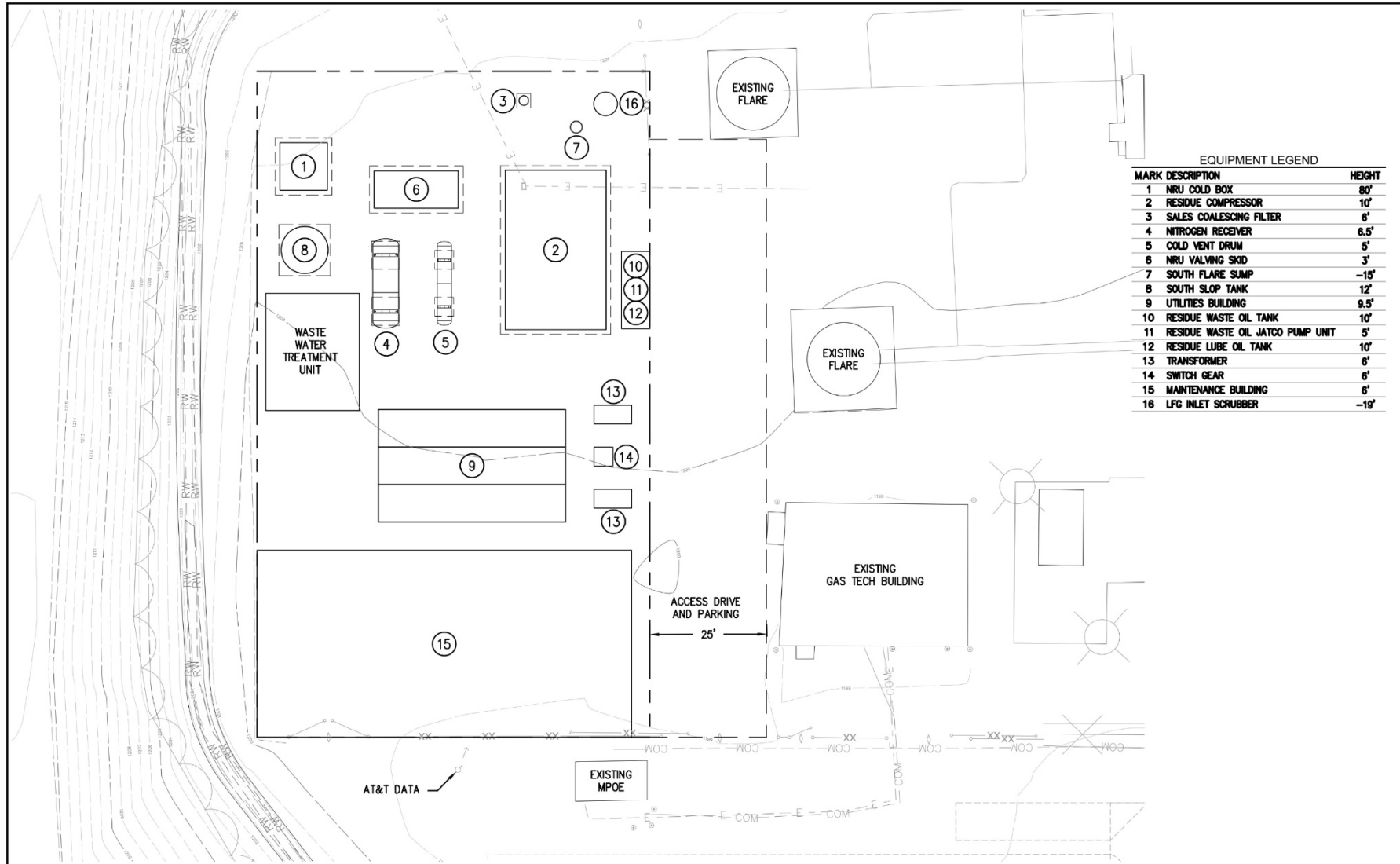
back to South RNG Site; a 4-inch HDPE fuel gas line (from a service meter tap near the POR) to the North RNG Site; and a 4-inch treated condensate force main from the South RNG Site to a manhole at the Dawson Canyon Road Bridge.

Underground piping would then be accomplished via HDD boring to cross beneath, and avoid disturbance of, Temescal Canyon Wash. One bore of approximately 500 linear feet for the two 6-inch lines (sales gas and rejected gas lines) and the 4-inch fuel gas line would be drilled beneath the wash with minimum depth of 20 feet below the surface at the center of the wash.

2.5 SoCal Gas Pipeline Interconnection

The RNG will ultimately be delivered to SoCal Gas' main pipeline located underground in the public right-of-way within Temescal Canyon Road, approximately 600 linear feet southwest from the POR. This would require approximately 600 feet of trenching performed by SoCal Gas within Dawson Canyon Road (between the Gas POR Site and existing SoCal Gas main pipeline) to install an underground pipeline interconnection between the POR and existing main pipeline.

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EQUIPMENT LEGEND

MARK	DESCRIPTION	HEIGHT
1	NRU COLD BOX	80'
2	RESIDUE COMPRESSOR	10'
3	SALES COALESCING FILTER	6'
4	NITROGEN RECEIVER	6.5'
5	COLD VENT DRUM	5'
6	NRU VALVING SKID	3'
7	SOUTH FLARE SUMP	-15'
8	SOUTH SLOP TANK	12'
9	UTILITIES BUILDING	9.5'
10	RESIDUE WASTE OIL TANK	10'
11	RESIDUE WASTE OIL JATCO PUMP UNIT	5'
12	RESIDUE LUBE OIL TANK	10'
13	TRANSFORMER	6'
14	SWITCH GEAR	6'
15	MAINTENANCE BUILDING	6'
16	LFG INLET SCRUBBER	-19'

Source: Origins Engineering Co., Waste Management, Toro Energy, and AECOM (2024)

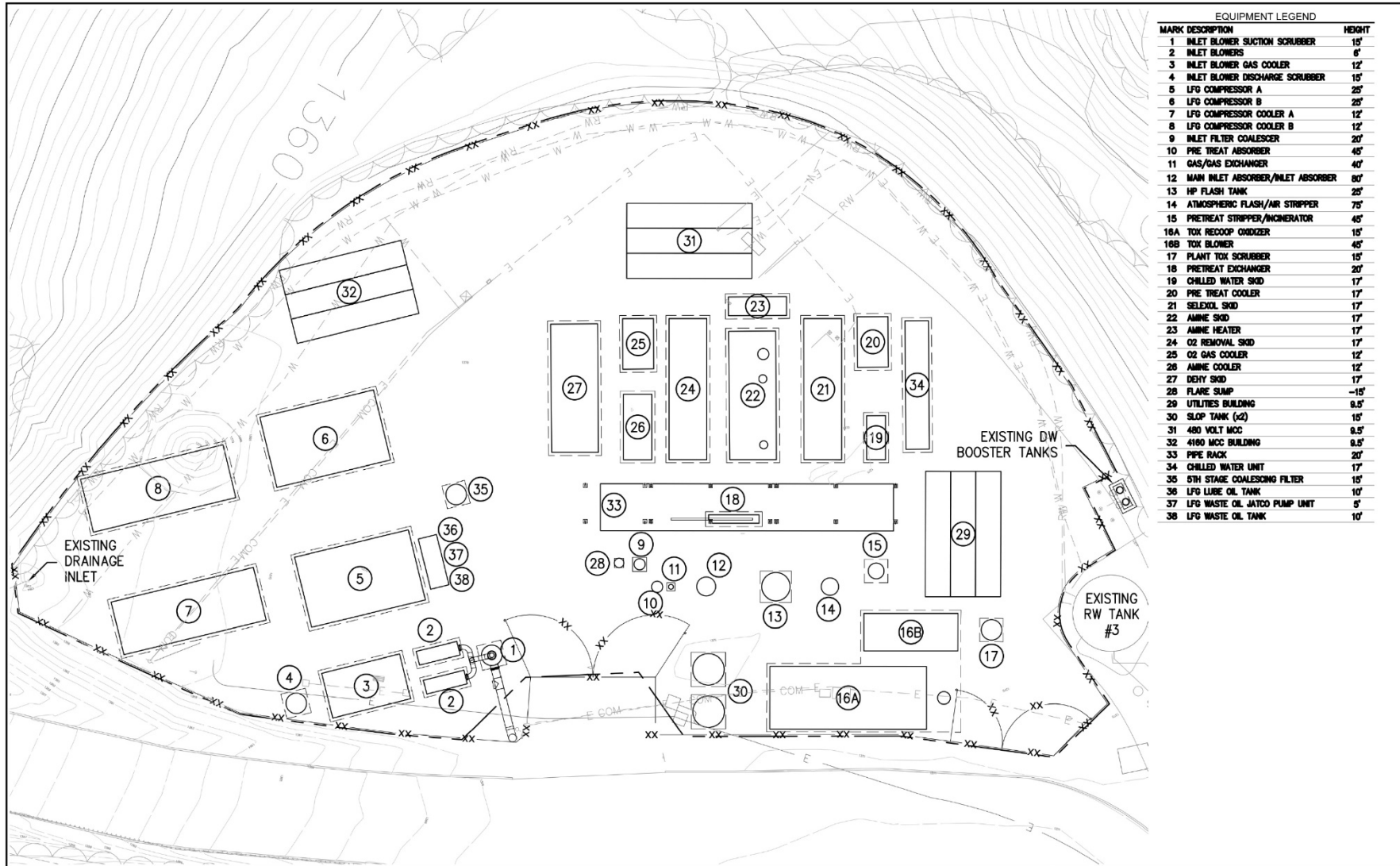


Figure 4
South RNG Site

RNG Facility Project
at El Sobrante Landfill

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Source: Origins Engineering Co., Waste Management, Toro Energy, and AECOM (2024)

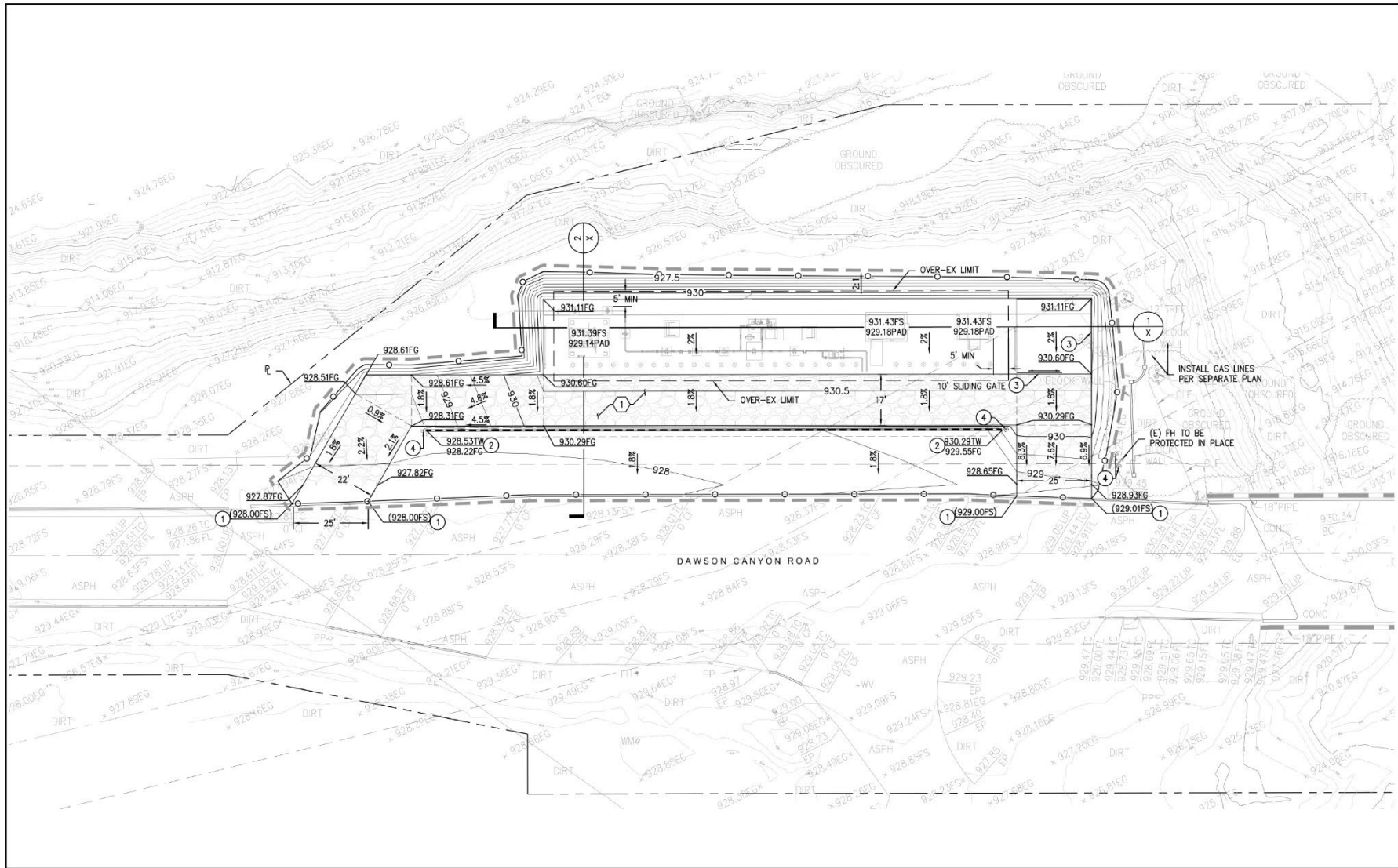


Figure 5
North RNG Site

RNG Facility Project
at El Sobrante Landfill



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Source: Origins Engineering Co., Waste Management, Toro Energy, and AECOM (2024)

LEGEND	
	RIDGE LINE / GRADE BREAK
	OVER-EX LIMIT
	GRADING DAYLIGHT LIMIT
	LIMIT OF WORK

CONSTRUCTION NOTES	
①	JOIN EXISTING CURB AND MATCH GRADE.
②	CONSTRUCT MASONRY RETAINING WALL PER SPWPC STANDARD PLAN 618-3 TYPE A.
③	CONSTRUCT 6" CHAIN LINK FENCE AND GATES PER SPWPC STANDARD PLAN 500-4. DRIVE GATE OPENING WIDTHS PER PLAN. (POR CHAIN LINK PER SEPARATE SDC PLANS)
④	INSTALL CONCRETE BOLLARD PER SEPARATE STRUCTURAL PLANS

PAVING LEGEND	
	UNPAVED ROAD
	PLACE 1 1/2" MINIMUM 1/2" INCH MINUS, CLASS 2 AGGREGATE BASE PER CALTRANS STANDARD SPECIFICATIONS, COMPACTED TO AT LEAST 95% RELATIVE COMPACTION UNDERLAY BY A GEOTEXTILE LAYER AS DESCRIBED IN THE GEOTECHNICAL REPORT.

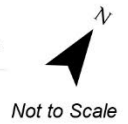


Figure 6
Gas POR Site

RNG Facility Project
at El Sobrante Landfill

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2.6 Construction and Operation Details

Construction

Construction of the proposed project is anticipated to begin in November 2024 and take approximately 18 months to complete (with completion anticipated in March 2026). A crew of approximately 6 to 12 construction workers (daily) would be in the project area during construction. Temporary construction staging areas adjacent to Dawson Canyon Road (approximately 0.6 acre) about 500 feet northeast of the Dawson Canyon Road Bridge over Temescal Canyon Wash, at the South RNG Site (approximately 0.08 acre), and at the North RNG Site (approximately 0.07 acre) would be used for equipment staging and laydown; all three sites would have materials (e.g., demolition and soil) stockpiled on short-term bases. Any excess material requiring disposal would utilize El Sobrante Landfill. Temporary lane closures along the landfill access road/Dawson Canyon Road would occur; however, access to El Sobrante Landfill for normal landfill operations would be maintained throughout the construction period with the use of construction flaggers (e.g., during trenching within roadways, etc.).

Construction activities will include: grading, trenching, directional drilling, import of construction materials (asphalt concrete, aggregate base, decomposed granite, and fill material), soil compaction, equipment installations, building construction, etc.

Major equipment to be used during construction includes, but is not limited to: backhoe, boom truck, concrete pump rig, crane, dozer, excavator, skid loader, vibratory compactor/roller, generator, loader, motor grader, paving machine, roller, sheeps foot, dump truck, flatbed truck, oil/lube truck, pickup truck, water truck, 18-wheel low boy, fuel truck, horizontal directional drill, Redi-Mix truck, etc.

The total construction-related disturbance footprint for the proposed project, both permanent and temporary, would be approximately 5.5 acres.

Operation

The proposed project has been sized to process up to 15,000 standard cubic feet per minute (SCFM) of LFG, which would translate to a maximum RNG output of 8,600 million British thermal units (MMBTU) per day. Operation of the RNG Facility would require the use of fuel gas for heating certain refining/treatment equipment at the North RNG Site. Waste gas from the treatment/refining process would be directed to the recuperative oxidizer for further treatment and release (with less overall methane [emissions] in it than flared LFG). The proposed project does not increase the production or volume of LFG at El Sobrante Landfill but would reduce the overall amount of LFG that is flared.

Toro expects to hire seven full-time employees and up to three part-time employees for operation of the RNG Facility. Regular deliveries of materials (oil, chemicals, spare parts [e.g., filters]) are expected to require one truck trip per week. Infrequent maintenance truck trips (limited to emergency instrument repairs/swap outs, inspections, and other maintenance needs [e.g., oil changes]) would require up to seven vehicle trips spanning up to 10 calendar days out of a year.

Toro and WM are separate corporate entities; therefore, RNG Facility and ESL are owned and operated independently. Each source will maintain separate permits and reporting. As a safety precaution, the RNG plant will be equipped with both a manual shut-off system as well as an automatic shut-off system that functions based on detected pressure drops. Additionally, all accessible pipe flanges would be inspected on a monthly basis for any possible leaks.

3.0 Initial Study/Modified Environmental Checklist

This Initial Study/Modified Environmental Checklist has been prepared pursuant to CEQA (Pub. Resources Code, § 21000 et seq.) for the proposed project. (See Pub. Resources Code, § 21166; State CEQA Guidelines, §§ 15162, 15164.) The El Sobrante Landfill is owned and operated by USA Waste of California, Inc., a subsidiary of WM. Toro, as a separate entity, would own and operate the RNG Facility independently from WM and the El Sobrante Landfill. The RCDWR, acting on behalf of the County of Riverside (County), is the lead agency for the proposed project pursuant to CEQA.

Pursuant to PRC Section 21166, and State CEQA Guidelines Sections 15162 and 15164, subdivision (b), the attached Initial Study/Modified Environmental Checklist and supporting documents have been prepared to support the determination by RCDWR that the 1998 EIR, the 2009 SEIR, and this Addendum for the proposed project is sufficient for purposes of approval of the proposed project, and that no additional subsequent environmental review is required under CEQA. As previously stated, the 1998 EIR analyzed the impacts related to landfill site expansion; overall waste disposal capacity expansion; acceptable daily tonnage increase; and update to the permit waste disposal operations hours. The 1998 EIR found all impacts would be reduced to below a level of significance with implementation of mitigation measures identified in the 1998 EIR. The 2009 SEIR analyzed a revision to the El Sobrante SWFP to accept waste material over a continuous 24-hour period and the change from a maximum daily tonnage limit of 10,000 tpd to a maximum weekly tonnage limit of 70,000 tpw not to exceed 16,054 tpd. The 2009 SEIR analyzed potential environmental impacts associated with aesthetics, air quality, noise, public health and safety, and transportation and circulation, and determined that the revision to the SWFP would not result in any new environmental impacts that were not previously accounted for, and mitigated by, the 1998 EIR.

The attached Initial Study/Modified Environmental Checklist uses the standard environmental checklist provided in Appendix G of the CEQA Guidelines but provides answer columns for evaluation consistent with the considerations listed under CEQA Guidelines sections 15162, subdivision (a), and 15164. The purpose of the Initial Study/Modified Environmental Checklist is to evaluate the environmental factors in terms of any “changed condition” (e.g., changed circumstances, proposed project changes, or new information of substantial importance) which will require major revisions to the adopted 1998 EIR and 2009 SEIR due to the involvement of new significant effects or a substantial increase in the severity of a previously identified significant effect. (CEQA Guidelines, § 15162). A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental factor, but rather that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures or project revisions in the 1998 EIR or 2009 SEIR.

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
1. Aesthetics. Except as provided in Public Resources Code Section 21099, would the project:					
a. Have a substantial adverse effect on a scenic vista?	1998 EIR, § 4.8; 2009 SEIR, § 4.1	No	No	No	No
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	1998 EIR, § 4.8; 2009 SEIR, § 4.1	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
c. In nonurbanized areas, substantially degrade the existing visual character or quality of the public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	1998 EIR, § 4.8; 2009 SEIR, § 4.1	No	No	No	No
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	1998 EIR, § 4.8; 2009 SEIR, § 4.1	No	No	No	No

Environmental Setting/Discussion

The proposed project consists of installing and operating an RNG Facility at the existing El Sobrante Landfill (landfill) within three previously disturbed areas, which would involve the following elements: a South RNG Site; a North RNG Site; a Gas POR Site; underground piping within pipe trenches connecting the three sites for the purpose of conveying the LFG, processed gas, and other necessary lines for the RNG

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>process; and an underground pipeline interconnection between the Gas POR Site and SoCal Gas’ existing main pipeline located in Temescal Canyon Road. The South RNG Site will be located adjacent to the landfill’s existing flare station. This location is part of a larger graded area associated with the existing landfill entry and scale. The North RNG Site will be located on an existing graded landfill pad which contains the landfill’s former maintenance shop, a trailer, a concrete pad, a 40,000-gallon reclaimed water storage tank, and potable water booster tanks. The Gas POR Site will be located within the existing shoulder turnout approximately 600 feet northeast of the Temescal Canyon Road and Dawson Canyon Road intersection. The proposed underground pipe trenches will be constructed along the existing paved, two-lane access road (Dawson Canyon Road) between the South RNG Site and North RNG Site, and between the South RNG Site and the north side of Temescal Canyon Wash. The proposed underground piping will be connected to a proposed HDD segment under Temescal Canyon Wash which will connect to the Gas POR Site. The Gas POR Site will then be connected to a new SoCal Gas pipeline segment.</p> <p>The landfill encompasses approximately 1,322 acres in unincorporated western Riverside County and is located east of Interstate (I)-15, in the upper elevations of the foothills east of Temescal Valley between Olsen Canyon and Dawson Canyon. The site is characterized by gently to steeply sloping hills, as well as knolls, ridges, and flat mesas.</p> <p>The landfill is currently permitted for disposal of municipal solid waste on approximately 468 acres of the 1,322-acre site. The overall landfill area includes an administration building, maintenance facility, a flare station, entrance area, and scales. The facilities that are generally clustered at the entrance to the El Sobrante Landfill include: a security gate, a vehicle queuing area, four (4) scales, three single-story pre-fabricated buildings, a rest area, and a paved parking area. A landfill gas-to-energy facility/flare station (consisting of three generators and supporting equipment) is located adjacent to the landfill entrance. A series of dirt roads traverse the landfill site providing access to the various activity areas. The remaining northern, eastern, and southern portions of the landfill are managed as natural open space conservation lands (i.e., Declaration of Conservation and Conservation Easement lands within the El Sobrante Landfill Multiple Species Habitat Conservation Plan [ESL MSHCP]) and are mostly characterized by gently to steeply sloping hillsides and native vegetation.</p> <p>Dawson Canyon Road, an approximate 20-foot-wide, paved road with shoulders, provides access to the landfill entrance area. It includes an approximate 180-foot-long bridge spanning Temescal Canyon Wash approximately 950 feet northeast of its intersection with Temescal Canyon Road. Dawson Canyon Road is approximately 1.25 miles long between Temescal Canyon Road and the landfill entrance.</p>					

- a. Have a substantial adverse effect on a scenic vista?
- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- c. In nonurbanized areas, substantially degrade the existing visual character or quality of the public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The 1998 EIR prepared for the El Sobrante Landfill included an in-depth analysis of potential adverse impacts to the overall visual quality and character of the El Sobrante area as well as potential impacts to scenic vistas and County- and State-Eligible Scenic Highways. As a result of the previous analysis, several significant adverse impacts to visual quality were identified (e.g., topographic alterations/creation of a new ridgeline, nighttime lighting/illumination, cumulative modification of the rural character of the area, etc.). Mitigation measures were included in the 1998 EIR to reduce potential visual quality impacts to below a level of significance (e.g., visual screening via phased development and vegetative restoration, color selection for facilities that blends with the surrounding area, shielding and downward directing of lighting, etc.), and the required mitigation measures have been incorporated into the operational characteristics of the El Sobrante Landfill. The 2009 SEIR analyzed minor modifications to the operational characteristics of the landfill associated with hours of operation and waste acceptance rates and found no new significant impacts to scenic vistas, scenic highways, or visual character or quality of the site beyond those identified in the 1998 EIR.

As discussed above, implementation of the proposed project includes installing and operating an RNG Facility within three previously disturbed areas at the existing landfill. The nearest State Eligible Scenic Highway is I-15 from the City of Corona south to the San Diego County line, which is located approximately 0.2 mile west of the Gas POR Site at its closest point to the proposed project. The Gas POR Site is a disturbed dirt pad adjacent to Danson Canyon Road, with limited vegetation and some non-native eucalyptus trees. There are no identified scenic resources on the Gas POR Site, including rock outcroppings or historic buildings. Three non-native eucalyptus trees would be removed for installation of the POR facility, but they are not considered scenic resources. The South and North RNG Sites are both existing graded pads within the landfill, located approximately 1 and 1.5 miles northeast of the Gas POR Site, respectively. There are no identified scenic resources on the South or North RNG Sites.

The project components that could be visible to the public from certain vantage points would be the above-ground structures associated with the North RNG Site, South RNG Site, and Gas POR Site. To assess visibility of the proposed project six public viewpoints that have the potential to offer views of the proposed above-ground structures were analyzed. These viewpoints have varying degrees of visibility of the three sites considering distance, elevation, and topography (refer to Appendix A of this Addendum for the viewpoints and visual simulations). The six viewpoints (see Figures 1, 8, and 11 in Appendix A for the index maps) are from [1] Leroy Road, [2] Pulsar Court, and [3] Stellar Court (all three located approximately 1.4 miles west of the North RNG Site; see Figures 2 through 5 in Appendix A for street views and renderings); [4] Dawon Canyon Road (located nearby the Gas POR Site; see Figures 6 and 7 in Appendix A for street view and renderings); [5] Bedford Motor Way (located approximately 2.6 miles west of the North RNG Site; see Figures 9 and 10 in Appendix A for street view

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<p>and rendering); and [6] Terramor, a master-planned community (located approximately 2 miles south of the South RNG Site and North RNG Site; see Figures 12 through 14 in Appendix A for renderings).</p> <p>Due to existing topography of the foothills surrounding the landfill, as well as the elevations of the landfill itself, views of the North RNG Site are limited to those from the west (where Olsen Canyon offers line of site). As shown in the street views from Leroy Road and Pulsar and Stellar Courts (the closest locations from the west; Figures 2 through 4), the North RNG Site would be shielded by existing landscaping and buildings and not visible. To depict a representation of views that could be possible from other, private views in this area, renderings with the absence of the obstructing landscaping and buildings are provided in Figure 5. These renderings show that the tallest equipment at the North RNG Site could be visible but, due to distance (approximately 1.4 miles) and the color of the equipment that would blend with its surroundings, the proposed changes would be difficult to discern. Further west (approximately 2.6 miles from the North RNG Site) and from an elevated position at Bedford Motor Way (Figures 9 and 10), a similar but more distant view would occur. Due to distance and color of equipment the proposed changes from this viewpoint would similarly be difficult to discern.</p> <p>Existing vegetation, utilities, fencing, and buildings along Temescal Canyon Road obstruct views of the Gas POR Site, which would only be visible from Dawson Canyon Road itself, and briefly to motorists on Temescal Canyon Road at its intersection with Dawson Canyon Road. Figure 6 shows the street view of the Gas POR Site from the adjacent Dawson Canyon Road, which has been disturbed and used as a graded turnout area and temporary food truck parking. The renderings shown in Figures 6 and 7 depict a representation of the POR facility that includes painted, decorative fencing (6 feet in height), which would screen the POR components within. As shown, the overall POR facility would be on a raised fill pad so that it is one foot above the base flood elevation. An approximately 3-foot-high masonry retaining wall supports the fill and is visible between Dawson Canyon Road and the internal POR access road/driveway with gates. Installation of the POR facility would require removal of three non-native eucalyptus trees, but vegetation behind the facility (associated with Coldwater Canyon Creek [also referred to as Coldwater Canyon Wash]) and the nearby Temescal Canyon Wash would remain. Dawson Canyon Road in this area is a paved roadway lined with trees, vegetation, utility poles, exposed pipelines with associated metering appurtenances, existing masonry brick walls with gates/fencing (at intersection with Temescal Canyon Road), roadway and landfill signage, etc. The proposed POR facility structure materials and colors would be consistent with the existing visual context of Dawson Canyon Road and vicinity in this location.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>The graded pad of the South RNG Site is situated within a depression relative to the immediately surrounding natural and landfill-related topographic features (i.e., natural ridgelines and constructed fill slopes) that serve to obstruct most views of the South RNG Site. Due to existing topography of the foothills surrounding the landfill, as well as the elevations of the landfill itself, views of the South RNG Site would be limited to those from the south but at distant, elevated positions. The Terramor development, approximately 2 miles south of the landfill, is at a sufficiently elevated position relative to the landfill for potential views of the South RNG Site. As shown in Figure 11, of the three views (View 1, View 2 and View 3) from the Terramor development only one (View 1) is able to offer a view of proposed equipment at the South RNG Site. The rendering for Site 1 (Figure 12) shows the top of the tallest piece of equipment at the South RNG Site is visible but, due to the 2-mile distance and the color of the equipment that blends with its surroundings, the proposed changes would be difficult to discern from this location. Existing hillsides, ridgelines, and landfill elevations shield the remainder of the South RNG Site, as well as the entirety of the North RNG Site from this view. As shown in the renderings for Views 2 and 3 from Terramor (Figures 13 and 14) no parts of the South or North RNG Sites are visible due to topographic obstructions.</p> <p>The most distant considered vantage point was Trilogy Parkway, located approximately 3.1 miles southwest of the North RNG Site. However, it was determined that none of the proposed, above-ground structures would be visible from this location. The existing elevations of the landfill face would fully obstruct views of the proposed project and, therefore, this vantage point was not included in Appendix A.</p> <p>Overall, the proposed project-related changes would be visible from a limited number of locations due to natural and landfill-related topographic features that obstruct most views. For the North and South RNG Facility Sites the distance to, and color of, proposed equipment would be sufficient such that they are not substantially noticeable from the limited locations. For the Gas POR Site, which would only be visible from a portion of Dawson Canyon Road, and briefly to motorists on Temescal Canyon Road at its intersection with Dawson Canyon Road, the proposed changes would be consistent with the existing visual context of Dawson Canyon Road and vicinity in this location. Further, these changes within the context of previous analyses would not significantly alter the prior aesthetics-related impact conclusions for the lateral and vertical landfill expansion. The mitigation measures identified in the 1998 EIR to reduce potential aesthetics impacts (see Mitigation Measure A-3, below, for example) would continue to be enforced upon implementation of the proposed project. Accordingly, no new significant adverse impacts on a scenic vista or within a scenic highway, or degradation of the existing visual character or quality of the site would occur.</p>					

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Onsite landfill operations with respect to light and glare were analyzed as part of the 1998 EIR and mitigation measures were identified to reduce potential impacts associated with onsite artificial lighting. The 2009 SEIR performed detailed light and glare analyses for eight (8) residential areas in the landfill vicinity due to the proposal to extend the hours for waste delivery, which had the potential to introduce increased (offsite) artificial lighting into the surrounding areas during non-daylight hours. The analysis within the 2009 SEIR found that potential lighting impacts would not be significant.

The proposed project does not include any changes to landfill operations. Any lighting associated with the proposed project, such as site lighting for nighttime operation and maintenance, would be subject to the mitigation measures identified in the 1998 EIR to reduce potential impacts associated with onsite artificial lighting (see Mitigation Measures A-5 and A-6, below), which would continue to be enforced upon implementation of the proposed project. Accordingly, no new significant adverse impact related to light and glare would occur.

Therefore, no new significant adverse impacts to aesthetics associated with the proposed project are anticipated.

Mitigation Measures, Conditions of Approval or Regulatory Requirements

Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:

- A-1 To assure visual screening of landfill operations and facilities, a phased closure and restoration plan shall be implemented. The closure and restoration plan shall utilize Riversidian sage scrub consistent with native vegetation in nearby undisturbed areas of the Gavilan Hills to minimize visual impacts to surrounding views.
- A-2 Development shall be phased such that only approximately 20 acres are disturbed at any one time. Riversidian sage scrub restoration activities shall be similarly phased.
- A-3 Landfill-associated facilities and structure exteriors (including rooftops) and signage shall be of a color consistent with the surrounding area.
- A-4 A plan that assures the removal or approved use of landfill-associated facilities, structures, and signage shall be approved by the CALRECYCLE, as part of the Post-closure Plan.

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
A-5	Outdoor lighting associated with the access road, administration building, and scales shall be directed toward the ground and shall be shielded. Portable lighting used for landfill operations (i.e., working face of the landfill) shall be shielded and directed toward the working area.				
A-6	Wherever feasible, temporary earthen or landscape berms, or other structures or measures, shall be utilized to provide visual screening of operations at the working face and to reduce potential glare impacts on surrounding residences from nighttime activities at the working face of El Sobrante. Any measures implemented for this purpose shall be subject to annual review by the Citizen Oversight Committee.				
A-7	A plan that assures the removal of litter associated with the proposed project shall be approved by the CALRECYCLE prior to the issuance of a SWFP. USA Waste or its successor-in-interest shall be responsible for the control and cleanup of litter and debris from the landfill and/or waste-hauling vehicles along the landfill access road to its intersection with Temescal Canyon Road, and along Temescal Canyon Road from the intersection of Interstate 15 (I-15) to the intersection with Weirick Road. At a minimum, USA Waste or its successor-in-interest shall inspect and remove litter and debris from these roadways on a weekly basis and within 48 hours upon receipt of notice of complaint.				

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<p>2. Agriculture and Forestry Resources. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>					
<p>a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>	<p>1998 EIR, Appendix A, § 47. Agriculture, p. A.1-38</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>
<p>b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<p>1998 EIR, Appendix A, § 47. Agriculture, p. A.1-38</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>

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c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	Not Previously Assessed	No	No	No	No
d. Result in the loss of forest land or conversion of forest land to non-forest use?	Not Previously Assessed	No	No	No	No
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	1998 EIR, Appendix A, § 47. Agriculture, p. A.1-38	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p><u>Environmental Setting/ Discussion</u></p> <p>a. <u>Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</u></p> <p>b. <u>Conflict with existing zoning for agricultural use, or a Williamson Act contract?</u></p> <p>The 1998 EIR found no significant adverse impacts to agricultural resources. It concluded that there was no agricultural crops or prime farmland located within the landfill, that no agricultural preserves were located within or adjacent to it, and that although the lateral expansion would result in the development of land zoned for agriculture, no significant impacts would occur because the expansion area was vacant and not used for agricultural activities.</p> <p>Since the proposed project will not physically expand the landfill footprint and the prior environmental documentation that analyzed the proposed project footprint determined that there was no impact to agricultural resources/operations, the prior environmental documentation adequately addresses the proposed project’s impacts to agricultural resources/operations and no additional analysis of this issue is warranted.</p> <p>c. <u>Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</u></p> <p>d. <u>Result in the loss of forest land or conversion of forest land to non-forest use?</u></p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>The 1998 EIR and 2009 SEIR did not contain an analysis of forestland resources. The proposed project is not located on forest land (as defined by Public Resources Code Section 12220[g]) or timberland (as defined in Public Resources Code Section 4526), nor would it be on land zoned as timberland (as defined by Government Code Section 51104[g]). The proposed project would therefore not conflict with existing zoning for, or cause rezoning of, forest land, or timberland zoned Timberland Production or result in the conversion of forest land to non-forest use. No impacts would occur and no mitigation measures would be required.</p> <p>e. <u>Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?</u></p> <p>Refer to responses (a) through (d), above. No significant adverse impacts to agriculture or forestry resources associated with the proposed project are anticipated.</p> <p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p> <p>There are no mitigation measures, conditions of approval, or regulatory requirements related to this environmental factor.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
3. Air Quality. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?	1998 EIR § 4.6; 2009 SEIR, § 4.2, Appendix B	No	No	No	No
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	1998 EIR § 4.6; 2009 SEIR, § 4.2, Appendix B	No	No	No	No
c. Expose sensitive receptors to substantial pollutant concentrations?	1998 EIR § 4.6; 2009 SEIR, § 4.2, Appendix B	No	No	No	No
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	1998 EIR § 4.6; 2009 SEIR, § 4.2, Appendix B	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p><u>Environmental Setting/ Discussion</u></p> <p>The discussion below is based on Air Quality and Greenhouse Gas Emissions Report (TAHA 2024a) (Appendix B of this Addendum) prepared for the proposed project.</p> <p>The project site is located in the portion of Riverside County within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD jurisdiction is divided geographically into 38 source receptors areas (SARs), 28 of which contain at least one air quality monitoring station. The proposed project site is located within SRA 22 – Corona/Norco Area (for North and South RNG Sites) and SRA 25 – Lake Elsinore (Gas POR Site). The monitoring site that provides data most representative of air quality in the vicinity of the proposed project is the Lake Elsinore site located at 506 West Flint Street which is located approximately 11.6 miles southeast of the proposed project.</p> <p>a. <u>Conflict with or obstruct implementation of the applicable air quality plan?</u></p> <p><u>Construction</u></p> <p>Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips by construction workers and haul and delivery trucks traveling to and from the project site. Fugitive dust emissions would primarily result from grading, trenching, and truck loading activities. Nitrogen oxides (NO_x) emissions would be generated in off-road equipment exhaust and on-road vehicle exhaust. The assessment of construction air quality impacts considered all of these emissions sources.</p> <p>Construction of the RNG Facility, Gas POR Site connection work, and installation of the underground pipeline would collectively occur over an 18-month period between the fourth quarter of 2024 and the first quarter of 2026. Emissions generated during construction of the proposed project would be temporary in nature and would cease entirely once the RNG Facility and utility connections are complete. Table 3-1 presents a summary of the maximum daily emissions that could occur during concurrent construction of the various proposed project components on the three designated sites.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
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Table 3-1: Proposed Project Estimated Construction Emissions

Construction Activity	Maximum Daily Emissions (lbs./day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobilization (Component Delivery)	0.7	18.5	6.5	0.4	3.9	1.3
POR Metering Site Preparation	9.3	6.8	21.0	<0.1	1.1	0.5
POR Metering Facility SoCalGas Work	0.4	3.6	5.5	<0.1	0.8	0.3
South Plant Site Grading & Construction	0.8	6.6	10.5	<0.1	0.9	0.4
North Plant Site Grading & Construction	1.3	9.7	15.1	<0.1	1.2	0.5
Primary Electrical Installation	1.2	9.2	12.8	<0.1	1.1	0.5
Office & Maintenance Building Construction	0.5	4.1	5.3	<0.1	0.4	0.2
Pipe Installation & Roadway Restoration	1.4	11.1	14.1	<0.1	1.1	0.6
Plant Equipment Assembly & Installation	0.7	5.4	7.5	<0.1	0.6	0.3
Total Daily Overlapping Construction	16.3	75.1	98.2	0.7	11.0	4.5
REGIONAL ANALYSIS						
Maximum Regional Daily Emissions	16.3	75.1	98.2	0.7	11.0	4.5
Regional Significance Threshold	75	100	550	150	150	55
Exceed Daily Threshold?	No	No	No	No	No	No
Note: Emissions modeling files can be found in Appendix B of this Addendum. Source: TAHA, 2024						

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>As stated above and consistent with the regulatory compliance measures identified in previous environmental documentation, the unmitigated emissions account for the provisions of SCAQMD Rule 403, which requires best management practice in fugitive dust control. Maximum daily emissions of all air pollutants would remain below all applicable regional SCAQMD thresholds during construction of the proposed project. Based on SCAQMD guidance, construction of the proposed project would not have the potential to result in an increase in the frequency or severity of existing air quality violations, nor would it create new air quality violations. Construction of the proposed project would not interfere with implementation of the Air Quality Management Plan (AQMP) or the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Furthermore, construction crews would be sourced from the existing regional workforce and would not induce growth in population within the SCAB. The temporary emissions associated with delivery of proposed project components would not contribute to a potentially significant air quality impact. However, the 1998 EIR/2009 SEIR determined that landfill expansion-related emissions were potentially significant and mitigation measures AQ-1 through AQ-14 were identified to reduce these impacts to a level below significant. As such, with the addition of the proposed project to the existing landfill operation, the 1998 EIR/2009 SEIR mitigation measures would remain in effect. Therefore, this impact would be less than significant for construction of the proposed project, and no additional mitigation would be required.</p> <p><u>Operations</u></p> <p>From an air quality perspective, the emissions sources involved in proposed project operations would be similar to existing conditions with the exception of the RNG Facility reducing LFG flared to the atmosphere. Implementation of the proposed project would not introduce any new growth in population, housing, or employment at the regional scale. Project operations would not introduce any new substantial permanent source of air pollutant emissions to the project area; seven full-time employee and up to three part-time employee commuting trips would result in negligible changes to regional air quality. The proposed project does not have the potential to conflict with or obstruct implementation of the AQMP as it pertains to attaining the ambient air quality standards.</p> <p>The operational emissions analysis for implementation of the proposed project focused on the daily change in emissions resulting from the diversion of LFG from being flared to the RNG Facility, as well as the employee vehicle trips and several additional daily private waste delivery trips. Table 3-2 provides a summary of the daily ozone-precursor and criteria pollutant emissions that would be generated by future operation of the proposed project, including the RNG Facility. As demonstrated by the results of the analysis, RNG Facility operation would result in a net decrease in volatile organic compounds (VOCs) emissions due to the reduction in LFG flaring, and relatively minor increases</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
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in NO_x, carbon monoxide (CO), and particulate matter (PM) emissions associated with vehicle trips. Therefore, this impact would be less than significant regarding the potential exacerbation of air quality violations and delaying attainment of the air quality standards.

Table 3-2: Proposed Project Estimated Operational Emissions

Sources and Analytical Parameters	Daily Emissions (lbs./day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
VEHICLE TRIP EMISSIONS						
RNG Facility Employee Trips	0.3	0.5	4.3	<0.1	1.0	0.3
Maintenance Vehicle Trips	0.1	0.2	0.7	<0.1	<0.1	<0.1
Private Delivery Trips	0.1	0.2	1.4	<0.1	0.4	0.1
<i>Vehicle Trips Subtotal</i>	<i>0.5</i>	<i>0.9</i>	<i>6.4</i>	<i><0.1</i>	<i>1.5</i>	<i>0.4</i>
RNG FACILITY EMISSIONS						
Existing Flared Emissions	558.1	-	-	-	-	-
RNG Facility Emissions	396.2	-	-	-	-	-
<i>Net Change from Existing Conditions</i>	<i>(161.8)</i>	-	-	-	-	-
REGIONAL ANALYSIS						
Project Operational Emissions	(161.3)	0.9	6.4	<0.1	1.5	0.4
SCAQMD Significance Threshold	55	55	550	150	150	55
Exceed Regional Threshold?	No	No	No	No	No	No
<p>Note: Emissions modeling files can be found in Appendix B of this Addendum; parenthetical notation (#) indicates negative value. Source: TAHA, 2024</p>						

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>The second element of consistency with the air quality plan is determined by evaluating whether implementation of the proposed project would exceed the assumptions in the AQMP related to regional growth, thereby rendering the regional emissions inventory inaccurate. Implementation of the proposed project would not introduce new growth in regional population or housing, and would require seven full-time employees and up to three part-time employees to manage the RNG Facility. Therefore, proposed project operations would have a negligible effect related to growth projections built into the AQMP emissions inventory, as it is assumed that the additional employees would be sourced from the existing regional workforce (i.e., would not relocate for employment at the landfill). The proposed project would not have any potential to result in growth that would exceed the projections incorporated into the AQMP or the applicable RTP/SCS that could render the emissions inventory or air quality conformity analysis invalid. Future operation of the proposed project would not interfere with air pollution control measures listed in the AQMP. The proposed project would accommodate more efficient operations at the landfill and would not have the potential to exacerbate existing air quality violation conditions. Therefore, this impact would be less than significant.</p> <p>b. <u>Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?</u></p> <p>The SCAQMD is currently designated nonattainment for O₃ and PM₁₀ under state standards and nonattainment for O₃ under the federal standards. Therefore, a project may result in a cumulatively considerable air quality impact under this criterion if daily emissions of ozone precursors (VOC and NO_x) or particulate matter (PM₁₀) exceed applicable air quality thresholds of significance established by the SCAQMD. The SCAQMD designed the significance thresholds to prevent projects from exceeding the ambient air quality standards and potentially resulting in air quality violations. The SCAQMD suggests that if any quantitative air quality significance threshold is exceeded by an individual project during construction activities or operation, that project is considered significant and would be required to implement effective and feasible mitigation measures to reduce air quality impacts. Conversely, the SCAQMD propagates the guidance that if an individual project would not exceed the significance thresholds, then it is generally not considered to be significant. As discussed above and demonstrated in the analysis presented in Table 3-1 and Table 3-2, implementation of the proposed project would not generate magnitudes of emissions in excess of any applicable SCAQMD regional mass daily threshold during construction or operations. Therefore, this impact would be less than significant.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>c. <u>Expose sensitive receptors to substantial pollutant concentrations?</u></p> <p><u>Construction</u> The nearest sensitive receptors to the project site are residences located approximately 1,740 feet to the west of the Gas POR Site. The SCAQMD has established 1,640 feet (500 meters) as the protective buffer distance for assessing localized air quality impacts for CEQA projects. There are no sensitive receptors within close enough proximity to the project site that substantial pollutant concentrations would be capable of reaching through atmospheric dispersion by wind patterns. Pollutant concentrations resulting from heavy-duty equipment use and vehicle trips would dissipate prior to encountering any sensitive receptors. However, a localized analysis of proposed project construction emissions was included for informational purposes and to replicate the scope of prior air quality analyses within environmental documentation prepared for the landfill. Table 3-3 presents a summary of maximum daily emissions from sources located on the project site, which include all off-road equipment emissions as well as vehicle trips that would occur within the property boundary. As shown below, maximum daily emissions from sources located within the property boundary and the Gas POR Site would remain well below the applicable SCAQMD Localized Significance Threshold (LST) screening values for both SRA 22 and SRA 25. Therefore, this impact would be less than significant.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
Table 3-3: Proposed Project Estimated On-Site Construction Emissions					
Construction Activity		Maximum Daily Emissions (lbs./day)			
		NO _x	CO	PM ₁₀	PM _{2.5}
POR Metering Site Preparation		6.8	21.0	1.1	0.5
POR Metering Facility SoCalGas Work		3.6	5.5	0.8	0.3
South Plant Site Grading & Construction		6.6	10.5	0.9	0.4
North Plant Site Grading & Construction		9.7	15.1	1.2	0.5
Primary Electrical Installation		9.2	12.8	1.1	0.5
Office & Maintenance Building Construction		4.1	5.3	0.4	0.2
Pipe Installation & Roadway Restoration		11.1	14.1	1.1	0.6
Plant Equipment Assembly & Installation		5.4	7.5	0.6	0.3
Total Daily On-Site Emissions		56.6	91.7	7.1	3.2
LOCALIZED ANALYSIS					
Maximum Regional Daily Emissions		56.6	91.7	7.1	3.2
SRA 22 Localized Significance Threshold		652	17,637	198	92
SRA 25 Localized Significance Threshold		896	23,866	178	86
Exceed Daily Localized Thresholds?		No	No	No	No
<p>Note: Emissions modeling files can be found in Appendix B of this Addendum. Source: TAHA, 2024</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p><u>Operations</u> As mentioned in the discussion regarding construction, there are no sensitive receptors located within 1,600 feet of the project site. Implementation of the proposed project would not introduce any new stationary sources of emissions to the project site, and the operation of the RNG Facility would result in a net decrease in O₃-precursor (VOC) emissions, as shown in Table 3-2. Proposed project operations would not materially alter the nature of activities conducted on the landfill, and maintenance trips would occur only several times per year. As a safety precaution, the RNG plant will be equipped with both a manual shut-off system as well as an automatic shut-off system that functions based on detected pressure drops. Additionally, all accessible pipe flanges would be inspected on a monthly basis for any possible leaks. Therefore, there is no potential for future operation of the proposed project to expose sensitive receptors to substantial pollutant concentrations, and this impact would be less than significant.</p> <p>d. <u>Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</u></p> <p><u>Construction</u> Potential sources that may produce objectionable odors during construction activities include equipment exhaust and off-gassing of disturbed waste. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. Construction of the proposed project would employ best management practices to prevent the occurrence of a nuisance odor in accordance with SCAQMD Rule 402 Nuisance, and the odors would be typical of most construction sites and temporary in nature. There are no sensitive land uses in close proximity to the project site that would be especially sensitive to odors emanating from these sources. Therefore, this impact would be less than significant.</p> <p><u>Operations</u> Solid waste and landfill gas are potential sources of odor. Odor associated with landfill operations is controlled by application of daily cover material. This limits most odors to the proximity of the working face during operations. Cover methods and the remoteness of the site keep odor from becoming a nuisance. Historically, landfill operations have not created significant odor impacts. The landfill is in full compliance with SCAQMD Rule 1150.1 governing control of gaseous emissions from landfills, and with Rule 402 prohibiting creation of a nuisance from odor or dust. The proposed RNG facility would involve a closed system that would not vent any landfill gas directly to the atmosphere, and the magnitude of flared landfill gas volume would be reduced relative to existing operational conditions. Operation of the proposed project would not introduce any new permanent source of air pollutant emissions to the project area beyond intermittent employee, private</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>delivery, and maintenance vehicle trips, which would not alter the magnitude of odorous emissions emanating from the landfill. Therefore, operation of the proposed project does not have the potential to expose sensitive receptors to odors or other emissions that could cause public nuisances, and therefore, this impact would be less than significant.</p>					
<p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p>					
<p>Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:</p>					
<p>AQ-1 The following activities shall occur based on SCAQMD Rule 1150.1 - Control of Gaseous Emissions from Active Landfills:</p> <ul style="list-style-type: none"> • Landfill gas collection and thermal destruction systems shall be provided and operated. • Landfill gas destruction system shall be constructed using best available control technology (BACT). Improved combustion technology (e.g., boiler) shall be installed at the time that the continued use of current technology flares would exceed SCAQMD standards for stationary sources. • A network of landfill gas monitoring probes shall be installed to identify potential areas of subsurface landfill gas migrations. • The project includes a landfill gas barrier layer (i.e., 10- to 20-mil high-density polyethylene [HDPE] or polyvinyl chloride [PVC] sheeting) as part of the intermediate cover and final cover system. This gas barrier layer is not required by Subtitle D and would minimize excess air infiltration and fugitive landfill gas emissions, and would increase landfill gas collection efficiency. • Monitoring of landfill gas concentrations at perimeter probes, gas collection system headers, landfill surface, and in ambient air downwind of the landfill shall be conducted in accordance with applicable regulations. • Annual emissions testing of inlet and exhaust gases from the landfill gas destruction system shall be conducted to evaluate gas destruction efficiency. • The gas collection system shall be adjusted and improved based on quarterly monitoring and annual stack testing results. 					
<p>AQ-2 The following activities shall occur based on SCAQMD Rule 403 - Fugitive Dust:</p> <ul style="list-style-type: none"> • Emission controls necessary to assure that dust emissions are not visible beyond the landfill property boundary shall be implemented. 					

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<ul style="list-style-type: none"> • New cell construction and cell closure activities shall not occur simultaneously. • The Rule 403 Fugitive Dust Emissions Control Plan for the landfill, approved by SCAQMD in May 1993, shall be adhered to. The plan itemized various control strategies for dust emissions from earthmoving, unpaved road travel, storage piles, vehicle track-out, and disturbed surface areas, including watering, chemical stabilizers, revegetation, and operational controls or shutdown for implementation during both normal and high wind conditions. • Rule 403 Fugitive Dust Emissions Control Plan shall be revised on an annual basis. <p>[Note: Dust control measures are currently implemented at El Sobrante Landfill in accordance with this mitigation measure and the landfill’s SCAQMD-approved Rule 403 Large Operation Notification. However, it should be noted that subsequent to approval of the 1998 EIR, Rule 403 requirements changed, and the landfill operator is no longer required to revise the Fugitive Dust Control Plan on an annual basis (www.aqmd.gov). The current Fugitive Dust Control Plan is available for review at the landfill, and is filed in the site records for mitigation compliance purposes.]</p> <p>AQ-3 The following mitigation measures exceed current regulatory requirements and shall be incorporated by design, construction, and operation:</p> <ul style="list-style-type: none"> • PM₁₀ monitoring stations and an onsite meteorological station shall be installed and operated, as agreed in consultation with the SCAQMD. • Where feasible, landfill roads shall be paved. • Portions of paved roads abutting unpaved haul truck traffic areas shall be routinely swept and/or washed. • Onsite vehicles shall be routinely maintained. <p>AQ-4 In the event monitoring indicates that permissible levels of PM₁₀ are being exceeded, some combination of the following dust control measures shall be implemented:</p> <ul style="list-style-type: none"> • Washing of truck wheels. • Routing paved access roads away from directions that result in property boundary impacts. • Curtailing specific activities (e.g., new phase construction) when conditions are unfavorable for fugitive PM₁₀ control. <p>AQ-5 The following activities would occur based on SCAQMD Regulation XIII - New Source Review:</p> <ul style="list-style-type: none"> • Control devices for stationary emission sources shall be provided which satisfy BACT requirements. 					

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<p>• NO_x, ROG, SO_x, and PM₁₀ emissions from stationary sources shall be offset according to SCAQMD requirements for essential public services.</p> <p>AQ-6 The following activity shall occur based on SCAQMD Regulation XIV - Toxics and Other Noncriteria Pollutants:</p> <ul style="list-style-type: none"> • Control devices for stationary emission sources shall be provided which assure that emissions of potentially carcinogenic and/or toxic compounds do not result in unacceptable health risks downwind of the landfill. <p>AQ-7 Onsite vehicles shall be routinely maintained.</p> <p>AQ-8 Heavy construction equipment shall use low sulfur fuel (<0.05 percent by weight) and shall be properly tuned and maintained to reduce emissions.</p> <p>AQ-9 Construction equipment shall be fitted with the most modern emission control devices.</p> <p>AQ-10 The project shall comply with SCAQMD Rule 461 which establishes requirements for vapor control from the transfer of fuel from the fuel truck to vehicles.</p> <p>AQ-11 Prior to construction and construction/operation activities, the following premonitoring measures shall be implemented to avoid or lessen boundary concentrations of NO₂:</p> <ul style="list-style-type: none"> • Normal landfill operations and cell construction/closure activities shall be preplanned to avoid potentially adverse alignments (both horizontally and vertically) during anticipated periods of meteorological conditions which could result in the greatest property boundary concentration. • During periods when both disposal and construction activities are occurring, downwind property line monitoring of NO₂ shall be implemented for wind and stability conditions which could result in the highest boundary concentrations. <p>During construction and construction/operation activities, the following postmonitoring measures shall be implemented to avoid or lessen boundary concentrations of NO₂:</p> <ul style="list-style-type: none"> • If monitoring determines that the 1-hour NO₂ standard (i.e., 470 µg/m³) is being approached (i.e., within 95percent of the standard or approximately 450 µg /m³), construction or cell closure activities shall be curtailed until the appropriate tiered mitigation measures can be implemented, or until adverse meteorological conditions no longer exist. 					

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<ul style="list-style-type: none"> • The waste placement and/or clay preparation areas shall be moved to a preplanned alternative working location to separate emissions from clay placement construction emissions. • Construction procedures shall be configured such that operations requiring heavy equipment do not occur simultaneously (e.g., clay placement and protective soil placement by scrapers will not be done during periods with adverse meteorological conditions). • Construction scheduling will be slowed to reduce daily equipment usage. • Hours of construction with designated pieces of equipment (e.g., scrapers) shall be constrained to occur outside of peak adverse meteorological conditions. <p>AQ-12 Within three years of start date [July 1, 2001], USA Waste or its successor-in-interest shall submit to the County of Riverside an evaluation of the technological and economical feasibility of using natural gas fuel or other alternative fuel in transfer trucks. The technological feasibility of the evaluation shall include review comments by the South Coast Air Quality Management District. The evaluation shall be subject to County approval. If the County finds that natural gas fuel or other alternative fuel in transfer trucks is technologically and economically feasible, USA Waste or its successor-in-interest shall develop and implement a program to phase-in transfer trucks capable of using these fuels. The program shall be subject to County approval. If the County concludes that transfer trucks capable of using alternative fuels are not technologically and economically feasible, USA Waste or its successor-in-interest shall periodically reevaluate the feasibility of using alternative fuels in transfer trucks. Such reevaluations shall be at least every three (3) years. USA Waste or its successor-in-interest shall, however, conduct such a reevaluation anytime deemed appropriate by County.</p> <p>AQ-13 The project shall provide the required emission reductions of NOx and ROG sufficient to cause no net increase of project emissions.</p> <p>AQ-14 USA Waste shall amend its Policies and Procedures Manual at the landfill to require that heavy construction and operating equipment at the landfill shall not idle for longer than 15 minutes.</p>					

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4. Biological Resources. Would the project:					
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	1998 EIR, § 4.3	No	No	No	No
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	1998 EIR, § 4.3	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	1998 EIR, § 4.3	No	No	No	No
d. Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	1998 EIR, § 4.3	No	No	No	No
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	1998 EIR, § 4.3	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	1998 EIR, § 4.3	No	No	No	No

Environmental Setting /Discussion

The discussion below is based on the Biological Resources Technical Report (BRTR) (Artemis 2024) (Appendix C of this Addendum) that was prepared for the proposed project.

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Most of the proposed project components are located in areas that are already developed or disturbed (i.e., North RNG Site, South RNG Site, along Dawson Canyon Road, and Gas POR Site), so significant habitat loss or modifications are not expected in these areas. However, construction activities for implementation of the proposed project would occur immediately adjacent to (and beneath) Temescal Wash, where natural habitats for multiple special status species occur. Potential impacts could include direct destruction of special status plants, special status fossorial mammal burrows, nests of special status birds, and roosts of special status bats; direct destruction of habitat for riparian special status species in Temescal Wash; and indirect effects from water quality impacts, vehicular traffic, noise and human presence, lighting, toxins, entrapment, and the spread of invasive species. Because the proposed pipeline at Temescal Wash would be bored underneath the riparian area it would eliminate any impacts to the natural habitat within and around the riparian area. Also, potential impacts to special status species are expected to be temporary and not significant, lasting only during the construction phase, with the exception of the potential impact of the spread of invasive species into natural habitats, which could degrade the quality of habitat for special status species in the region. As such, the project design and construction would include avoidance and minimization measures (see Section 5.1.1 of Appendix C of this Addendum) that would be consistent with the *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* (2001) (ESL MSHCP), which was prepared in 2001 for the 50-year landfill expansion to address mitigation for biology impacts. Further, the proposed project would be in compliance with the ESL MSHCP and would not change or affect the ESL MSHCP. During the construction phase, the proposed project would follow the impact avoidance and reduction measures as described in Section 5 Part D of Part 1 of the ESL MSHCP (see Section 5.1.5 of Appendix C of this Addendum).

It is anticipated that there will be some indirect impacts resulting from the proposed project based on its proximity to sensitive habitat and sensitive species (see Section 5.3 of Appendix C of this Addendum). For example, indirect and temporary impacts to wildlife movement due to construction noise, including presence of humans, will be expected during construction of the proposed project. If nighttime work is required for the proposed project, construction lighting may penetrate wildlife habitat within or adjacent to the Study Area¹ that could temporarily impact sensitive wildlife species including the movement of nocturnal species. However, the potential indirect impacts would be maintained at less than significant levels with implementation of best management practices, applicable ESL MSHCP measures, and the avoidance and minimization measures outlined in Section 5.0 of Appendix C of this Addendum.

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>Additionally, the mitigation measures identified in the 1998 EIR to reduce potential biological resources impacts would continue to be enforced upon implementation of the proposed project. Therefore, potential impacts related to species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS) would be less than significant with the implementation of existing mitigation measures and measures consistent with those adopted for the ESL MSHCP.</p> <p>b. <u>Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</u></p> <p>As stated previously, most of the project components are located in areas that are already developed or disturbed, so significant habitat loss or modifications are not expected in these areas. The areas that are most sensitive to proposed project-related construction activities are Temescal Wash and Coldwater Canyon Creek, where riparian habitats and Riversidean Sage Scrub occur. As such, the proposed project has been designed to avoid impacts to the riparian habitats around Temescal Wash and Coldwater Canyon Creek by boring via HDD underneath the streambed. The permits and agreements from the USACE, RWQCB, and CDFW for activities related to HDD underneath Temescal Wash would be obtained and an HDD Frac-out Contingency Plan would be submitted with permit applications and approved by regulatory agencies. This HDD Frac-out Contingency Plan includes drilling procedures and methods prior to, during, and after construction. Therefore, no new significant adverse impacts to riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USWS would occur.</p>					

¹ Study Area includes the North RNG Site, South RNG Site, Gas POR Site, the proposed pipe trench route continuing down Dawson Canyon Road that will be located within the road shoulder, the boring alignment that crosses beneath Temescal Wash, and a buffer that extends either to the top or toe of adjacent slopes (nearest slope edge) depending on the locations.

- c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

As stated above, the proposed project has been designed to avoid impacts to federally protected wetlands within the Temescal Wash downstream of the Dawson Canyon Bridge by utilizing HDD to bore underneath the streambed, so no impacts would occur temporarily or permanently. The applicable permits and agreements mentioned above would be obtained and an HDD Frac-out Contingency Plan would be prepared to avoid and minimize impacts to jurisdictional waters. Therefore, no new significant adverse impacts to state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means would occur.

- d. Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The El Sobrante Landfill lies between Lake Matthews and Estelle Mountain and connects the conserved lands of the Stephen's kangaroo rat (SKR) Lake Matthews-Estelle Mountain Reserve. Because El Sobrante Landfill is made up of open space, it likely provides space for wildlife movement in areas that are not active or blocked with barriers. Movement opportunities for wildlife species within the Study Area are provided by Dawson Canyon Road, which may be used by large and small mammals, and Temescal Wash and Coldwater Canyon Creek, which may be utilized by primarily fish, amphibian, reptile, bird, and large and small mammals. Buildings in the North RNG Site and South RNG Site, and structures such as Dawson Canyon Road Bridge may provide nursery sites for bats. Appropriate soils at the edge of the developed areas or roadsides where construction or trenching would take place may provide habitat for burrowing animals, including SKR and Northwestern San Diego pocket mouse. The proposed project has potential to raise the likelihood of traffic collisions with wildlife, damage or destroy bat nurseries, and damage or destroy mammal burrows during construction. As such, the proposed project would include avoidance and minimization measures (see Section 5.1.4 of Appendix C of this Addendum) that would be consistent with the ESL MSHCP to avoid or minimize impacts to wildlife movement and nurseries. Further, the proposed project would be in compliance with the ESL MSHCP and would not change or affect the ESL MSHCP. During the construction phase, the proposed project would follow the impact avoidance and reduction measures as described in Section 5 Part D of Part 1 of the ESL MSHCP (see Section 5.1.5 of Appendix C of this Addendum). Additionally, the mitigation measures identified in the 1998 EIR to reduce potential biological resources impacts would continue to be enforced upon implementation of the proposed project. Therefore, potential impacts related to wildlife movement corridors associated with the proposed project would be less than significant with the implementation of existing mitigation measures and measures consistent with those adopted for the ESL MSHCP.

- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
 f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Although the proposed project would involve trimming or removing three non-native eucalyptus trees, these trees are not protected by Riverside County Ordinance No. 559 regulating the removal of trees because the ordinance only protects native trees in areas above 5,000-foot elevations. As such, removal of these trees would continue to comply with local ordinances.

As stated previously, the ESL MSHCP was prepared in 2001 for the 50-year landfill expansion to address mitigation for biology impacts. USFWS issued a Section 10 (a) permit and CDFW issued a Section 2081 (b) permit for impacts to two threatened and endangered species, and 29 other sensitive species that were not yet listed as threatened or endangered. Most of the proposed project is located within the limits of the ESL MSHCP. The area of the proposed project that is not within the ESL MSHCP limits, and is being submitted for approval for inclusion into the ESL MSHCP area, includes the approximate 12.64 acres along Dawson Canyon Bridge and Dawson Canyon Road in the southern portion of the project site. The proposed project would comply with the provisions of the ESL MSHCP, and most of the proposed project is located on already developed or disturbed lands. Additionally, the proposed project has been designed to avoid impacts to the riparian habitats of Temescal Wash by boring via HDD underneath the streambed. Further, the proposed project would be in compliance with the ESL MSHCP and would not change or affect the ESL MSHCP. During the construction phase, the proposed project would follow the impact avoidance and reduction measures as described in Section 5 Part D of Part 1 of the ESL MSHCP (see Section 5.1.5 of Appendix C of this Addendum). Therefore, no new significant adverse impacts to policies protecting biological resources or habitat conservation plans associated with the proposed project would occur.

Mitigation Measures, Conditions of Approval or Regulatory Requirements

Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:

- B-1 Development shall be phased so that the area to be disturbed shall be minimized. Restoration of previously disturbed areas shall be performed in accordance with the *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.
- B-2 Areas within the landfill limits of disturbance shall be restored with Riverside sage scrub in accordance with the *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.
- B-3 Dudleya salvaging and restoration shall be performed in accordance with the *Multiple Species Habitat Conservation Plan for the El Sobrante Landfill* and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
B-4	Prior to disturbance to wetland/riparian areas, a wetland compensation and mitigation plan shall be developed in consultation with the ACOE, if a 404 Permit is required, the CDFW, pursuant to Section 1603 of the California Fish and Game Code, the RWQCB, pursuant to 401 Water Quality requirements and/or policies to protect wetlands, and the USFWS, if consultation is triggered pursuant to Section 7 of the Endangered Species Act. Mitigation of riparian habitats shall be targeted at a 3:1 ratio with compensation of 6.36 acres. Target mitigation of an additional 1.28 acres of riparian herb vegetation shall be at a 1:1 ratio. Final determination of mitigation ratios shall be made subsequent to onsite evaluation by the ACOE, CDFW, RWQCB, and/or USFWS and shall not be unreasonable or arbitrary.				
B-5	Activities to mitigate the disturbance to wetlands may include, but are not limited to: <ul style="list-style-type: none"> • Identification and assessment of sites and specific riparian mitigation measures along Temescal Wash. • Enhancement of degraded areas within existing channels. • Weed removal to improve existing riparian habitat. • Potential purchase of offsite riparian habitat. 				
B-6	The purchase of offsite riparian/wetland habitat shall be incorporated into the mitigation plan in the event that the ACOE Section 404 permit and CDFW Section 1603 agreement process conclude that onsite enhancement and offsite mitigation along Temescal Wash could not provide sufficient compensation for disturbance to onsite riparian habitat. If this mitigation were implemented, surveys shall be conducted in coordination with USFWS and CDFW to identify offsite riparian habitat that would be suitable for purchase as mitigation for onsite habitat disturbance. Considerations shall include, but not be limited to: <ul style="list-style-type: none"> • Proximity to landfill site. • Similarity of adjacent habitat. • Management plans. • Comparability. • Sustainability. • Cost. 				
B-7	Wetland/riparian habitat mitigation shall be implemented in accordance with all permits, approvals, and/or agreements as may be required by ACOE, CDFW, RWQCB, and/or USFWS.				

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
B-8	Landfill personnel shall be instructed as to the requirement for and importance of restoration of completed areas of the site.				
B-9	Approximately 406 acres of undisturbed open space, upon which a Declaration of Conservation Covenants and Restrictions has been recorded in favor of CDFW and USFWS, shall be maintained and managed for the benefit of Covered Species, pursuant to federal and state incidental take permits and the Multiple Species Habitat Conservation Plan for the El Sobrante Landfill and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.				
B-10	Pursuant to Section 5 of the Agreement, USA Waste or its successor-in-interest shall pay the County a per ton charge for the deposit of Non-County waste at El Sobrante Landfill, \$1.50 of which shall be utilized for multi-species habitat acquisition and management, including planning and research activities, as provided in Section 10.7 of the Agreement and as approved by the Board of Supervisors on September 1, 1998. Monies to be utilized for multispecies purposes shall be deposited in a trust fund administered by the Executive Officer of the County.				
B-11	In the unlikely event that out-of-County waste ceases to be disposed of at El Sobrante, use of the 60 million tons of air space currently allocated for out-of-County waste shall include the requirement for payment of \$1.00 per ton for multispecies habitat acquisition and management.				
B-12	Lighting at the working face shall be downcast and shielded to minimize reflection, and shall be directed inward toward the landfill.				
B-13	A predator monitoring and control plan shall be implemented in accordance with the <i>Multiple Species Habitat Conservation Plan for the El Sobrante Landfill</i> and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.				
B-14	Brush clearing and habitat removal in each phase of landfill expansion will not be allowed to occur between February 1 and August 15, pursuant to the <i>Multiple Species Habitat Conservation Plan for the El Sobrante Landfill</i> and its Implementing Agreement, both dated July 2001, and any approved modifications or amendments thereto.				
B-15	When the landfill expansion is complete (i.e., after closure of all phases and at the end of the postclosure monitoring maintenance period [currently a minimum of 30 years]), including all restoration activities in accordance with the <i>Multiple Species Habitat Conservation Plan for the El Sobrante Landfill</i> and its Implementing Agreement, both dated July 2001, and any approved				

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>modifications or amendments thereto, the area of onsite disturbance (approximately 645 acres) shall be kept in permanent conservation through a conservation easement in favor of the CDFW. In the event that CDFW revokes its acceptance of the conservations easement, the land shall be placed into conservation with the County, or other County-designated entity, such as Western Riverside County Regional Conservation Authority as approved by the US Fish and Wildlife Service and the El Sobrante habitat management committee.</p> <p>B-16 USA Waste or its successor-in-interest shall continue to include the County in all aspects of future permitting processes involving USFWS, pursuant to Section 7 of the Endangered Species Act, CDFW, pursuant to Section 1603 of the California Fish and Game Code, ACOE 404 permitting, and RWQCB, pursuant to 401 Water Quality requirements and/or policies to protect wetlands.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
5. Cultural Resources. Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	1998 EIR, § 4.9 and 4.10; 2009 SEIR, Appendix A § 14	No	No	No	No
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	1998 EIR, § 4.9 and 4.10; 2009 SEIR, Appendix A § 14	No	No	No	No
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	1998 EIR, § 4.9 and 4.10; 2009 SEIR, Appendix A § 14	No	No	No	No

Environmental Setting/Discussion

The discussion below is based on Cultural Resources Report (AECOM 2024a) (Appendix D of this Addendum) prepared for the proposed project.

A records search for the project site and a 0.5-mile search radius was completed in the California Historical Resources Information System at the Eastern Information Center (EIC), located at the University of California, Riverside. Supplemental research included review of the National Register of Historic Places, California Register of Historical Resources; and other national, state, and local registers. Additional archival research included research of online repositories such as review of historic maps (historic aerials, historic topographical maps), the Built Environment Resources Directory, geology maps, and ethnographic maps prepared by local historians, early anthropologists, and modern Native American tribal leaders. A Sacred Lands File (SLF) request was solicited from the Native American Heritage Commission (NAHC) to identify tribal cultural resources and traditional sites that might be impacted by the proposed project. An intensive-level pedestrian archaeological survey of the project area was performed.

- a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?
- b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- c. Disturb any human remains, including those interred outside of dedicated cemeteries?

The 1998 EIR found no sites of historical significance on or near the landfill area and concluded that no significant impacts to historical resources would occur. However, the landfill area was determined to have a high potential for archeological and paleontological resources, which necessitated archeological and paleontological assessments as part of the 1998 EIR. The mitigation measures stemming from these assessments were incorporated into the 1998 EIR and have resulted in ongoing cultural resources surveying/monitoring. There are seven archaeological sites (CA-RIV-1143, CA-RIV-1144, CA-RIV-1146, CA-RIV-1148, CA-RIV-1651, CA-RIV-4307, and CA-RIV-4981) within the landfill site boundary, and one site (CA-RIV-1147) that is outside of, but immediately adjacent to, the site boundary that are surveyed on a biannual basis.

Based on the results of archival research, the Native American outreach program, and the field survey, no new or previously recorded cultural resources were identified in the project area. Sites P-33-003832 and P-33-000078, identified during the EIC records search, were confirmed to be present in the project vicinity, outside the project footprint. However, an assessment of archaeological sensitivity indicates that the southern end of the project area, extending from the intersection of Temescal Canyon Road and Dawson Canyon Road, along Dawson Canyon Road until the road turns north and starts going uphill, exhibits moderate potential to encounter archaeological resources, based on proximity to previously recorded resources, natural setting, and presence of soils with potential for buried deposits. The proposed project would include excavation activities, which could have the potential to inadvertently uncover archaeological resources, tribal cultural resources, and unknown human remains. As such, the mitigation measures identified in the 1998 EIR to address cultural resources would continue to be enforced upon implementation of the proposed project, which would include the continuation of monitoring, testing, and/or preservation or data recovery excavation by certified archaeologists (if necessary) for future grading and other disturbance-related activities within and in close

proximity to identified archaeological sites. No monitoring is recommended currently for construction activities where Dawson Canyon Road turns north and ascends northward upslope, because soils in this area exhibit more clear evidence of disturbance, they likely are older and less likely to contain archaeological resources, and the project area is not as close to previously recorded sites and sensitive landscape features, such as low slopes and freshwater resources. If archaeological resources are encountered during ground-disturbing activities in areas determined not to require monitoring or following completion of monitoring in the archaeologically sensitive area, work should be halted temporarily in the vicinity of the find and a qualified archaeologist should be contacted to evaluate and determine appropriate treatment of the resource, in accordance with Section 21083.2(i) of the Public Resources Code. Accordingly, with the continued enforcement of existing mitigation measures associated with cultural resources, no substantial changes to the circumstances under which the proposed project would be undertaken regarding the proposed project's potential impacts to cultural resources would occur. Therefore, potential impacts related to cultural resources would be less than significant with the implementation of existing mitigation measures, supplemented with recommendations that are based on the present context of the project site and are consistent with and meet the intent of the existing, previously adopted mitigation measures.

Mitigation Measures, Conditions of Approval or Regulatory Requirements

Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project (and as modified herein; see Section 19, Tribal Cultural Resources) will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:

- C-1 Prior to grading, a Registered Professional Archaeologist (RPA)-certified archaeologist(s) shall be retained, at the expense of the project, to provide surface collection, mapping, and test excavations for identified archaeological sites. If the sites are determined to be important, the resources within these sites shall be either preserved or a data recovery excavation shall be conducted. If necessary, a RPA-certified archeologist(s) shall oversee development and implementation of worker environmental awareness program (WEAP) training before the start of construction and to conduct and coordinate archaeological and tribal monitoring in sensitive portions of the project area.
- C-2 Routine road or stormwater facilities, maintenance or other land-altering activities in the vicinity of sites shall be monitored by a Registered Professional Archaeologist (RPA)-certified archaeologist to prevent inadvertent disturbance or loss of important resources.
- C-3 The status of the sites shall be monitored on a semi-yearly basis to assure that incidental disturbance or recreational collection of resources has not occurred.
- C-4 In the event of an accidental discovery or recognition of any human remains, Section 7050.5 of the Health and Safety Code and the protocol in Public Resources Code (PRC) Sections 5097.98 and 5098 must be followed. In this instance, once project-related earthmoving begins and if there is accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps shall be taken:

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<ul style="list-style-type: none"> • There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, then the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the "most likely descendant" of the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98, or • Where the following conditions occur, the landowner or his authorized representative shall reburial the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the property in a location not subject to further subsurface disturbance: <ul style="list-style-type: none"> ○ The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being granted access to the site; ○ The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner. <p>C-5 The approved archaeological mitigation measures shall be affixed to all copies of the project grading plans.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
6. Energy. Would the project:					
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	N/A	N/A	N/A	N/A	N/A
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	N/A	N/A	N/A	N/A	N/A
<p><u>Environmental Setting/Discussion</u></p> <p>The discussion below is based on Energy Impacts Study (TAHA 2024b) (Appendix E of this Addendum) prepared for the proposed project.</p> <p>a. <u>Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</u></p> <p>The following analysis discusses short-term (construction) and long-term (operational) use of petroleum fuels, electricity, and natural gas that would result from implementation of the proposed project.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?																		
<p>Petroleum</p> <p><u>Construction</u></p> <p>Petroleum fuels would be consumed during construction of the proposed project by heavy-duty equipment, on-site trucks, on-road truck trips delivering facility components and cement for foundations, and on-road vehicle trips by construction crews. Table 3-4 presents a summary of the one-time expenditure of petroleum fuels that would be required during the 18-month RNG Facility construction period. Construction activities would consume approximately 73,161 gallons of diesel fuel in total. The annual diesel fuel consumption would represent less than 0.05 percent of 2022 countywide retail sales. RNG Facility construction crew vehicle trips would also consume approximately 14,258 gallons of gasoline over the 18-month construction period. This incremental increase in petroleum fuels demand to construct the proposed project would not place a disproportionate burden on available petroleum fuel supply.</p> <p style="text-align: center;">Table 3-4: Proposed Project Construction Petroleum Demand</p> <table border="1" data-bbox="184 886 1965 1295"> <thead> <tr> <th data-bbox="184 886 1129 932">Fuel Type and End Use</th> <th data-bbox="1129 886 1965 932">Fuel Consumption (Gallons)</th> </tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="184 932 1965 977">DIESEL</td> </tr> <tr> <td data-bbox="184 977 1129 1023">RNG Facility Component Deliveries</td> <td data-bbox="1129 977 1965 1023" style="text-align: right;">24,810</td> </tr> <tr> <td data-bbox="184 1023 1129 1068">RNG Facility Construction Off-Road Equipment</td> <td data-bbox="1129 1023 1965 1068" style="text-align: right;">32,381</td> </tr> <tr> <td data-bbox="184 1068 1129 1114">RNG Facility Construction Truck Trips</td> <td data-bbox="1129 1068 1965 1114" style="text-align: right;">15,970</td> </tr> <tr> <td data-bbox="184 1114 1129 1159" style="text-align: right;">Total Diesel Consumption</td> <td data-bbox="1129 1114 1965 1159" style="text-align: right;">73,161</td> </tr> <tr> <td colspan="2" data-bbox="184 1159 1965 1205">GASOLINE</td> </tr> <tr> <td data-bbox="184 1205 1129 1250">Construction Crew – RNG Facility Construction (Total)</td> <td data-bbox="1129 1205 1965 1250" style="text-align: right;">14,258</td> </tr> <tr> <td colspan="2" data-bbox="184 1250 1965 1295">Source: TAHA, 2024</td> </tr> </tbody> </table>						Fuel Type and End Use	Fuel Consumption (Gallons)	DIESEL		RNG Facility Component Deliveries	24,810	RNG Facility Construction Off-Road Equipment	32,381	RNG Facility Construction Truck Trips	15,970	Total Diesel Consumption	73,161	GASOLINE		Construction Crew – RNG Facility Construction (Total)	14,258	Source: TAHA, 2024	
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Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
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The proposed project would adhere to best management practices to avoid the potential for the wasteful consumption of petroleum fuels, such as ensuring that equipment operates within optimum manufacturer specifications and enforcing the restriction on heavy-duty diesel vehicle idling time to five minutes in compliance with CARB’s Airborne Toxics Control Measure 2485. Therefore, because petroleum use would be minimized to the extent feasible and represents a relatively small amount of regional fuel consumption, construction of the proposed project would result in a less than significant impact related to wasteful, inefficient, or unnecessary consumption of petroleum.

Operations

Operation of the proposed project would involve the consumption of petroleum fuels in the employee vehicles traveling to and from the project site and occasional maintenance vehicle trips. As shown in **Table 3-5**, proposed project operations would require approximately 2,973 gallons of gasoline and 1,065 gallons of diesel fuel annually. Proposed project operations would not result in wasteful consumption of petroleum fuels; this impact would be less than significant.

Table 3-5: Proposed Project Operations Annual Energy Demand

Energy Resource and End Use	Energy Consumption
GASOLINE	
Toro RNG Facility Employee Trips (Gallons)	2,973
DIESEL FUEL	
Onsite Maintenance Truck Trips (Gallons)	1,065
ELECTRICITY	
RNG Facility Power (MWh)	61,320
RNG Facility Utility Building Power (MWh)	31
Total Annual Electricity (MWh)	61,351
NATURAL GAS	
RNG Facility Natural Gas Production (MMBTU)	3,139,000
Source: TAHA, 2024	

Electricity

Construction

Construction of the proposed project may require electricity for operation of electrically powered hand tools. However, electricity to the site would be provided by diesel generators or connection to the existing SCE grid. Therefore, construction of the proposed project would result in a less than significant impact related to wasteful or inefficient consumption of electricity.

Operations

Implementation of the proposed project would require additional permanent electricity consumption associated with operation of the RNG Facility and the utility and maintenance building, as summarized in **Table 3-5**. The increase in annual electricity demand would not place an undue burden on SCE power supply or grid reliability. Therefore, implementation of the proposed project would have a less than significant impact related to operational electricity consumption.

Natural Gas

Construction

Construction of the proposed project would not involve end uses of natural gas. Therefore, construction of the proposed project would result in a less than significant impact related to wasteful or inefficient consumption of natural gas.

Operations

Implementation of the proposed project would divert LFG through the RNG Facility and produce up to 8,600 MMBTU of RNG daily. The proposed project would provide a new source of renewable energy and would contribute to regional efforts to reduce reliance on nonrenewable resources. Therefore, implementation of the proposed project would have a less than significant impact related to operational natural gas consumption.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Implementation of the proposed project would not conflict with or obstruct any State, regional, or local plan involving the expansion of renewable energy resources or improving energy efficiency. The proposed project would provide a net energy benefit by producing approximately 8,600 MMBTU of RNG on a daily basis. **Table 3-6** below summarizes the most directly applicable plans and policies enacted for the purpose of managing energy resource consumption and conservation and provides a brief description of the proposed project's

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
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influence on implementation of the provisions therein. Implementation of the proposed project would not impede efforts to improve energy efficiency or expand renewable resources. Therefore, this impact would be less than significant.

Table 3-6: Consistency with Energy Management Plans

Plan Goal, Objective, or Target	Project Evaluation
<p>CARB Truck and Bus Regulation (2008, Amended 2014): By January 1, 2023, all drayage trucks must have 2010 model year or newer engines.</p>	<p>Consistent. Implementation of the proposed project would not generate new truck trips within the greater Riverside County area. All commercial heavy-duty trucks serving the RNG Facility will be required to comply with the requirements set forth in the CARB Truck and Bus Regulation. Proposed project construction and operations would not impede the phasing out of trucks with older engines failing to comply with the regulation.</p>
<p>CARB Sustainable Freight Action Plan (2015): Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.</p>	<p>Consistent. The proposed project would not hinder the State’s efforts to implement near-zero- and zero-emission technologies. The fleet of trucks and equipment used at the RNG Facility would be turned over at similar rates consistent with the rest of the operations and the greater SCAG region.</p>
<p>Source: TAHA, 2024</p>	

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
7. Geology and Soils. Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides? 	1998 EIR, § 4.1	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
b. Result in substantial soil erosion or the loss of topsoil?	1998 EIR, § 4.1.2	No	No	No	No
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	1998 EIR, § 4.1; 1998 EIR, Appendix A, Attachment D	No	No	No	No
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	1998 EIR, § 4.1.1.6	No	No	No	No
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the	Not Previously Assessed	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
disposal of waste water?					
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic features?					

Environmental Setting/Discussion

The discussion below is based on Geotechnical Investigation Report (HAI 2023) (Appendix F1 of this Addendum), Geotechnical Exploration and Recommendations Report (WSP 2022) (Appendix F2 of this Addendum), Paleontological Memorandum (AECOM 2024b) (Appendix G of this Addendum), and Flood Risk Summary Memo (Blue Ocean Civil Consulting 2023) (Appendix H of this Addendum) prepared for the proposed project.

- a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault?
 - ii. Strong seismic ground shaking?
 - iii. Seismic-related ground failure, including liquefaction?
 - iv. Landslides?

The proposed project consists of installing and operating the RNG Facility at the existing El Sobrante Landfill within three previously disturbed areas. Active faults have not been mapped within the landfill boundary and the project site is not located within an Alquist-Priolo Earthquake Fault Zone. The proposed project would not be built on an area of known geologic hazards and would not expose people or structures to substantial adverse effect from a rupture of a known earthquake fault. It would be designed in accordance with existing geology and soils-related mitigation measures for the landfill, and any additional recommendations identified in the geotechnical exploration and recommendations report and geotechnical investigation report prepared for the proposed project, such that the proposed project would not expose people or structure to substantial adverse effects associated with strong seismic ground shaking, seismic stability of the landfill, and/or

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>landslides. The proposed RNG Facility would be designed in accordance with the California Building Code and local practices and ordinances (County of Riverside Building Code). Therefore, no new significant adverse impacts related to exposure of people or structures to seismic hazards would occur.</p> <p>b. <u>Result in substantial soil erosion or the loss of topsoil?</u></p> <p>As indicated in the 1998 EIR, erosion, sedimentation and flooding caused by an earthquake are precluded by the design of the landfill. The JTD for the landfill provides operational characteristics consistent with the Report of Waste Discharge (ROWD) requirements found in CCR Title 27. The proposed construction of a RNG Facility would be completed consistent with requirements and Best Management Practices as found in the JTD for the landfill with respect to design for soil erosion/loss of topsoil, etc.</p> <p>The Gas POR Site is located south of Coldwater Canyon Wash (CCW) and west of Temescal Canyon Wash, and is in a Federal Emergency Management Agency (FEMA) special flood hazard areas (SFHA) Zone AE, with an effective Base Flood Elevation (BFE) of between 927 and 932 feet. Separately, a Riverside County Flood Control (RCFC) flood hazard zone (FHZ) associated with CCW has been established based on a Special Study. As such, the proposed project, specifically the Gas POR Site, has been designed to not encroach into CCW defined slopes that designate the existing floodway. The proposed project design would maintain a finished floor and equipment elevation of 933 feet minimum, which is one foot above the effective BFE of 932 feet. Although this elevation is appropriate to minimize flood hazard risk based on the effective Flood Insurance Rate Map, it is also conservative considering the existing conditions and likely future development. Updated flood models based on existing topography and Dawson Canyon Road Bridge geometry show that the one percent annual chance flood is contained within the Temescal Wash main channel in the vicinity of the project site. Localized flooding on the project site due to CCW would be insignificant, as flood water would seek Temescal Wash through lower lying areas relative to the proposed project. In addition, potential lateral erosion along the north edge of the Gas POR Site in CCW would be monitored as part of an erosion control plan that would be implemented as needed.</p> <p>Therefore, no new significant adverse impacts related to substantial soil erosion or loss of topsoil would occur.</p> <p>c. <u>Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?</u></p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>The Initial Study prepared for the 2009 SEIR concluded that the landfill was not located within an Alquist-Priolo Earthquake Fault Zone or an existing County Fault Hazard Zone or a Recommended Fault Hazard Zone. There are no site conditions that indicate the potential of ground rupture due to faulting, subsidence or liquefaction during earthquake ground shaking, landslides or lurching of exposed slope faces (1998 EIR). Also, the recommendations presented in the above-mentioned geotechnical reports would be incorporated into design and construction of the RNG Facility. Therefore, no new significant adverse impacts related to unstable soils would occur.</p> <p>d. <u>Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</u></p> <p>As identified in the 1998 EIR, limited areas of expansive soils with a low expansion index have been identified at the landfill. Existing mitigation measures require that expansive index testing be performed to verify the suitability of native soils for fill materials, which would be included as part of the geotechnical and soils investigation described in section (a) above to support the construction and operation of the RNG Facility, as well as with all other landfill slopes and the perimeter drainage and access road per County of Riverside Building Code and CCR Title 27. If testing indicates a potential for high expansiveness in the soil, such soils shall be either treated (e.g. mixed with non-expansive soils) or removed. Therefore, no new significant adverse impacts related to expansive soils would occur.</p> <p>e. <u>Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?</u></p> <p>While this CEQA element was not analyzed in the 1998 EIR or 2009 SEIR, it was addressed within the 2018 Addendum that included a septic system as part of the maintenance shop. For the proposed project, a holding tank that will collect both sanitary sewage from the proposed maintenance building as well as treated condensate/leachate derived from the landfill gas as part of the RNG process is proposed, which would be designed to be in compliance with the appropriate County Department of Environmental Health standards, and all appropriate permits would be obtained. The collected sanitary sewage would meet the Temescal Valley Water District (TVWA) discharge parameters and would be pumped through a force main that will deliver the sanitary sewage down the haul road to a manhole just prior to the bridge. The proposed project would not include additional onsite wastewater treatment systems such as seepage pits or leach field. Therefore, implementation of the proposed project is not anticipated to result in any significant adverse impacts associated with the use of septic tank/leach field system.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>f. <u>Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</u></p>					
<p>According to the Paleontological Memorandum (AECOM 2024b) (Appendix G of this Addendum), the proposed project has the potential to impact several geologic units rated as having high paleontological potential. Excavation for the pipe trench between the South RNG Site and North RNG Site would impact the Lake Matthews Formation (Tlm). The HDD boring process would impact young axial channel deposits (Qya) and possibly an underlying deposit beneath the Temescal Canyon Wash. Although Qya deposits are rated as having low paleontological potential at the surface, paleontological potential increases with depth and Pleistocene fossils have been found at a depth of 20 feet, which is the minimum depth of HDD boring at the center of the wash. As such, prior to ground disturbance, development of a paleontological monitoring and mitigation program with provisions for testing sediment samples for microvertebrate fossils by a qualified professional paleontologist is recommended for project activities within these formations. This recommendation matches the existing Mitigation Measures P-1 and P-2 as shown below. Project activities are not anticipated to impact the Silverado Formation (Tsi). As such, project activities within the formations with low potential or those with high potential that will not be impacted by the project activities (e.g., Silverado Formation) would not require monitoring. Therefore, potential impacts related to directly or indirectly destroying unique paleontological resources would be less than significant with the implementation of existing mitigation measures.</p>					
<p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p>					
<p>Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:</p>					
<p>G-1 The landfill and associated structures shall be designed and constructed to withstand the expected ground motions and potential effects of seismic ground shaking.</p> <p>G-2 Final exterior waste fill slopes shall not be steeper than 1.75:1 with a minimum of one 15-foot wide bench for every 50-feet of vertical height.</p> <p>G-3 A slope or foundation stability report shall be prepared by a registered civil engineer or certified engineering geologist. The report must indicate at least a 1.5 factor of safety for the critical slope under dynamic conditions, or appropriate factor of safety in</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
accordance with applicable regulations.					
G-4	In lieu of achieving a 1.5 factor of safety under dynamic conditions, a more rigorous analytical method that provides a quantified estimate of the magnitude of movement may be employed.				
G-5	Significant slopes (including cut, fill, and waste prism slopes greater than 20 feet high and steeper than 3:1) shall be designed to comply with RWQCB and CALRECYCLE requirements for the identified maximum probable earthquake peak acceleration.				
G-6	RWQCB and CALRECYCLE requirements shall be complied with, and the final cover surface slopes shall be limited to 3:1, based on seismic considerations, with intermediate fill stage heights limited to 70 feet, with 15-foot wide benches to improve stability, unless subsequent analyses verify the acceptability of steeper slopes or greater fill heights. Under no circumstance, however, shall the final exterior waste fill slope be steeper than 1.75:1 (see G-2 above).				
G-7	Slope buttresses shall be provided, if necessary, to increase slope stability and reduce deformations.				
G-8	Parameters developed by geosynthetic and geotechnical testing shall be included in the analysis of liner systems on side slopes. Residual strength values (i.e., after shearing) shall be used, unless control of peak strengths can be demonstrated.				
G-9	A post-earthquake inspection plan shall be submitted to the RWQCB and CALRECYCLE, for approval which provides for detailed site inspection after an earthquake of magnitude (M) 5.0 or greater within 25 miles of the site to determine the integrity of landfill structures and systems. The plan shall identify appropriate measures which may be initiated to correct earthquake-related damage. Also, a routine inspection plan shall be developed and implemented by a registered certified engineer to examine slope conditions.				
G-10	If geotechnical investigations reveal the need for blasting for a specific landfill phase, a blasting study shall be conducted in compliance with County requirements. If such a study is necessary, it shall be conducted by a licensed engineer and submitted to the County Engineering Geologist for approval.				
G-11	If isolated saturated bedrock conditions are encountered in cut slopes, appropriate drainage systems shall be installed. These systems could consist of weep systems, subdrain systems, or the flattening of excavated cut slopes to improve slope stability.				

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G-12	Landfill liners shall be placed over the side slopes, and surface water runoff control systems (e.g., V-ditches at the top of slopes) shall be constructed to prevent uncontrolled flow down the face of the slopes.				
G-13	Structural fills shall be built above ground water and compacted in place to a specific high relative density.				
G-14	Expansive index testing shall be performed to verify the suitability of native soils for fill materials. If testing indicates a potential for high expansiveness in the soil, such soils shall be either treated (e.g., mixed with non-expansive soils) or removed.				
G-15	Blasting shall be conducted in compliance with local building code requirements to prevent damage to structures and new construction from shear waves generated during blasting.				
G-16	Only state-licensed blasters shall be used to design, supervise, and detonate explosives on the site.				
G-17	Seismic monitoring of each blast shall be conducted by an independent, qualified consultant.				
G-18	There shall be no onsite storage of explosives. Explosives shall be transported to the site by the licensed blaster on an as-needed basis.				
G-19	USA Waste shall inform the Riverside County Sheriff’s Department (Sheriff’s Dept.) and the Riverside County Fire Department (Fire Dept.) prior to blasting.				
G-20	USA Waste shall notify neighbors within 1,000 feet of potential blasting areas prior to a blasting episode.				
G-21	A record of each blast shall be retained for at least three years and shall be submitted to the County Building and Safety Department as requested by the Building and Safety Director.				
G-22	Preblast inspections shall be made by a civil engineer licensed by the State of California of residences and facilities existing at the				

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<p>time of landfill permit approval and located within 1,000 feet of potential blasting areas.</p>					
G-23	<p>A letter containing a general description of the blasting operations and precautions, including the blast-warning whistle signals that are required by the State of California Construction Safety orders, shall be sent to residents within a one-half mile radius of the landfill operations by USA Waste in accordance with applicable regulations.</p>				
G-24	<p>Blasting complaints, if any, shall be recorded by USA Waste as to complainant, address, date, time, nature of the complaint, name of the person receiving the complaint, and the complaint investigation conducted. Complaint records shall be made available to the County Engineering Geologist, Planning Department, and Building and Safety Department.</p>				
P-1	<p>A qualified paleontologist shall be retained, at the expense of the project, to monitor ongoing grading or other extensive activities in the Silverado Canyon and Lake Mathews formations. The monitoring program shall reflect the County's intent to research, recover, and preserve significant paleontological resources.</p>				
P-2	<p>In the event that significant paleontological resources are uncovered during excavation, earthmoving and/or grading, work shall be redirected from the area until an appropriate data recovery program can be developed and implemented.</p>				
P-3	<p>Recovered fossils shall be cleaned, cataloged, and identified to the lowest taxon possible. A report containing monitoring results, including an itemized list of fossils, shall be submitted to the County. A copy shall accompany the fossils to an appropriate repository.</p>				
P-4	<p>Collected fossils shall be curated at a public institution with an educational/research interest in the material. The expenses shall be borne by the project.</p>				
P-5	<p>The approved paleontologic mitigation measures shall be affixed to all copies of the project grading plans.</p>				

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
8. Greenhouse Gas Emissions. Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	2009 SEIR, § 4.2	No	No	No	No
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?	2009 SEIR, § 4.2	No	No	No	No
<p><u>Environmental Setting/Discussion</u></p> <p>The discussion below is based on Air Quality and Greenhouse Gas Emissions Report (TAHA 2024a) (Appendix B of this Addendum) prepared for the proposed project.</p> <p>a. <u>Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</u></p> <p>The proposed project would generate greenhouse gas (GHG) emissions directly during temporary construction activities through off-road equipment exhaust and vehicle trips. In accordance with SCAQMD recommendations, the total amount of GHG emissions that would be generated during construction activities is amortized over a 30-year operational lifetime of the proposed project and combined with long-term operational emissions. Future operation of the proposed project would increase regional GHG emissions through the additional vehicle trips to and from the project site (direct emissions) and indirect emissions associated with energy consumption and RNG Facility operations, as well as minor emissions from water consumption and on-site solid waste generation at the RNG utility building. Table 3-7 presents the estimated annual operating GHG emissions that would be generated by the proposed project.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
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Table 3-7: Proposed Project Estimated Greenhouse Gas Emissions

Emissions Source	CO ₂ e (Metric Tons)*
CONSTRUCTION ANALYSIS	
South RNG Site Construction Emissions	46
North RNG Site Construction Emissions	394
Gas POR Site Construction Emissions	225
Underground Pipe Installation Emissions	226
Project Construction Emissions – Total (Direct)	892
LONG-TERM OPERATIONAL ANALYSIS	
Amortized Construction Emissions (Direct)	30
RNG Facility Employee Commute & Maintenance Trips (Direct)	265
RNG Utility Building Energy Consumption (Indirect)	12
RNG Utility Building Water Consumption (Indirect)	2
RNG Utility Building Waste Generation (Indirect)	1
RNG Facility Net Emissions [Existing – Captured] (Direct)	(52,801)
RNG Facility Electricity Consumption (Indirect)	9,685
TOTAL	(42,806)
* Parenthetical notation (#) indicates a negative value. Source: TAHA, 2024	

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>Construction activities would generate a total of approximately 892 MTCO_{2e} over the 18-month duration. Accounting for the indirect emissions from electricity requirements—approximately 9,697 MTCO_{2e} per year—the RNG Facility would offset approximately 42,806 MTCO_{2e} of GHG emissions annually that would have otherwise occurred. As demonstrated by the emissions analysis, the proposed project would contribute to regional efforts to reduce GHG emissions and would provide a new supply of renewable energy resources in the form of RNG. Implementation of the proposed project would provide a net environmental benefit and would aid County initiatives towards achieving the GHG emissions reduction targets established by the 2019 Climate Action Plan (CAP) Update. Therefore, the impact regarding the magnitude of GHG emissions associated with the proposed project would be less than significant.</p>					
<p>b. <u>Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?</u></p>					
<p>There is no potential for the proposed project to conflict with GHG reduction plans such as the California Air Resources Board (CARB) <i>2022 Scoping Plan Update for Achieving Carbon Neutrality</i>, the SCAG Connect SoCal RTP/SCS, or the County’s 2019 CAP Update. Implementation of the proposed project would provide a net environmental benefit through the reduction of GHG emissions as well as the expansion of local renewable energy resource production. Operation of the proposed project would offset GHG emissions by diverting LFG that would have otherwise been flared through the closed RNG system, which would then be used to reduce reliance on natural gas supplied by nonrenewable resources. The proposed project would be consistent with the objectives of the CARB statewide GHG emissions reduction policy, as well as contribute to the 2019 CAP Update goals of reducing community-wide GHG emissions and expanding the availability of renewable energy resources.</p>					
<p>GHG emissions are regionally cumulative in nature, and it is highly unlikely that construction of any individual project would generate GHG emissions of sufficient quantity to conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. The emissions analysis for construction of the proposed project incorporates reasonably conservative assumptions such that the emissions reflect maximum possible emissions, beyond what is expected to occur. Standard construction and operating procedures would be undertaken in accordance with the SCAQMD and CARB regulations applicable to heavy-duty construction equipment and diesel haul trucks to limit unnecessary emissions to the extent practicable. Adhering to requirements pertinent to equipment maintenance and inspections and emissions standards, as well as diesel fleet requirements—including idling time restrictions and maintenance—would ensure that construction and operational activities associated with the proposed project would not conflict with GHG emissions reductions efforts. Therefore, this impact would be less than significant.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p> <p>There are no mitigation measures, conditions of approval, or regulatory requirements related to this environmental factor.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
9. Hazards and Hazardous Materials. Would the project:					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Not Previously Assessed	No	No	No	No
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	2009 SEIR, § 4.4	No	No	No	No
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Not Previously Assessed	No	No	No	No
d. Be located on a site which is included on a list of hazardous	Not Previously Assessed	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?					
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	Not Previously Assessed	No	No	No	No
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	1998 EIR, Appendix A, § 39. 2009 SEIR, § 4.4	No	No	No	No
g. Expose people or structures, either	2009 SEIR, § 4.4	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?					

Environmental Setting/Discussion

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction of the proposed project would involve transport, use, and disposal of limited quantities of hazardous materials such as paints, solvents, cleaning agents, oils, grease, and fuel for construction equipment. However, the proposed project would comply with all federal, state, and local requirements related to the transport, use, and disposal of such materials.

Implementation of the proposed project would continue existing operations at the El Sobrante Landfill. As discussed in the 2009 SEIR, concerns associated with leachate, hazardous substances, and the generation of methane gas at the landfill, are associated with long-term maintenance of the landfill areas, and the proposed project would not result in an increase in any of these adverse conditions. The proposed project would extract landfill gas; undergo a purification process; and transform the purified methane into a clean and pipeline-quality renewable gas. Moreover, landfill gas collection systems designed for the collection of gas already are in place and a methane gas monitoring program has been implemented. As such, the risk of an accidental explosion of such gases is currently addressed and remediated as part of ongoing monitoring efforts that would extend to operation of the RNG Facility. As a safety precaution, the RNG plant will be equipped with both a manual shut-off system as well as an automatic shut-off system that functions based on detected pressure drops. Additionally, all accessible pipe flanges would be inspected on a monthly basis for any possible leaks. Although the proposed RNG Sites would not receive or process any leachate from the landfill, measures are in place to respond to the potential release of leachate and exposure to hazardous waste. Condensate that is generated through gas compression will be treated according to applicable regulations for wastewater generation. As such, impacts related to accidental explosion or release of hazardous substances would not increase with implementation of the proposed project. Potential impacts would continue to be less than significant. No additional analysis is required.

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
					<p>c. <u>Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</u></p> <p>No schools are located within one-quarter mile of the El Sobrante Landfill. The nearest school (Temescal Valley Elementary School) is located approximately 0.45 miles west of the project site across I-15. Furthermore, the proposed project would not result in an increase in permitted daily tonnage or in the types of waste currently allowed for disposal at the El Sobrante Landfill. The proposed project would extract landfill gas; undergo a purification process; and transform the purified methane into a clean and pipeline-quality renewable gas. Therefore, the proposed project would not result in the transport, use or disposal of hazardous materials within one-quarter mile of an existing school. No impacts would result and no further analysis of this issue is required.</p> <p>d. <u>Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</u></p> <p>Based on a search of the Government Code Section 65962.5 “Cortese” list, the El Sobrante Landfill is not listed as a hazardous materials site and is not near any superfund or cleanup sites. According to the State Water Resources Control Board, there are no Underground Storage Tanks in the vicinity of the landfill. In addition, the landfill accepts only Class III municipal solid waste, which excludes hazardous materials. Implementation of the proposed project would continue existing operations at the El Sobrante Landfill. No impacts would result and no further analysis of this issue is required.</p> <p>e. <u>For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?</u></p> <p>There are no airports existing or planned within the vicinity of the project site. The nearest airport to the project site is the Corona Municipal Airport, which is located approximately 10 miles to the northwest. Thus, the proposed project would not result in a safety hazard for people residing or working in the project area. No impacts would result and no further analysis of this issue is required.</p>

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<p>f. <u>Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</u></p> <p>As discussed in the 1998 EIR, the El Sobrante Landfill does not interfere with an emergency response plan or an emergency evacuation plan because the project site is located in a remote area. As discussed in the 2009 SEIR, the El Sobrante Landfill Health and Safety Plan would continue to address emergency issues and protocol in the event that an emergency situation occurs. No impacts would result and no further analysis of this issue is required.</p> <p>g. <u>Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?</u></p> <p>As discussed in the 2009 SEIR, the El Sobrante Landfill has implemented a Fire Management Plan to address fire hazards at the site. The proposed project would be in compliance with the Fire Management Plan; therefore, any perceived increase in fire hazards for adjacent open space areas is considered less than significant. No additional analysis is required.</p> <p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p> <p>Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:</p> <p>U-1 Access roads/streets shall be wide enough to accommodate movement and parking without hindering the flow of traffic. Roadway modifications shall be designed to provide smooth and orderly traffic flow and shall be well lighted.</p> <p>U-2 Warning or caution signs shall be placed on Temescal Canyon Road and the El Sobrante access road to indicate the presence of slow-moving traffic/trucks.</p> <p>U-3 Upon assignment of a numbered street address by the County, the project entrance shall be clearly marked with address numbers.</p>					

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U-4	Buildings shall be constructed with fire retardant roofing material as approved by the County Fire Department.				
U-5	Water mains and fire hydrants providing required fire flows shall be constructed subject to approval by the County Fire Department.				
U-6	Prior to approval of any development plan for lands adjacent to open space areas, a fire protection/revegetation management plan shall be submitted to the Riverside County Fire Department for review and comment.				
U-7	Landfill equipment operators, waste transfer vehicle drivers, and landfill personnel assigned to nighttime operations shall have appropriate training for night operation of heavy equipment.				
U-8	Portable lights shall be used at the working face to provide a safe working environment during nighttime operations.				
U-9	The landfill access road and onsite roads to the working face shall be equipped with reflectors, reflective cones, reflective barriers and signs.				
U-10	Public access to the landfill shall be restricted to the hours of 6:00 a.m. to 6:00 p.m.				

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10. Hydrology and Water Quality. Would the project:					
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	1998 EIR § 4.2	No	No	No	No
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	1998 EIR § 4.2.2.2	No	No	No	No
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	1998 EIR § 4.2.1.1.2	No	No	No	No
i. result in a substantial erosion	1998 EIR § 4.2.3.2.4	No	No	No	No

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or siltation on- or off-site;					
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	1998 EIR § 4.2.3.2.4	No	No	No	No
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	1998 EIR § 4.2.3.2.4	No	No	No	No
iv. impede or redirect flood flows?	1998 EIR § 4.2 (the 1998 EIR did not identify the landfill as part of a mapped 100-year flood plain)	No	No	No	No
d. In flood hazard, tsunami, or seiche zones, risk release of	1998 EIR § 4.2 (the 1998 EIR did not identify the landfill	No	No	No	No

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pollutants due to project inundation?	as part of a mapped 100-year flood plain)				
e. Conflict with or obstruct implementation or a water quality control plan or sustainable groundwater management plan?	1998 EIR § 4.2	No	No	No	No

Environmental Setting/Discussion

The discussion below is based on Geotechnical Investigation Report (HAI 2023) (Appendix F1 of this Addendum), Geotechnical Exploration and Recommendations Report (WSP 2022) (Appendix F2 of this Addendum), and Flood Risk Summary Memo (Blue Ocean Civil Consulting 2023) (Appendix H of this Addendum) prepared for the proposed project.

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The landfill currently operates under state and federal regulations, including, but not limited to, California Code of Regulations (CCR) Title 27, Division 2, and 40 CFR 258 (in accordance with State Water Resources Control Board Resolution 93-62). The primary operating permits/approvals for the landfill are SWFP No. 33-AA-0217 issued by the County of Riverside Department of Environmental Health as the designated LEA, Waste Discharge Requirements (WDR) Order Number R8-202016-034 from the California Regional Water Quality Control Board – Santa Ana Region (RWQCB) and numerous permits to construct/operate issued by the South Coast Air Quality Management District. The proposed RNG Sites would be constructed on the existing graded landfill pads; proposed Gas POR Site within the existing shoulder turnout approximately 600 feet northeast of the Temescal Canyon Road and Dawson Canyon Road intersection; and underground piping installed within pipe trenches in the existing pavement or shoulder of the landfill access road, or bored beneath Temescal Canyon Wash (to avoid disturbance), and in the public right-of-way within Temescal Canyon Road. As such, the proposed project would maintain a similar drainage pattern compared to existing conditions and continue with the current surface water control systems, and construction and operation of the proposed project would be required to comply with these regulations. Potential lateral erosion along the north edge of the Gas POR

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<p>Site in CCW would be monitored as part of an erosion control plan that would be implemented as needed. Also, the proposed project would be in compliance with applicable regulations for stormwater runoff and continue to implement existing Best Management Practices (BMPs) for erosion/sediment control. The proposed RNG Sites would not receive or process any leachate from the landfill. Condensate that is generated through gas compression will be treated according to applicable regulations for wastewater generation. Therefore, no new significant adverse impacts related to water quality standards or waste discharge requirements would occur.</p>					
<p>b. <u>Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</u></p>					
<p>Section 4.2.2.2 of the 1998 EIR concluded that the landfill is located on a non-water bearing zone. Depth to groundwater at the landfill is variable across the site. The 1998 EIR concluded that groundwater is no deeper than 20 feet below grade in the canyons and depth to confined ground water can be as much as 200 feet below grade. In addition, two geotechnical studies were conducted for the proposed RNG Sites and Gas POR Site: <i>Geotechnical Exploration and Recommendations Report for Proposed RNG Facility</i> (WSP 2022) and <i>Geotechnical Investigation Report</i> (HAI 2023), respectively. Groundwater was not encountered in any of the borings drilled at the proposed RNG Sites, which reached depths of 51 feet below ground surface (bgs). During the subsurface exploration at the proposed Gas POR Site, groundwater was encountered at roughly 29 feet bgs. The proposed project would not require use of groundwater or interfere with groundwater recharge. Therefore, no new significant adverse impacts related to groundwater or groundwater recharge would occur.</p>					
<p>c. <u>Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:</u></p> <ul style="list-style-type: none"> i. <u>result in a substantial erosion or siltation on- or off-site;</u> ii. <u>substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</u> iii. <u>create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or</u> iv. <u>impede or redirect flood flows?</u> 					

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<p>The 1998 EIR identified that the landfill has been constructed over an area with four natural hydrologic drainage basins. The current surface water control systems include run-on diversion berms/ditches that divert off-site waters around the landfill footprint. Run-off from the landfill is handled by a series of V-ditches along the inside of access benches, V-ditches and down drains at drainage concentration points to divert flow down the surface of the landfill, and collection ditches/culverts at the landfill base to convey run-off to the existing ponds and canyons. As stated previously, the proposed RNG Sites would be constructed on the existing graded landfill pads; proposed Gas POR Site within the existing shoulder turnout approximately 600 feet northeast of the Temescal Canyon Road and Dawson Canyon Road intersection; and underground piping installed within pipe trenches in the existing pavement or shoulder of the landfill access road, or bored beneath Temescal Canyon Wash (to avoid disturbance), and in the public right-of-way within Temescal Canyon Road. The pipes underneath the Temescal Canyon Wash would be contained within a continuous 18-inch sleeve under the wash for protection and containment . As such, the proposed project would maintain a similar drainage pattern compared to existing conditions and continue with the current surface water control systems. Potential lateral erosion along the north edge of the Gas POR Site in CCW would be monitored as part of an erosion control plan that would be implemented as needed. Also, the proposed project would be in compliance with applicable regulations for stormwater runoff and continue to implement existing BMPs for erosion/sediment control. Therefore, no new significant adverse impacts related to substantially altering the existing drainage pattern of the site or area would occur.</p>					
<p>d. <u>In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?</u></p> <p>The North RNG Site and South RNG Site have not been identified as being mapped within a 100-year flood zone as defined by the FEMA. Regardless, the current surface water control systems were designed to handle the 100-year, 24-hour storm event. As previously stated, the Gas POR Site has Temescal Canyon Wash to the east and CCW to the north and is in a FEMA SFHA Zone AE, with an effective BFE of between 927 and 932 feet. Separately, a RCFC FHZ associated with CCW has been established based on a Special Study; no flood elevations are determined for this area. As such, a Flood Risk Summary Memo (Blue Ocean, 2023) was prepared to summarize the information gathered from FEMA and the County related to flood hazard and risk mitigation. As a result, the proposed shelters at the Gas POR Site would be designed with a finish floor elevation of 933 feet minimum, one foot above the effective BFE and all water sensitive equipment would be elevated to 933 feet or higher. The Gas POR Site may extend to the top of slope adjacent to CCW via a retaining wall. Retaining wall placement will be in accordance with applicable building code, structure and geotechnical recommendation. The proposed project would not encroach into CCW defined slopes that designate the existing floodway. Although this elevation is appropriate to minimize flood hazard risk based on the effective Flood Insurance Rate Map, it is also conservative considering the existing conditions and likely future development. Updated flood models based on existing topography and bridge geometry show that the one percent annual chance flood is contained within the Temescal Wash main</p>					

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<p>channel in the vicinity of the Gas POR Site. Localized flooding on the Gas POR Site due to CCW would be insignificant as flood water would seek Temescal Wash through lower lying areas relative to the project site. Potential lateral erosion along the north edge of the Gas POR Site in CCW would be monitored as part of an erosion control plan that would be implemented as needed. Therefore, no new significant adverse impacts related to flooding would occur.</p> <p>The landfill is not located near a levee or dam. No flooding hazards due to a failure of a levee or dam would occur with implementation of the proposed project. In addition, the landfill is not located near coastal or littoral systems. No hazards from inundation by seiche, tsunami or mudflow would occur with implementation of the proposed project.</p> <p>e. <u>Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</u></p> <p>As discussed above, the landfill operates under state and federal regulations, including, but not limited to, CCR Title 27, Division 2, and 40 CFR 258 (in accordance with State Water Resources Control Board Resolution 93-62). A Monitoring and Reporting Plan (M&RP) exists for the current and proposed water quality monitoring and response program for the landfill (as Appendix M of the JTD). The M&RP approved by RWQCB would describe required groundwater, leachate, surface water and vadose zone monitoring requirements for the project site. Groundwater monitoring has been ongoing at the landfill and has been performed in accordance with the landfill’s WDRs issued by RWQCB. As such, the proposed project would continue with the existing programs and would comply with the state and federal regulations. In addition, implementation of the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. Given this, implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.</p> <p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p> <p>Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:</p>					

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W-1	Drainage structures, such as the perimeter drainage channels, sedimentation basins, leachate evaporation ponds, stormwater retention basins, and collection pipes and ditches, shall be inspected and maintained on a regular basis.				
W-2	Regular monitoring (and possibly testing) of perimeter drainage channels and retention ponds shall be completed to assure that discharged stormwater does not contain contaminants from the landfill.				
W-3	A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared. It shall include a Spill Prevention and Response Plan and a monitoring plan. The facility shall implement "best management practices" as required by NPDES.				
W-4	Leachate shall be collected by the leachate collection and removal system (LCRS) installed at the base of each landfill cell. Such leachate shall be sampled regularly and, if necessary, treated prior to use for dust control on lined areas of the landfill.				
W-5	Stormwater runoff that falls on the active working face of the landfill shall be diverted to a collection sump and reused for dust control on lined areas of the landfill. The sump for stormwater runoff from the active working face shall be designed to hold the runoff from the 100-year, 24-hour storm.				
W-6	Drainage improvements shall be designed and constructed to provide all-weather access to the landfill.				
W-7	<p>To reduce the quantity of water used, the following measures shall be implemented:</p> <ul style="list-style-type: none"> • Low-flow plumbing fixtures shall be installed for onsite facilities. • Washwater for cleaning equipment at the operations and maintenance center shall be collected and recycled, and reused for washing or dust control. • Stormwater that falls on the active working face of the landfill shall be collected and used for dust control. 				
W-8	<p>The liner system for the expansion of El Sobrante shall meet the following requirements:</p> <ul style="list-style-type: none"> • The liner system (inclusive of the bottom liner and the sideslope liner) of the landfill shall exceed the requirements of Subtitle D and California Code of Regulations (CCR) Title 27 and shall be composed of the alternative bottom liner (identified as Alternative Bottom Liner B2) and the alternative sideslope liner (identified as Sideslope Liner Alternative S2), which are both described and evaluated in Evaluation of Liner System Alternatives, El Sobrante Landfill Expansion, Riverside County, California, prepared by GeoSyntec Consultants and dated February 1998. 				

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<ul style="list-style-type: none"> If it is determined that this liner system will not meet the requirements of the regulatory agencies, a substitute liner system must be approved by the regulatory agencies, and evidence of such a determination shall be forwarded to the El Sobrante Landfill Administrative Review Committee of Riverside County. In this event, the substitute liner system shall be composed of a bottom liner and a sideslope liner that are at least equal to Alternative Bottom Liner B2 and Sideslope Liner Alternative S2, respectively, and must be approved by the Administrative Review Committee. 					
W-9	Landfill gas collectors shall be placed as compacted lifts of waste are finished. Once sufficient waste has been placed above the collectors to prevent air intrusion, the collectors shall be used for active landfill gas extraction.				
W-10	The final cover of the landfill shall conform to Subtitle D and CCR Title 27, and shall consist of a minimum of four (4) feet of vegetative layer in accordance with the augmented cover described in the EIR (State Clearinghouse No. 90020076). Any change from the augmented cover shall require clearance from the RCDWR, the California Integrated Waste Management Board (CALRECYCLE), Regional Water Quality Control Board (RWQCB), the U.S. Fish and Wildlife Service (USFWS), and the California Department of Fish and Game (CDFW).				
W-11	In accordance with applicable regulations, landfill gas shall be monitored at the landfill perimeter and in the vadose zone.				
W-12	"Point of compliance" ground water monitoring wells, as required by CCR Title 27, shall be installed along the downgradient perimeter of the landfill footprint, pursuant to a monitoring plan approved by the RWQCB. These wells shall be sampled on a quarterly basis beginning one year prior to landfilling each respective cell, and will provide a secondary warning of a leak in the liner system.				
W-13	If leachate or landfill gas generated by the landfill expansion were determined to be a potential risk to ground water, a corrective action plan shall be developed and implemented in conjunction with the RWQCB as required by CCR Title 27.				
W-14	Whenever a specified material, design, system or action is required by the project or any exhibit thereto, USA Waste or its successor-in-interest may substitute such material, design, system or action, provided that: Such material, design, system or action complies with applicable Federal, State, and local regulations; and, Any Federal, State or local regulatory agency having jurisdiction has approved the use of the material, design, system or action for				

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<p>similar facilities (i.e., Class III landfills); and, The General Manager - Chief Engineer of the RCDWR, with concurrence of the appropriate regulatory agency(ies), has determined that such material, design, system or action is technically equal, or superior to, those required in these conditions.</p> <p>W-15 USA Waste or its successor-in-interest shall deposit 50 cents per ton into a Third Party, Environmental Impairment Trust, which fund shall be established and maintained throughout the life of the project. Any balance in the existing fund contributed by USA Waste or its successor-in-interest under the First El Sobrante Landfill Agreement, as amended, shall continue to accrue with deposits from all waste delivered to the site on or after the start date, including interest earnings on the funds, until the fund has reached a total of \$2,000,000, at which time deposits may be discontinued until withdrawals cause the fund to fall below the \$2,000,000 cap. The cap shall increase annually by 90 percent of the change in the Consumer Price Index (CPI) starting in the year 2002.</p> <p>W-16 Monies may be withdrawn from the Environmental Impairment Trust only for environmental remediation purposes with approval by USA Waste or its successor-in-interest and the General Manager - Chief Engineer of the RCDWR. The Trustee shall be required to report quarterly to the Department on all fund activity and balances.</p>					

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11. Land Use and Planning. Would the project:					
a. Physically divide an established community?	1998 EIR, § 4.4; 2009 SEIR, Appendix A, § 1	No	No	No	No
b. Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	1998 EIR, § 4.4; 2009 SEIR, Appendix A, § 1	No	No	No	No
<p><u>Environmental Setting/Discussion</u></p> <p>a. <u>Physically divide an established community?</u></p> <p>The proposed project involves construction and operation of a RNG Facility within an existing landfill with no established community on the site. Therefore, the proposed project would not disrupt or divide the physical arrangement of an established community. No additional analysis is required.</p> <p>b. <u>Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?</u></p> <p>The proposed project will be constructed within the existing landfill which is consistent with the Riverside County General Plan land use designation for the project site, which designates the landfill as a “Public Facility.” The existing landfill’s impact upon land use and zoning was evaluated in the 1998 EIR, and the project actions simply implement the existing general plan and zoning, and no changes to land-use or zoning are needed; therefore, no additional environmental analysis of this topic is required. All mitigation measures relating to Land Use and Zoning as proscribed in the previous EIR will remain in effect.</p>					

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<p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p> <p>Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:</p> <p>L-1 The development of El Sobrante Landfill Expansion shall be in accordance with the mandatory requirements of all applicable County ordinances and shall conform substantially with the project description in the EIR (State Clearinghouse No. 90020076), as filed in the office of the RCDWR.</p> <p>L-2 Prior to any offsite grading, USA Waste or its successor-in-interest shall obtain and record appropriate offsite easements.</p> <p>L-3 A Citizen Oversight Committee shall be formed by the Board of Supervisors upon approval of the project. The Citizen Oversight Committee shall be composed of a total of five (5) members, whose term of service will be established upon formation of the committee. Three (3) of the five (5) members will be appointed by the Supervisor of the district in which the landfill is located. Of these three (3), two (2) members must reside within a three (3) mile radius of the landfill property. One (1) member shall be a representative from a corporate operation within a three (3) mile radius of the landfill property. The remaining two (2) members will be appointed by the entire Board of Supervisors and shall be chosen at large to represent the affected communities of interest.</p> <p>L-4 The Citizen Oversight Committee shall meet at least once annually to review the Annual Status Reports that will be submitted by an Administrative Review Committee which will include all reports and data that will be provided by USA Waste or its successor-in-interest and shall submit written comments on the project to the Board of Supervisors as they deem necessary.</p>					

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12. Mineral Resources. Would the project:					
a. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	1998 EIR, Appendix A, § 50, pp. A.1-39 and A.1-40; 2009 SEIR, Appendix A, § 8	No	No	No	No
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	1998 EIR, Appendix A, § 50, pp. A.1-39 and A.1-40; 2009 SEIR, Appendix A, § 8	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p><u>Environmental Setting/Discussion</u></p> <p>a. <u>Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</u> b. <u>Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?</u></p> <p>According to the Riverside County General Plan, Figure OS-6 (Mineral Resources Zone), the project site is located in Mineral Resource Zone 3 (MRZ-3). This designation signifies that mineral deposits are likely to exist and the significance of the deposit is undetermined. However, no known mineral deposits are located on the landfill site, and it is not identified on local plans or state plans as a mineral recovery area. Therefore, as concluded in the previous EIRs, the proposed project would not result in the loss of availability of a known mineral resource in an area classified or designated by the State that would be of value to the region or the residents of the State. The proposed project will not result in any impacts related to mineral resources. No additional analysis is required.</p> <p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p> <p>There are no mitigation measures, conditions of approval, or regulatory requirements related to this environmental factor.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
13. Noise. Would the project result in:					
a. 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, or applicable standards of other agencies?	1998 EIR § 4.7; 2009 SEIR, § 4.3	No	No	No	No
b. Generation of excessive groundborne vibration or groundborne noise levels?	1998 EIR § 4.7; 2009 SEIR, § 4.3	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
c. For a project within the vicinity of a private airstrip or on airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	1998 EIR. Appendix A, § 31	No	No	No	No

Environmental Setting/Discussion

The discussion below is based on Noise and Vibration Study (TAHA 2024c) (Appendix I of this Addendum) prepared for the proposed project.

- a. Generation of a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Noise impacts associated with the El Sobrante Landfill were analyzed as part of the 1998 EIR, the 2009 SEIR, and the 2018 Addendum. As discussed in the 2009 SEIR and 2018 Addendum, the project site emits noise levels of approximately 40.0 A-weighted decibel (dBA), Equivalent Noise Level (L_{eq}) at the nearest sensitive receptors², which when combined with existing ambient noise levels of 47.9 dBA, L_{eq} would result in exterior noise levels of approximately 48.6 dBA, L_{eq}. The landfill’s contribution of 0.7 dBA is considered less than “barely perceptible” and the overall noise levels are well below the County of Riverside’s 65 dBA, L_{eq} exterior standard. This analysis considers the

² The nearest noise sensitive uses to the project site are single-family homes located approximately 1,500 feet to the northwest of the proposed Gas POR Site and a Riverside County Habitat Conservation Area located to the west of the North RNG Site.

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>potential for new construction and operational activities to result in increased noise levels relative to what was disclosed in the 1998 EIR, the 2009 SEIR, and the 2018 Addendum.</p> <p><u>Construction</u> The temporary construction activities associated with the proposed project would be conducted within the existing landfill and is located over 1,500 feet from the nearest sensitive receptors. Construction activities will include grading, trenching, directional drilling, import of construction materials, soil compaction, equipment installations, and building construction. Typical noise levels from major construction equipment that would be used during construction are listed in Table 4 in Appendix I of this Addendum. The loudest piece of equipment would be a paving machine, which has a noise level of 82.5 dBA, L_{eq} at 50 feet. At 1,500 feet, the noise level would be approximately 53.0 dBA, L_{eq}. As the 24-hour CNEL noise level is calculated by averaging the 24 individual hourly noise levels (with sensitivity weighting applied for evening and nighttime hours) there is no potential for this non-continuous 53.0 dBA, L_{eq} noise level to increase the existing 24-hour noise level. Construction staging and stockpile areas would remain within the project site or would be disposed of at the El Sobrante Landfill. Construction activities would still maintain 1,500 feet or more of separation from the nearest sensitive receptors and would not result in an increase of existing ambient noise levels. Therefore, construction of the proposed project would not include activities that would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.</p> <p><u>Operations</u> Implementation of the proposed project would require up to seven additional full-time employees, up to three additional part-time employees, and one truck trip per week for regular deliveries of materials. Additionally, vehicle trips would be required for maintenance, but would be infrequent (seven vehicle trips spanning up to 10 calendar days out of a year). Caltrans has stated that a doubling of traffic volumes on a roadway segment is typically needed to audibly increase traffic noise.³ The new vehicle trips would have no potential to double existing traffic volumes. Thus, the proposed project would not substantially increase vehicle trips and roadway noise would remain similar to existing conditions.</p> <p>Operations of the RNG Facility would include the processing of up to 15,000 SCFM of LFG and include possible noise generating equipment such as gas compressors, condensers, and blowers. WM has conducted noise studies for an 8,000-SCFM facility that would be approximately</p>					

³ Caltrans, *Technical Noise Supplement*, page 6-5, September 2013.

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
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the size of each RNG site. Thus, the approximate noise level used for this analysis is 89.0 dBA at 50 feet at each RNG site. The nearest sensitive receptor located to the southeast would be approximately 3,600 feet from the South RNG Site and 5,300 feet from the North RNG Site. The noise level at the nearest sensitive receptor noise generated by the combination of the two RNG facilities would be approximately 53.5 dBA, L_{eq} which when combined with the ambient noise level is 55.9 dBA, L_{eq} . Conservatively, this does not account for attenuation provided by topography and intervening structures, which would further reduce noise levels. Without accounting for topography the overall noise level would remain below the County of Riverside exterior noise standard of 65 dBA, L_{eq} . The sensitive receptors have their line of sight to the RNG Facility obstructed by rolling hills that reach up to 500 feet higher from the canyon floor. Due to topography, operational noise levels are reduced by topography acting as a natural noise barrier. Additionally, the North RNG Site would be bordered by 12-foot-high fencing with sound-attenuating drapes on the inside of the fence that would further reduce noise levels. Therefore, implementation of the proposed project would not include activities that would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.

The North RNG Site is located at the boundary of the landfill where undeveloped land to the west and north is associated with the Riverside County Habitat Conservation Area. While noise from operation of the North RNG Site would likely be perceptible to wildlife that are in close proximity to this location, existing landfill-related operations presently include vehicular traffic (haul trucks) and associated human presence. Wildlife in close proximity would thus likely be accustomed to existing landfill-related noise and activity (or avoid the zones near the perimeter of the landfill due to the existing noise generated by the landfill).

b. Generation of excessive groundborne vibration or groundborne noise levels?

Ground-borne vibration and ground-borne noise impacts associated with the El Sobrante Landfill were analyzed as part of the 1998 EIR, the 2009 SEIR, and the 2018 Addendum. This analysis considers the potential for new construction and operational activities to result in increased in ground-borne vibration or ground-borne noise levels relative to what was disclosed in the 1998 EIR, the 2009 SEIR, and the 2018 Addendum.

Construction Vibration

Operation of heavy equipment can generate varying degrees of vibration, depending on the procedure and equipment. Typical vibration levels associated with construction equipment are provided in Table 5 in Appendix I of this Addendum. Heavy equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a

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<p>construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, and to slight damage at the highest levels. In most cases, the primary concern regarding construction vibration relates to damage.</p> <p>Construction of the proposed project would require trenching to install underground piping. Trenching activity would be most typically represented by excavators. Excavators generate a vibration level of approximately 0.040 inches per second at 25 feet. Structures associated with sensitive receptors nearest to the trenching zones would be at least 1,500 feet away, and no sensitive buildings, such as recording studios and medical facilities, were identified in the area. At a distance of 1,500 feet, vibration generating equipment would generate vibration levels below the vibration damage threshold of 0.2 inches per second for non-engineered timber and masonry buildings. Therefore, the proposed project would result in a less-than-significant impact related to structure damage from construction vibration.</p> <p><u>Operational Vibration</u> The RNG facilities would not include significant vibration-generating equipment and, therefore, would not result in exposure of sensitive receptors to increased vibration. Therefore, the proposed project would result in a less-than-significant impact related to off-site roadway vibration</p> <p>c. <u>For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</u></p> <p>The proposed project would be located within the same landfill footprint as described in the 1998 EIR, 2009 SEIR, and 2018 Addendum. There are no existing or planned private airstrips or airports within the vicinity of the project site. The nearest airport to the project site is the Corona Municipal Airport, which is located approximately 10 miles to the northwest. Thus, the proposed project would not be affected by airport noise and no impact related to airport or airstrip noise would occur.</p> <p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p> <p>Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:</p>					
N-1	<p>Excavation and liner construction of new landfill cells shall be limited to the hours of 7:00 a.m. to 10:00 p.m., Monday through Saturday, with the following restrictions: a) the conveyor belt system shall not be located less than 295 feet from occupied residences; and b) excavation and liner construction of new cells within 10 feet of the top of slope will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday.</p>				
N-2	<p>Landfill equipment working on the outside slopes of the landfill shall be limited to the hours of 8:00 a.m. to 5:00 p.m.</p>				
N-3	<p>Construction equipment shall use industrial-grade mufflers to reduce noise emission.</p>				
N-4	<p>Blasting shall be postponed during temperature inversions and unfavorable wind conditions (wind blowing toward residences).</p>				
N-5	<p>Drilling and blasting shall be conducted between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday, and will not occur on federal, state, and local holidays.</p>				
N-6	<p>Acoustic blankets shall be used around drilling operations to reduce potential drilling noise.</p>				
N-7	<p>Wherever feasible, temporary earthen or landscape berms, or other structures or measures, shall be utilized to reduce potential noise impacts on surrounding homeowners from nighttime activities at the working face of El Sobrante. Any measures implemented for this purpose shall be subject to annual review by the Citizen Oversight Committee.</p>				

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
14. Population and Housing. Would the project:					
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	1998 EIR, § 6.1; 2009 SEIR, Appendix A, § 2	No	No	No	No
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	1998 EIR, Appendix A, § 17; 2009 SEIR, Appendix A, § 2	No	No	No	No
<u>Environmental Setting/Discussion</u>					
a. <u>Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</u>					

The proposed project consists of installation of a RNG Facility at the landfill which would not result in a change to existing landfill operations. Construction of the proposed project would require a crew of approximately 6 to 12 construction workers (daily) over an approximately 18-month period. It is anticipated that construction workers would come from local labor pools. The proposed project would require ongoing operation and maintenance employees and is expected to hire seven full-time employees and potentially three additional part-time employees. It is also anticipated that the jobs generated from the project operation would be filled by the local labor pool. It is unlikely that the employees would relocate from other regions for the proposed project. Therefore, implementation of the proposed project would not directly or indirectly induce substantial unplanned population growth in the area. No additional analysis is required.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project site is an existing landfill with no established community of the site. The proposed project consists of installation of an RNG Facility at the landfill which would not displace existing people or housing, necessitating the construction of replacement housing elsewhere. No additional analysis is required.

Mitigation Measures, Conditions of Approval or Regulatory Requirements

There are no mitigation measures, conditions of approval, or regulatory requirements related to this environmental factor.

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
15. Public Services. Would the project:					
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
Fire protection?	1998 EIR, § 4.11; 2009 SEIR, Appendix A, § 11	No	No	No	No
Police protection?	1998 EIR, § 4.11; 2009 SEIR, Appendix A, § 11	No	No	No	No
Schools?	1998 EIR, Appendix A, § 8; 2009 SEIR, Appendix A, § 11	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
Parks?	1998 EIR, Appendix A, § 12; 2009 SEIR, Appendix A, § 15	No	No	No	No
Other public facilities?	1998 EIR, Appendix A, § 10 and 11; 2009 SEIR, Appendix A, § 11	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<u>Environmental Setting/Discussion</u>					
<p>a. <u>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</u></p> <ul style="list-style-type: none"> ○ <u>Fire protection?</u> ○ <u>Police protection?</u> ○ <u>Schools?</u> ○ <u>Parks?</u> ○ <u>Other public facilities?</u> <p>The 1998 EIR addressed potential impacts associated with public services and found that the landfill expansion would not result in significant impacts with respect to the incremental increase in demand for fire and police protection, and would not result in any additional need for, schools, parks, or other public facilities. The proposed project consists of installation of a RNG Facility at the landfill which would not result in a change to existing landfill operations and would not generate population growth that would place new demands on local public service providers. As such, implementation of the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities. Therefore, the proposed project would have no impact associated with any public services. No additional analysis is required.</p> <p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p> <p>There are no mitigation measures, conditions of approval, or regulatory requirements related to this environmental factor.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
16. Recreation.					
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	1998 EIR, Appendix A, § 12; 2009 SEIR, Appendix A, § 15	No	No	No	No
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	1998 EIR, Appendix A, § 12; 2009 SEIR, Appendix A, § 15	No	No	No	No

Environmental Setting/Discussion

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The 1998 EIR addressed potential impacts associated with park and recreation resources and found that the landfill expansion would not affect or result in an indirect need for new or altered existing park or other recreational facilities and that no impact upon the quality or quantity of existing recreational opportunities would occur. The proposed project consists of installation of a RNG Facility at the landfill which would not result in a change to existing landfill operations and would not result in population growth that would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. In addition, the proposed project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, the proposed project would have no impact associated with parks and recreation. No additional analysis is required.

Mitigation Measures, Conditions of Approval or Regulatory Requirements

There are no mitigation measures, conditions of approval, or regulatory requirements related to this environmental factor.

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
17. Transportation. Would the project:					
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	1998 EIR § 4.5; 2009 SEIR, § 4.5	No	No	No	No
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	1998 EIR § 4.5; 2009 SEIR, § 4.5	No	No	No	No
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	1998 EIR § 4.5; 2009 SEIR, § 4.5	No	No	No	No
d. Result in inadequate emergency access?	1998 EIR § 4.5; 2009 SEIR, § 4.5	No	No	No	No

Environmental Setting/Discussiona. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Traffic impacts associated with the El Sobrante Landfill were analyzed as part of the 1998 EIR and the 2009 SEIR. The proposed project consists of installing and operating the RNG Facility at the existing El Sobrante Landfill within three previously disturbed areas. The proposed project does not propose any changes to landfill operations and the maximum number of vehicle trips currently permitted on a daily basis (i.e., 1,305 one-way vehicle trips) would not be changed. The construction activities associated with the proposed project would be temporary (approximately 18 months) and would not require temporary access roads. The operation of the proposed project would require seven full-time employees and three part-time employees. Two service vehicles for 10 days per year; one delivery vehicle per week; and five maintenance vehicles for seven days per year are estimated for the project operation. At a worst-case scenario, there would be a total of 18 daily one-way trips, which represents only 1 percent of the daily activity (1,305 one-way vehicle trips) at the landfill. The project-related vehicle trips would be staggered throughout the day (rather than have the potential to occur all at once, such as during peak hour traffic) and traffic associated with service and maintenance vehicles would occur on an intermittent basis to not exceed the currently permitted daily vehicle trips of 1,305 one-way vehicle trips. The designated construction route to and from the work areas would be the existing access road, Dawson Canyon Road east from Temescal Canyon Road. A temporary lane closure would occur but no road closure and/or detour would be required. As such, the proposed project would not significantly change or modify any of the existing public transit, roadway, bicycle and pedestrian facilities or make any modification that could conflict with adopted policies, plans or programs or modify the safety of such facilities. Therefore, implementation of the proposed project would not result in conflicts with applicable plans, ordinances, or policies related to the performance of the circulation system or with applicable congestion management programming. No additional analysis is required.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

The County's Transportation Analysis Guidelines include screening criteria for certain development projects that could lead to a less than significant impact and would not need additional vehicle miles traveled (VMT) analysis. The screening criteria includes:

- Small Projects: This applies to projects with low trip generation per existing CEQA exemptions or based on the County Greenhouse Gas Emissions Screening Tables, result in a 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO_{2e}) per year screening level thresholds.
- Projects Near High Quality Transit: High quality transit provides a viable option for many to replace automobile trips with transit trips resulting in an overall reduction in VMT.
- Local-Serving Retail: The introduction of new Local-serving retail has been determined to reduce VMT by shortening trips that will occur.
- Affordable Housing: Lower-income residents make fewer trips on average, resulting in a lower VMT overall.
- Local Essential Service: As with Local-Serving Retail, the introduction of new Local Essential Services shortens non-discretionary

trips by putting those goods and services closer to residents, resulting in an overall reduction in VMT.

- **Map-Based Screening:** This method eliminates the need for complex analyses, by allowing existing VMT data to serve as a basis for the screening smaller developments. Note that screening is limited to residential and office projects.
- **Redevelopment Projects:** Projects with lower VMT than existing on-site uses, can under limited circumstances, be presumed to have a non-significant impact. In the event this screening does not apply, projects should be analyzed as though there is no existing uses on site (project analysis cannot take credit for existing VMT).

The proposed project would require a crew of approximately 6 to 12 construction workers (daily) during construction. As previously stated, the operation of the proposed project would require seven full-time employees and three part-time employees. Two service vehicles for 10 days per year; one delivery vehicle per week; and five maintenance vehicles for seven days per year are estimated for the project operation. At a worst-case scenario, there would be a total of 18 daily one-way trips. As such, the proposed project would qualify for the small project screening criteria. Therefore, implementation of the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b). Impacts would be less than significant and no mitigation is required.

- c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

As discussed in the 2009 SEIR, roadway modification and traffic signal installation requirements were implemented to improve several surrounding roadways and intersections to the County of Riverside Transportation and Land Management Department standards. The proposed project does not include modifications to existing roadways and the maximum number of vehicle trips currently permitted on a daily basis (i.e., 1,305 one-way vehicle trips) would not be changed. The proposed project would require two outside service vehicles for approximately 10 days per year and one delivery truck per week. Therefore, because no additional physical improvements to surrounding roadways are proposed or necessary, and because the proposed project would not substantially increase vehicular trips on surrounding roadways, the proposed project would not result in hazards to safety from design features or incompatible uses and significant impacts would not occur. No additional analysis is required.

- d. Result in inadequate emergency access?

As discussed in the 2009 SEIR, the El Sobrante Health and Safety Plan includes several options to provide access to the site during emergency situations. Implementation of the proposed project would not alter the emergency access routes and would not result in any changes to existing access to surrounding nearby uses. Therefore, implementation of the proposed project would not result in inadequate access to nearby uses, and impacts are evaluated as less than significant. No additional analysis is required.

Mitigation Measures, Conditions of Approval or Regulatory Requirements

Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:

- T-1 Out-of-County waste from Los Angeles County, Orange County, San Bernardino County, and San Diego County shall be transported to El Sobrante by transfer trucks.
- T-2 Transportation of out-of-County waste from areas other than Los Angeles County, Orange County, San Bernardino County, and San Diego County shall not be permitted without additional environmental review and approval.
- T-3 Transfer trucks hauling waste from out-of-County to El Sobrante that use State Route (SR) 91 shall travel to and from the landfill during off-peak hours for SR 91.
- T-4 Vehicles delivering waste from out-of-County to be disposed at El Sobrante shall utilize on all trips (both inbound and outbound) only that portion of Temescal Canyon Road between its intersection with I-15 and the landfill access road, except in the event of a closure of the on- and/or offramps at Temescal Canyon Road and I-15.
- T-5 Except for vehicles collecting waste in the immediate vicinity of El Sobrante, USA Waste's or successor's-in-interest collection vehicles delivering waste from in- County to be disposed at El Sobrante shall utilize only that portion of Temescal Canyon Road between its intersection with I-15 and the landfill access road for all trips (both inbound and outbound), except in the event of a closure of the on-and/or off-ramps at Temescal Canyon Road and I-15.

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
18. Tribal Cultural Resources.					
a. Would the project cause a substantial adverse change in the significant of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					

<p>i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</p> <p>ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<p>2018 Addendum EIR, 19. Tribal Cultural Resources</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>
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Environmental Setting/Discussion

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Refer to Section 5. Cultural Resources and Section 7. Geology and Soils, of this Addendum, which discuss the archaeological and paleontological assessment completed as part of the 1998 EIR and the proposed project, respectively. They also discuss the mitigation measures stemming from these assessments that were incorporated into the 1998 EIR (and would continue to be enforced upon implementation of the proposed project) that have resulted in ongoing cultural resource surveying/monitoring. As mentioned previously, there are seven archaeological sites (CA-RIV-1143, CA-RIV-1144, CA-RIV-1146, CA-RIV-1148, CA-RIV-1651, CA-RIV-4307, and CA-RIV-4981) within the landfill site boundary, and one site (CA-RIV-1147) that is outside of, but immediately adjacent to, the landfill site boundary that are surveyed on a biannual basis. Based on the most recent results of archival research, the Native American outreach program, and the field survey, no new or previously recorded cultural resources were identified in the project area. However, an assessment of archaeological sensitivity indicates that the southern end of the project area, extending from the intersection of Temescal Canyon Road and Dawson Canyon Road, along Dawson Canyon Road until the road turns north and starts going uphill, exhibits moderate potential to encounter archaeological resources, based on proximity to previously recorded resources, natural setting, and presence of soils with potential for buried deposits. The proposed project would include excavation activities, which could have the potential to inadvertently uncover archaeological resources, tribal cultural resources, and unknown human remains. As such, the mitigation measures identified in the 1998 EIR to address cultural resources would continue to be enforced upon implementation of the proposed project, which would include the continuation of monitoring, testing, and/or preservation or data recovery excavation by certified archaeologists (if necessary) for future grading and other disturbance-related activities within and in close proximity to identified archaeological sites. No monitoring is recommended currently for construction activities where Dawson Canyon Road turns north and ascends northward upslope, because soils in this area exhibit more clear evidence of disturbance, they likely are older and less likely to contain archaeological resources, and the project area is not as close to previously recorded sites and sensitive landscape features, such as low slopes and freshwater resources.

The certified 1998 EIR/2009 SEIR for the El Sobrante Landfill, under which the proposed project is being conducted, were completed before establishment of AB 52 in 2015, and thus AB 52 would not apply to the proposed project. Though the proposed project would not be subject to AB 52, tribal input was sought as a best practice measure to address potential impacts on any potential cultural resources in the project area. Information concerning sacred lands in the project vicinity was solicited from the NAHC. An email was sent to the NAHC on

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>January 25, 2024, requesting a search of its SLF to identify tribal cultural resources (TCR) in the area. A response was received on February 22, 2024, indicating that the results of the SLF search were positive and the Pechanga Band of Indians (Tribe) should be contacted for more information. The NAHC also provided a list of tribal contacts that are affiliated culturally with the project area. The contact list is provided in Appendix D of this Addendum.</p> <p>On May 3, 2024, AECOM sent an e-mail request to the Tribe for any insights or knowledge that they may wish to share regarding tribal history of the area and potential impacts on cultural resources in the project area. The letter included a description of the project location and undertaking, a summary of the ongoing archival research, and a map of the project area. The letter indicated that any information provided by the tribe would be included in the cultural resources assessment being conducted for the project, and would be submitted to the lead agency. A follow-up phone call was placed on May 17, 2024, and a voicemail message was left, detailing the purposed of the call and contact information if anyone wished to discuss the project. No response has been received to date. Copies of the NAHC communications and contact letter are provided in Appendix D of this Addendum.</p> <p>As part of the 2018 Addendum, the RCDWR provided notification of the 2018 project and solicited information regarding TCRs to eight local Native American Tribes, with only the Tribe responding. RCDWR and WM staff met with the Tribe and there were no new TCRs identified within the 2018 project site. While the 2018 project would not impact known TCRs, at the request of the Tribe, existing cultural resources-related mitigation measures, identified in Sections 5 and 7 of this Addendum, were modified to more specifically reflect conditions involving the accidental discovery or recognition of human remains, and new mitigation measures (TR-1 through TR-3, below) were added to specifically identify the Tribe for Native American monitoring and ownership of previously considered discovery of any unanticipated cultural resources.</p>					

Accordingly, with the continued enforcement of mitigation measures associated with cultural resources, no substantial changes to the circumstances under which the proposed project would be undertaken regarding the proposed project's potential impacts to TCRs would occur. Thus, the prior environmental documentation for the proposed project adequately addresses the proposed project's impact to archeological resources, historical resources, paleontological resources, and human remains. As such, no new impacts to TCRs would occur and no additional analysis of this issue is warranted.

Mitigation Measures, Conditions of Approval or Regulatory Requirements

Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:

TR-1 Prior to impacts within the Phase 17 area, USA Waste of California, Inc. shall enter into an agreement with the Pechanga Band of Mission Indians for Native American monitoring. The Native American Monitor shall be on-site during all initial ground disturbing activities within Phase 17 including clearing, grubbing, tree removal, grading and trenching. The Native American Monitor shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.

TR-2 If during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed:

All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and USA Waste of California, Inc. shall call the County Archaeologist, or qualified archaeologist (if the County Archaeologist position is vacant), immediately upon discovery of the cultural resource. A meeting shall be convened between USA Waste of California, Inc., Riverside County Department of Waste Resources, the County Archaeologist, and the Pechanga Band of Mission Indians, to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished. USA Waste of California, Inc. is responsible for all costs associated with the disposition of cultural resources (curation, re-burial, etc.).

TR-3 USA Waste of California, Inc. shall relinquish ownership of all cultural resources, including sacred items, burial goods, and Human Remains after these items have been released by the County Coroner, and provide evidence to the satisfaction of the County Archaeologist that all archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), have been handled through one of the following methods:

1. A fully executed reburial agreement with the appropriate culturally affiliated Native American tribe or band. This shall include

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<p>measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloging, analysis and special studies have been completed on the cultural resource(s).</p> <ol style="list-style-type: none"> 2. Curation at a Riverside County Curation facility that meets federal standards per 36 Code of Federal Regulations (CFR) Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers and tribal members for further study. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid. 3. If more than one Native American Group is involved with the project and cannot come to an agreement between themselves as to the disposition of cultural resources, USA Waste of California, Inc. shall then proceed with curation at the Western Science Center. 4. USA Waste of California, Inc. is responsible for all costs associated with the disposition of cultural resources (curation, reburial, etc.). 					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
19. Utilities and Service Systems. Would the project:					
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	1998 EIR § 4.11	No	No	No	No
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	1998 EIR § 4.11	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	1998 EIR § 4.11	No	No	No	No
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	1998 EIR § 4.11	No	No	No	No
g. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	1998 EIR § 4.11	No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<u>Environmental Setting/Discussion</u>					
<p>a. <u>Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</u></p> <p>b. <u>Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?</u></p> <p>c. <u>Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</u></p>					
<p>The 1998 EIR addressed potential impacts associated with utilities and service systems and found that the landfill expansion would not result in significant impacts with respect to the incremental increase in demand for potable water supply, wastewater treatment, electrical service, or natural gas service. The proposed project would not result in a change to existing landfill operations. The operation of the proposed project would require seven full-time employees and three part-time employees, and therefore would not result in a substantial increase in demand for utilities and service systems over existing baseline levels. Therefore, the proposed project would have a less than significant impact associated with utilities and service systems. The proposed RNG Sites would not receive or process any leachate from the landfill. Condensate that is generated through gas compression during the RNG process will not be substantial (less than 20 gallons per minute). As previously stated, condensate generated from the RNG facility would be treated on-site at the South RNG Site with DFRO process equipment. Any permeate generated from this process that meets industrial waste requirements would be sent to the Temescal Valley Water District sanitary system. Solids would be trucked off to a facility that is permitted to accept the solids. Impacts would be less than significant, and no additional analysis is required.</p>					
<p>d. <u>Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?</u></p> <p>e. <u>Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</u></p>					
<p>The proposed project would generate solid waste during construction primarily in the forms of demolition debris and excavated soil. All demolition debris and excess soil from the construction would stay within the landfill. The landfill is intended to meet existing and future needs for municipal solid waste disposal, while complying with federal, State, and local statutes and regulations related to solid waste.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p>Impacts would be less than significant, and no additional analysis is required.</p> <p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u></p> <p>Mitigation measures listed in the MMP for the El Sobrante Landfill Expansion Project will continue to be enforced upon implementation of the proposed project, if they are still applicable. The mitigation measures in the MMP related to this environmental factor consist of the following:</p> <p>U-11 Installation of low flow toilets, faucets, and showers.</p> <p>U-12 Wastewater shall go to the Lee Lake Treatment Facility, which makes water available for reuse.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
20. Wildfire. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	N/A	N/A	N/A	N/A	N/A
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	N/A	N/A	N/A	N/A	N/A

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	N/A	N/A	N/A	N/A	N/A
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	N/A	N/A	N/A	N/A	N/A

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
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Environmental Setting/Discussion

Wildfire, as a stand-alone environmental topic with specific environmental issue questions, was not part of the Appendix G Guidelines and therefore was not addressed in either the 1998 or 2009 EIRs. Although the stand-alone wildfire topic was not part of the Appendix G Guidelines for the previous EIRs, the updated checklist is used here to provide the most up-to-date information.

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The proposed project is located within a state responsibility area classified as Very High Fire Hazard Severity Zone (CALFIRE, 2024). As discussed in the 1998 EIR, the El Sobrante Landfill would not substantially impair an adopted emergency response plan or emergency evacuation plan as the project site is located in a remote area within the El Sobrante Landfill property boundary. The project site will be accessed from the existing paved roads (Dawson Canyon Road and Temescal Canyon Road) and would not require complete road closures (lane closure only) or detours during the construction of the proposed project. Following the construction, daily operations at the project site would remain the same. As discussed in the 2009 SEIR, the El Sobrante Landfill Health and Safety Plan and Emergency Response Plan would continue to address emergency issues and protocol in the event that an emergency situation occurs. Furthermore, the proposed project would be subject to adopted federal, State, and local development guidelines such as California Fire Code and the Riverside County Ordinance No. 787 and No. 659, that govern wildfire, emergency services, and emergency access.

As stated previously, the Gas POR Site is located south of CCW and west of Temescal Canyon Wash, and is in a FEMA SFHA Zone AE. As such, the proposed project, specifically the Gas POR Site, has been designed to not encroach into CCW defined slopes that designate the existing floodway. The proposed project design would maintain a finished floor and equipment elevation of 933 feet minimum, which is one foot above the effective BFE of 932 feet. Although this elevation is appropriate to minimize flood hazard risk based on the effective Flood Insurance Rate

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<p>Map, it is also conservative considering the existing conditions and likely future development. Updated flood models based on existing topography and Dawson Canyon Road Bridge geometry show that the one percent annual chance flood is contained within the Temescal Wash main channel in the vicinity of the project site. Localized flooding on the project site due to CCW would be insignificant, as flood water would seek Temescal Wash through lower lying areas relative to the proposed project. In addition, potential lateral erosion along the north edge of the Gas POR Site in CCW would be monitored as part of an erosion control plan that would be implemented as needed.</p> <p><u>Mitigation Measures, Conditions of Approval or Regulatory Requirements</u> There are no mitigation measures, conditions of approval, or regulatory requirements related to this environmental factor.</p>					

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
21. Mandatory Findings of Significance.					
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		No	No	No	No
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		No	No	No	No

Environmental Factor	Where Impact Was Analyzed in Prior Environmental Documents.	Do the Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Any Previously Infeasible or New Mitigation Measures to Address Impacts, but Would not be Implemented?
<p><u>Environmental Setting/Discussion</u></p> <p>a. <u>Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</u></p> <p>b. <u>Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</u></p> <p>c. <u>Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</u></p> <p>With implementation of the applicable mitigation measures from the 1998 and 2009 EIRs (listed in this document) and as supplemented herein with recommendations that are based on the present context and are consistent with and meet the intent of the existing, older mitigation measures, the proposed project would not exceed the scope of any impact contemplated in the prior environmental documents associated with habitat, species, historic/prehistoric resources, or adverse effects on human beings. Furthermore, cumulative impacts associated with the proposed project would not exceed those contemplated in the prior environmental documents, because no individual impact exceeds the scope of that same impact in those environmental documents.</p>					

4.0 Findings and Conclusions

The above evaluation and additional substantial evidence (e.g., appendices) support the conclusion that preparation of a supplemental or subsequent EIR is not required prior to approval of the proposed project, and that the Initial Study/Modified Environmental Checklist is adequate for the approval of the proposed project under CEQA.

There are no substantial changes proposed to the existing and historically realized levels of baseline operations at the El Sobrante Landfill, or in the operations of the proposed changes that require major revisions to the previously adopted 1998 EIR or 2009 SEIR, or preparation of a new subsequent EIR, due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. As illustrated herein, the proposed project is consistent with the 1998 EIR and 2009 SEIR, and would include only minor modifications to the landfill site. (State CEQA Guidelines, § 15162, subd. (a)(1).)

No new information of substantial importance or substantial changes in circumstances regarding the existing El Sobrante Landfill has occurred since the adoption of the 1998 EIR and 2009 SEIR. The previous analyses completed under CEQA remain adequate for purposes of the proposed project, as considered and supplemented herein by the Initial Study/Modified Environmental Checklist prepared pursuant to CEQA. (State CEQA Guidelines, §§ 15162, subd. (a)(2), (3).)

In addition, consideration of the proposed project would not result in a new significant adverse cumulative impact or a substantial increase in the severity of a previously identified cumulative impact. El Sobrante Landfill remains obligated to comply with all applicable mitigation measures in the MMP adopted as part of the 1998 EIR and 2009 SEIR by the County, and with all conditions of approval and applicable regulatory requirements.

5.0 Continued Implementation of Mitigation Measures and Regulatory Requirements

As required by Public Resources Code Section 21081.6 and State CEQA Guidelines Section 15097, mitigation measures have previously been adopted to avoid or substantially lessen the significant adverse impacts of the El Sobrante Landfill. Those mitigation measures and conditions of approval which were previously imposed and adopted, including those that are not relevant to the proposed project, would continue to be implemented. Long-term monitoring of mitigation measures would also continue to be implemented by the County of Riverside as the lead agency in accordance with the existing regulatory requirements.

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State Water Resources Control Board’s GeoTracker, 2024. Available at: [GeoTracker \(ca.gov\)](https://www.water.ca.gov/geo-tracker) (accessed April 2024).

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**COUNTY OF RIVERSIDE
DEPARTMENT OF WASTE RESOURCES
NOTICE OF DETERMINATION**

TO:

X Office of Planning and Research (OPR)
1400 Tenth Street
Room 121
Sacramento, CA 95814

X County Clerk
County of Riverside

For County Clerk's Use Only:

FROM:

Riverside County
Department of Waste Resources
14310 Frederick Street
Moreno Valley, CA 92553

SUBJECT: Filing of Notice of Determination in Compliance with Section 21152 of the Public Resources Code

Project Title: El Sobrante Landfill Renewable Natural Gas (RNG) Facility Project (Project)

State Clearinghouse (SCH) No.: 1990020076 & 2007081054 **Contact:** Kinika Hesterly **Phone:** 951-486-3283

Project Applicant/Property Owner & Address: USA Waste of California, Inc.
10910 Dawson Canyon Road, Corona, CA 92883-5020
Toro Energy of California
5900 Southwest Pkwy, Building 2, Suite 220, Austin, Texas 78735

Project Location: The facility is located in an unincorporated area of Riverside County at 10910 Dawson Canyon Rd, Temescal Valley, CA- east of Interstate 15, Temescal Canyon Road, south of Cajalco Road, and north of Dawson Canyon in western Riverside County (Portions of Sections 23, 24, 25, and 26, Township 4S, Range 6W and Portions of Section 19; Township 4S; Range 5W).

Project Description: The Project involves the construction and operation of a RNG Facility, in addition to the approval of the First Amendment to the First Amended and Restated Second El Sobrante Landfill Agreement, and the Revenue Sharing Agreement. Additional Project details are available in the Addendum to the EIR (2024).

This is to advise that the Riverside County Board of Supervisors has approved the above-referenced Project on November 5, 2024 and has made the following determinations regarding that Project:

1. The Project will not have a significant effect on the environment.
2. An Addendum to the El Sobrante Landfill EIRs (SCH No. 1990020076 & 2007081054) was prepared and certified for this Project pursuant to the provisions of the CEQA.
3. Existing mitigation measures were made a condition of the approval of this Project.
4. A new mitigation reporting or monitoring plan was not adopted for this Project.
5. A statement of Overriding Considerations was not adopted for this Project.
6. Findings were made pursuant to the provision of CEQA.

This is to certify that the documents which comprise the record of proceedings and approval for the Project, including the administrative record, Landfill EIRs and Addendum, are available to the general public at:
Riverside County Department of Waste Resources, 14310 Frederick Street, Moreno Valley, CA 92553

Signature: _____



Title: Principal Planner

Date: November 5, 2024

TO BE COMPLETED BY OPR

Date Received for Filing and
Posting at OPR: