Agromin-Limoneira Commercial Organics Processing Operation

Draft Environmental Impact Report
SCH# 2020039054

prepared by

County of Ventura
Resource Management Agency
800 South Victoria Avenue, L#1740
Ventura, California 93009
Contact: John Oquendo, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003

October 2021

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Environmental Scientists | Planners | Engineers
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Acronyms and Abbreviations

AB	Assembly Bill
AD	Anaerobic Digestion
AE	Agricultural Exclusive
AF	acre-feet
AM	ante meridiem (before midday)
APAC	Agricultural Policy Advisory Committee
APN	Assessor Parcel Number
BMP	Best Management Practices
BRC	BioResource Consultants, Incorporated
CalGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CASP	Covered Aerated Static Pile
CBC	California Building Code
CCR	California Code of Regulations
CEC	California Energy Commission
CERS	California Environmental Reporting System
CEQA	California Environmental Quality Act
CDFW	California Department of Fish and Wildlife
CH_4	methane
CHB	Cultural Heritage Board
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CNG	Compressed Natural Gas
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COVID-19	Coronavirus Disease 2019
CPUC	California Public Utilities Commission
CUP	Conditional Use Permit
DOC	Department of Conservation

DOGGR	Division of Oil, Gas and Geothermal Resources
EHD	Environmental Health Department
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas
GIS	Geographic Information Systems
GWh	Gigawatt hours
HMBP	Hazardous Materials Business Plan
HRR	Historic Resources Report
IS	Initial Study
ISAG	Initial Study Assessment Guidelines
LAFCo	Local Agency Formation Commission
LCA	Land Conservation Act
LEA	Lead Enforcement Agency
LOS	Level of Service
LLA	Lot Line Adjustment
LSAA	Lake and Streambed Alteration Agreement
MRF	Material Recovery Facility
MM	Mitigation Measure
MMBtu	Million therms
MRP	Mineral Resource Protection Overlay
MRZ	Mineral Resource Zone
MT	metric ton
MW	megawatt
NAHC	Native American Heritage Commission
NCZO	Non-Coastal Zoning Ordinance
NOD	Notice of Determination
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Preservation
OPR	Office of Planning and Research

OAW	Open Air Windrow
OIMP	Odor Impact Minimization Plan
OS	Open Space
OWTS	On-Site Wastewater Treatment Systems
PD	Planned Development
PM	post meridiem (after midday)
PMW	Parcel Map Waiver
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCR	Santa Clara River
SF	Square Feet
SOAR	Save Open Space and Agricultural Resources
SR	State Route
SWIS	Solid Waste Information System
SWRCB	State Water Resources Control Board
TDM	Transportation Demand Management
U.S.	United States
USDA	United States Department of Agriculture
U.S. EPA	United States Environmental Protection Agency
VCAPCD	Ventura County Air Pollution Control District
VCFPD	Ventura County Fire Protection District
VCTC	Ventura County Transportation Commission
Ventura LAFCo	Ventura Local Agency Formation Commission
VMT	vehicle miles traveled
WCF	Wireless Communication Facility
WDR	Waste Discharge Requirements

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Executive Summary

This Executive Summary is provided in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15123. It contains an overview of the programmatic analysis of the proposed Agromin-Limoneira Commercial Organics Processing Operation Project (hereafter referred to as the "proposed Project" or "Project"). As stated in CEQA Guidelines Section 15123(a), "[a]n [Environmental Impact Report (EIR)] shall contain a brief summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical." CEQA Guidelines Section 15123(b) states, "[t]he summary shall identify: (1) each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; (2) areas of controversy known to the Lead Agency, including issues raised by agencies and the public; and (3) issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects." Accordingly, this summary includes a brief synopsis of the Project and identified plan alternatives, environmental impacts and mitigation, areas of known controversy, and issues to be resolved during environmental review. Table ES-2 (at the end of this section) summarizes potential environmental impacts from implementation of the Project, mitigation measures that could reduce significant impacts, and the levels of significance following the implementation of mitigation measures.

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Project Location

The Project is located at the terminus of Edwards Ranch Road, south of State Route 126, approximately 5 miles southwest of the city of Santa Paula, in the unincorporated area of Ventura County. The Tax Assessor's Parcel Number (APN) for the parcel that constitutes the Project site area is 090-0-180-085. The parcel is part of a larger 994-acre lot. The site is located in an AE (Agricultural Exclusive) zone, with a General Plan Land Use designation of Agricultural (County of Ventura 2020). The proposed Project includes a Non-Coastal Zoning Ordinance (NCZO) Text Amendment as described in Section 2, *Project Description*.

Project Description

This EIR has been prepared to examine the potential environmental effects of the Agromin-Limoneira Commercial Organics Processing Operation Project. The following is a summary of the full Project description, which can be found in Section 2, *Project Description*.

The Project would transform the existing 15-acre agricultural composting operation into a 70-acre commercial composting facility with the ability to process and compost approximately 295,000 tons of organic material per year. The Project includes a Non-Coastal Zoning Ordinance (NCZO) Text Amendment also described in Section 2, *Project Description*.

Project Characteristics

The proposed Project includes a Conditional Use Permit (CUP) and NCZO Text Amendment to permit the expansion of an existing 15-acre agricultural organics processing facility to a new 70-acre commercial organics processing operation[1] that would process food and green material delivered to the site and package for sale mulch, compost, and wood chip materials. The expansion of the existing 15-acre agricultural organics processing operation to the proposed commercial organics processing facility would result in the removal of 55 acres of existing citrus orchard. Additionally, three propane-powered windmills would be removed as part of the orchard removal. Table ES-1 summarizes the general characteristics of the Project.

Buildings

As outlined in Table ES-1, there would be a total of six buildings with a total floor area of 230,779 square feet. These buildings are further described as follows:

- A two-story Facility Administration Building with two classrooms, 14 office spaces, a conference room, and four restrooms, with 25 standard parking spaces and two Americans with Disabilities Act (ADA)-accessible spaces adjacent to the building
- A one-story unenclosed Scale House south of the Facility Administration building
- A Maintenance Building with an open interior for repair and maintenance activities associated with on-site processing equipment, on-site mobile equipment, and company-owned delivery vehicles
- A Production/Packaging Building with a main packaging floor, five offices, a break room, a conference room, and two restrooms. There would be 11 standard parking spaces and two ADA-accessible spaces for employees adjacent to this building, with another 30 standard spaces in a separate area just north of this building. In addition to employee parking, the production/packaging facility would include four loading docks.
- A fully enclosed Wet Organics Building with air ventilated through four biofilters to control volatile organics and odor emissions. The building would include an internal break room and two full restrooms with the remainder of the structure open to house processing equipment and piles.

[1] Pursuant to Article 2 of the NCZO, a Commercial Organics Processing Operation is defined "(a)n organics processing operation that includes the sale or off-site distribution of the product produced. Does not include the processing of mixed solid waste or Biosolids or On-Site Composting Operations. Those operations which have up to 200 cubic yards of any combination of separated feedstock, actively decomposing compost, or stabilized compost on-site at any one time are Small-Scale, and those with up to 1,000 cubic yards are Medium-Scale, and those with over 1,000 cubic yards are Large-Scale."

- A partially open Dry Organics Building with a roof canopy and open sides. The building would be a partially open structure with no internal rooms that would house various pieces of processing equipment

Table ES-1 Project Characteristics

Address	Terminus of Edwards Ranch Road
Assessor's Parcel Number (APN)	090-0-180-085 (Project site is on 70 acres of the 994-acre parcel)
Height/Stories	Facility Administration Building: Two-story, 35 ft. in height Maintenance Building: Single-story, 33 ft. in height Production/Packaging Building: Single-story, 33 ft. in height Wet Organics Building: Single-story, 33 ft. in height Dry Organics Building: Single-story, 33 ft. in height
Project Area	70 acres
Proposed Building Footprint	Approximately 230,779 sq. ft.
Facility Administration Building	7,022 sq. ft. (first floor) 6,494 sq. ft. (second floor)
Scale House	13,800 sq. ft.
Maintenance Building	25,000 sq. ft.
Production/Packaging Building	23,107 sq. ft.
Wet Organics Building	80,925 sq. ft.
Dry Organics Building	80,925 sq. ft.
Land Uses	
Buildings and Associated Parking Lots	230,779 sq. ft.
Retention Basins (2)	243,936 sq. ft.
Landscaping Area	223,350 sq. ft.
Utility Pad	31,900 sq. ft.
Green/Wood/Ag. Feedstock	36,250 sq. ft.
AD Units (4)	~40,000 sq. ft.
CASP Units (2)[1]	Approximately 74,450 sq. ft.
Open Windrow Composting Piles[1]	Approximately 806,433 sq. ft.

[1] CASP Units and Open Windrow Composting Piles areas were estimated based off best available data in the Site Plans (Harrison Industries 2018). No exact measurements are available.

sq. ft. = square feet; ft. = feet; Ag. = Agriculture; AD = Anaerobic Digestion; CASP = Covered Aerated Static Piles

Source: Harrison Industries 2018.

Construction

The proposed Project is expected to be constructed in two phases beginning at the end of 2021. The phased development plan would utilize modular technology components that can be deployed in phases and integrated into the Project, allowing phased capital outlay and development flexibility based upon market and regulatory changes. Currently, the anticipated phasing would be as follows:

- Phase 1 – Partial Construction of Green Processing Infrastructure, with completion in late 2022 to late 2023
  - Construct intersection improvements at Telegraph Road

- Other access upgrades and on-site road improvements
- Landscaping
- Site grading, construction of drainage basins
- Partial construction of impermeable windrow pads
- Partial build out of the open windrow composting operation
- Build Scale House
- Utility infrastructure as needed

- Phase 2 – Remaining Construction of Green Processing Infrastructure, timing as demand requires
  - Construct impermeable windrow pads
  - Additional buildout of the open windrow composting operation
  - Construct the Dry Organics Receiving Building for green material
  - Utility infrastructure as needed
  - Phase 3 – Construction of Food Material Processing Infrastructure, timing as demand requires
  - Construct the Wet Organics Receiving building for food material
  - Construct the CASP system
  - Construct the AD system
  - Construct the Packaging/Production Building, and the Maintenance Building
  - Utility infrastructure as needed
  - Phase 4 – Construction of the Administration Building
  - Construct the Facility Administration Building
  - Utility infrastructure as needed

Project Objectives

- Produce and provide local and regional agricultural and nursery customers with high-quality composted products
- Assist in meeting California's greenhouse gas (GHG) reduction goals of Assembly Bill (AB) 32, and AB 1826. Although GHG emissions are created by the composting process, these are outweighed by the avoided uncontrolled GHG emissions associated with landfills[2]
- Assist in meeting the landfill diversion goals in AB 939, AB 341, and Senate Bill (SB) 1383 as well as meeting the SB 1383 procurement requirements for jurisdictions (including the County of Ventura) as found in California Code of Regulations (CCR) 14 Section 18993.1 (adopted July 2020)
- Produce carbon negative fuel: The AB 32 Low Carbon Fuel Standard calls for a statewide 10 percent fuel intensity reduction by 2020. The renewable Compressed Natural Gas (CNG) to be produced by the Project's dry anaerobic digestion (AD) facility will assist California in meeting

[2] According to the U.S. Environmental Protection Agency's Landfill Methane Outreach Program landfill gas is comprised of roughly 50 percent carbon dioxide and 50 percent methane. Whereas a compost pile decomposes aerobically – with oxygen – producing mainly carbon dioxide. Methane is a potent GHG, 28 to 36 times more effective than carbon dioxide at trapping heat in the atmosphere over a 100-year period and therefore is more devastating to the climate. Please see the following link for more information: https://www.epa.gov/lmop/basic-information-about-landfill-gas#:~:text=LFG%20is%20extracted%20from%20landfills,in%20an%20LFG%20energy%20project.

that goal. Biomethane generated from the AD of food material and green material has been determined by California Air Resources Board (CARB) to be carbon negative.

- Facilitate waste diversion and landfill space conservation through green material and food material composting
- Provide a convenient, environmentally compliant, and cost-effective facility for the recycling of food material, green material, and other organic materials
- Promote public awareness of the benefits of recycling organics through public outreach programs
- Stimulate employment opportunities in the County of Ventura by adding additional employees at the site[3] and through the operator's ongoing efforts to increase the use of organic products by farmers, landscape companies, golf courses, parks departments, and other similar users of such products

Alternatives

As required by CEQA, this EIR examines alternatives to the proposed Project. Studied alternatives include the following three alternatives:

- Alternative 1: No Project Alternative
- Alternative 2: Alternate Technology Mix
- Alternative 3: Reduced Intensity

Under the No Project Alternative, there would be no change to the Project site and the proposed Project would not be constructed. The existing composting operations would continue at current levels with no expansion or change in operation. In addition, the adjacent 55 acres of citrus orchards would remain operational. No roadway, landscaping, utility, or vehicle parking improvements would occur and none of the project objectives would be met.

Under Alternative 2 (Alternate Technology Mix), the same amount of feedstock waste and other organic materials (i.e., food and landscape waste) would be brought to the Project site for processing as under the proposed Project, but a different composting technology mix for processing organic material brought to the Project site would be utilized as follows: 25 percent open air windrow (OAW)[4], 60 percent covered aerated static pile (CASP), and 15 percent AD, rather than the composting technology mix included in the proposed Project of 60 percent OAW, 25 percent CASP, and 15 percent AD. Using CASP technology allows construction of larger piles that require less land area than using OAW technology (US EPA, 2021); however, because of operational and space constraints that are necessary around either a CASP, OAW or combination of both systems, any decrease in total acres of composting facility and acres of farmland removed from production would be minimal. This alternative therefore assumes a less than one acre reduction in composting facility area compared to the proposed Project, resulting in 69+ acres of composting facility area (54+ acres of which would be new). As such, 54+ acres of citrus orchards adjacent to the existing 15-acre facility would be converted from Prime Farmland use to composting facility use rather than the 55 acres of existing citrus orchard that would be converted under the proposed Project, although only approximately 21 acres of this conversion is considered permanent. Roadway, landscaping, and

[3] Pursuant to communication received from the applicant's representative, the Project will only result in a net gain of 26 new employees based on the projection of a total of 37 site employees and subtracting the existing 11 employees presently working at the site.

[4] OAW uses naturally occurring microbes that feed on organic material (i.e., feedstock waste) and require oxygen. By feeding on organic material, the microbes break down the material and turn it into compost.

utility improvements would occur that would be similar in scope and location to those of the proposed Project, and vehicle parking improvements would be the same because there would be no reduction in employees compared to the proposed Project.

Alternative 3 (Reduced Intensity) would reduce the amount of feedstock waste and other organic materials (i.e., food and green material) brought to the site by 20 percent. This different composting intensity at the Project site would consist of 56 acres of composting facility area (41 acres of which would be new). As such, 41 acres of citrus orchards adjacent to the existing 15-acre facility would be converted from Prime Farmland use to composting facility use, although only 29 acres of this conversion is considered permanent. Roadway, landscaping, and utility improvements would occur that would be similar in scope and location to those of the proposed Project. Vehicle parking improvements would be reduced by 20 percent to reflect a 20 percent reduction in employees compared to the proposed Project.

Each alternative's environmental impacts relative to the proposed Project, and their ability to meet the Project objectives, were analyzed in Section 6, *Alternatives* of this EIR, which found that Alternative 1 (No Project) would be the environmentally superior alternative, and that Alternative 2 (Alternate Technology Mix) would be the environmentally superior alternative other than the No Project Alternative.

Areas of Known Controversy and Issues to be Resolved

Responses to the Notice of Preparation (NOP) of a Draft EIR and input received at the EIR scoping meeting held by the County are summarized in Section 1, *Introduction*. Areas of known controversy or other issues to be resolved have been identified based on comments received in response to the NOP, as well as comments received during the initial review of the project description.

In their comment letter (dated April 20, 2020) in response to the NOP, Ventura County Local Agency Formation Commission (LAFCo) staff identified the following concerns with the Project:

- Project consistency with LAFCo Handbook Section 1.4.3.1.e related to General Plan consistency for both the Ventura County General Plan and City of Santa Paula General Plan
- Project consistency with LAFCo Handbook Policies related to approval of Out-of-Agency Service Agreements (OASAs) which generally pertain to consistency with general plans
- Project consistency with Save Openspace and Agricultural Resources (SOAR) Ordinance goals which relate to the preservation of agricultural lands
- Water service is proposed to be provided from the City of Santa Paula, and because the project is located outside Santa Paula's jurisdictional boundaries, Government Code Section 56133(a) requires that the City of Santa Paula obtain approval from LAFCo before the City of Santa Paula can provide a new or extended service to the Project site via an OASA.
- The Project site is located outside of the City of Santa Paula's City Urban Restriction Boundary (CURB) which, under the City's own SOAR Ordinance, would further restrict urban services from being extended to the Project site
- Project consistency with other policy documents like the Ventura County Greenbelt Agreement and the Guidelines for Orderly Development

Other comments received on the NOP either issued standard requirements or otherwise did not identify any areas of known controversy or issues to be resolved and are therefore not summarized here. All comments on the NOP are included in Appendix B of this EIR.

Required Approvals

The proposed Project would require the following discretionary approvals from the County of Ventura Board of Supervisors:

- A NCZO Text Amendment Section 8107-36.4.1(a)
- A Conditional Use Permit (CUP) to construct and operate a Commercial Organics Processing Operation[5]

Additional approvals would be required from other agencies in order to implement the proposed project, including the following:

- LAFCo approval of an OASA to extend water service to the Project site
- A Solid Waste Permit granted by the County of Ventura Resource Management Agency Environmental Health Division pursuant to Title 14 and 27 California Code of Regulations
- Grading permits from the Development and Inspection Services Division of the Ventura County Public Works Agency
- Building permits from the Building and Safety Division of the Ventura County Resource Management Agency
- Ventura County Air Pollution Control District for an Authority to Construct and Permit to Operate
- California Department of Resources Recycling and Recovery (CalRecycle) for a license to operate a commercial organics processing operation
- California Department of Fish and Wildlife (CDFW) for a Lake and Streambed Alteration Agreement to comply with California Fish and Game Code Section 1602
- Compliance documents for Composting Operations under Los Angeles Regional Water Quality Control Board Order WQ 2020-0012-DWQ (General Waste Discharge Requirements) through the Ventura County Watershed Protection District - County Stormwater Program
- Access and utility easements

Summary of Impacts and Mitigation Measures

Listed below are the environmental issue areas for which the proposed Project would result in a significant and unavoidable impact or less-than-significant impact with mitigation incorporated. Any items not addressed below have been identified in the Initial Study, which is Appendix A of this EIR. The Initial Study previously circulated on March 20, 2020 to April 20, 2020 identified mitigation measures which avoid or reduce potentially significant impacts of the proposed Project to a less than significant level for the following issues:

- Air Quality (AQ MM-1 Dust Prevention, AQ MM-2 Nuisance, AQ MM-3 Permits Required)
- Water Resources – Surface Water Quality (CSWP MM-1 Post-Construction Best Management Practices)
- Biological Resources (BIO MM-1 Pre-Construction Surveys & Construction Monitoring for Monarch Butterfly, BIO MM-2 Pre-Construction Surveys and Relocation of Special-Status Reptile

[5] Following a public hearing by the Ventura County Planning Commission, the Board of Supervisors may approve, conditionally approve or disapprove the Planning Commission recommendation regarding the amendment and requested CUP.

Species BIO MM-3 California Department of Fish and Wildlife (CDFW) Lake & Streambed Alteration Agreement (LSAA), BIO MM-4 Lighting Plan)

- Cultural Resources – Historic (CULTURAL MM-1 Historic American Buildings Level-III Photo Survey, Cultural MM-2 Screening and Landscaping Plan)
- Noise and Vibration (NOISE MM-1 Construction Noise with Idling Restriction)
- Public Health (WASTE MM-1 Composting Facility – Wet and Dry Organics Processing Design, Operation, and Maintenance)
- Transportation & Circulation – Roads and Highways – Safety and Design of Public Roads (TRANSPORTATION MM-1 Road Improvements)
- Waste Treatment & Disposal Facilities – Solid Waste Facilities (Reference back to WASTE MM-1 Composting Facility – Wet and Dry Organics Processing Design, Operation, and Maintenance)

Table ES-2 summarizes the environmental impacts of the proposed Project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required) identified in this EIR. Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the Project is approved per §15093 of the State CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the State CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The proposed Project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure(s)	Residual Impact
Agricultural Resources – Soils		
Impact AG-1. The project would result in the direct loss of approximately 34.26 acres of Prime Farmland to an agricultural accessory use.	**AG-1, Establish an Agricultural Conservation Easement:** **Purpose**: To ensure compliance with Ventura County General Plan Agricultural Element Implementation Measure O and Policies AG-1.1 and AG-1.8. To establish an agricultural conservation easement that ensures the protection of offsite farmland at a 1:1 ratio (acres preserved: acres converted) to compensate for the direct and indirect loss of Prime/Statewide Important Farmland ("Classified Farmland") from buildings, paved areas, and onsite wastewater treatment system developed for the project. Based on the current project description, the project is expected to result in the loss of 34.26 acres of Prime/Statewide Important Farmland. **Requirement**: The Permittee shall identify a total of 34.26 acres of equivalent Classified Farmland, outside the project's CUP boundaries, to be preserved through the	Significant and Unavoidable

Impact	Mitigation Measure(s)	Residual Impact
	establishment of an offsite agricultural conservation easement. Total acreage of the agricultural mitigation site(s) to be encumbered by the conservation easement may be adjusted by the Planning Division if the project is modified, resulting in an increase or decrease in the loss of Classified Soils, prior to the issuance of zoning clearance for construction of Phase I, Phase 2, or approved CUP modifications. The proposed mitigation site(s) shall be located in the County of Ventura unincorporated area, must not be encumbered by an existing conservation easement, and must be of sufficient size to be viable for long term farming use as determined by the Planning Director in consultation with the Agricultural Commissioner. **Documentation**: The Permittee shall prepare a report, in consultation with the Agricultural Commissioner, that identifies a minimum of one agricultural mitigation site suitable for protection pursuant to the required agricultural conservation easement. The contents of the report shall include a description of mitigation site(s), including a site plan of the location and rationale for site selection, information to determine the viability of the proposed mitigation site(s) for the establishment of an agricultural conservation easement, and maintenance and monitoring necessary to ensure that each agricultural mitigation site is not developed, rezoned, or subdivided. The agricultural conservation easement shall be recorded with the Ventura County Recorder and appear in the chain of title of the encumbered real property, with a copy of the recorded document provided to the Planning Division. The agricultural conservation easement(s), which shall be conveyed to and held by a County-approved entity qualified to hold the instrument (such as a public entity or land trust), shall remain in effect at least until the CUP expires and all developed area(s) have been converted to an agricultural use, as determined and approved in writing by the Planning Division in consultation with the Agricultural Commissioner. If the Permittee seeks modifications to the approved CUP such as the square footage for buildings and paved areas associated with the approved project, the Permittee shall submit an application to modify the CUP and agricultural conservation easement(s). The Permittee shall also deposit funds with the County to contract with a qualified third party agricultural economic consultant ("Qualified Consultant") to review and advise the Planning Director and Agricultural Commissioner regarding the establishment and implementation of the agricultural conservation easement(s). Prior to the County engaging with a Qualified Consultant, the County shall confer in writing with the Permittee regarding the necessary work to be contracted, as well as the estimated costs of such work. Whenever feasible, the County will use the lowest responsible bidder or proposer. Any decisions made by County staff in reliance on the Qualified Consultant work may be appealed pursuant to	

Impact	Mitigation Measure(s)	Residual Impact
	the appeal procedures contained in the Ventura County Zoning Ordinance Code then in effect. The Project applicant shall bear the full costs of all County staff time, materials, and County-retained consultants. **Timing**: Prior to zoning clearance for use inauguration, the Permittee shall submit to the Planning Director for review and approval, the following: 1. The required fee for services to be completed by the Qualified Consultant. 2. The agricultural report and agricultural conservation easement(s), in accordance with the applicable requirements of this condition (above). 3. A final executed conservation easement(s), approved as to form by the County Counsel, recorded with the Ventura County Recorder, and Preliminary Title Report that verifies the conservation easement(s) on the encumbered real property. **Monitoring and Reporting**: The Permittee shall submit monitoring reports and be subject to site inspections occurring no less than once every 3 years, unless the terms of the permit require more frequent inspections of the conservation easement. The Planning Division maintains a copy of the agricultural conservation easement report and recorded agricultural conservation easement(s) in the Project File. Planning Division staff has the authority to conduct periodic site inspections at any time to ensure ongoing compliance with this condition. If the Planning Division confirms that the agricultural conservation easement(s) has not been maintained as required, enforcement actions may be enacted in accordance with § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.	
Impact AG-2. The Project would not require a General Plan Amendment. Therefore, no impact would occur.	None required	No Impact
Impact AG-3. The Project would be inconsistent with applicable Ventura County General Plan policies to preserve and protect agricultural lands (AG-1.1 and AG-1.2) and policies to reduce conflicts of development adjacent to agriculturally designated lands (AG-2.1). In addition, the Project would be inconsistent with the Agricultural/Urban Buffer Policy.	**AG-2, Compliance with Ventura County Agricultural Commissioner's Office recommendations:** **Purpose:** To ensure consistency with Ventura County General Plan policies (AG-1.1, AG-1.2, AG-2.1, and Agricultural/Urban Buffer Policy). **Requirement:** Prior to design approval and issuance of grading and building permits, the County shall require the Project to include the following: 1. The Permittee shall prepare a final landscape plan, which shall be subject to authorization by the Agricultural Policy Advisory Committee and install a modified vegetative screen which meets the intent of the agriculture buffer policy and implements the following minimum requirements: ▪ Two staggered rows of trees and shrubs characterized by evergreen foliage that extends from the base of the plant to the crown ▪ Trees and shrubs shall be vigorous, drought tolerant, and at least 6 feet in height at the time of	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
	installation (a minimum 24-inch box size for selected tree specimens) ▪ Plants shall have 50 to 75 percent porosity (i.e., approximately 50 to 75 percent of the plant is air space) ▪ Plant height shall vary in order to capture drift within four feet of ground applications ▪ Tree species shall have a mature height of 15 feet or more ▪ To ensure adequate coverage, two staggered rows should be located 5 feet apart and consist of minimum 5-gallon plants at least 6 feet tall planted 10 feet on center ▪ Recommended plants include toyon (Heteromeles arbutifolia), sugarbush (Rhus ovata), laurel sumac (Malosma laurina), and Italian cypress (Cupressus sempervirens) ▪ A long-term plan shall be in place for maintaining the vegetative shelter belt 2. Installation of a reinforced 8-foot high chain link fence with top bar providing connections and additional stability between fenceposts 3. Coordination between Limoneira Company and the Permittee (Agromin) regarding the schedule of approved agricultural pesticide application and notification thereof 4. Posting of Right-to-Farm Ordinance at the project site **Documentation:** The Permittee shall submit the draft landscape plan to the Agricultural Commissioner's Office for review and approval by the Agricultural Policy Advisory Committee. The Permittee shall submit the final design plans demonstrating compliance with the other provisions of the mitigation measure to the Planning Division for review and approval. A California registered landscape architect (or other qualified individual as approved by the Planning Director) shall prepare the landscape plan, demonstrating compliance with the requirements set forth in this mitigation measure, § 8109-0.6 (Landscaping) of the Non-Coastal Zoning Ordinance, and the Ventura County Landscape Design Criteria. The landscape architect responsible for the work shall stamp the plan. After landscape installation, the Permittee shall submit to Planning Division staff a statement from the Project landscape architect that the Permittee installed all landscaping as shown on the approved landscape plan. Prior to installation of the landscaping, the Permittee must obtain the Planning Director's approval of any changes to the landscape plans that affect the character or quantity of the plant material or irrigation system design. **Timing:** The Permittee shall prepare and submit a final landscape plan and final design plans for review and approval by the Planning Division and the Agricultural Policy Advisory Committee prior to issuance of a Zoning Clearance for construction. Landscaping installation and maintenance activities shall occur according to the timing	

Impact	Mitigation Measure(s)	Residual Impact
	requirements set forth in the "Ventura County Landscape Design Criteria" (§ F). **Monitoring and Reporting:** Landscaping approval/installation verification, monitoring activities, and enforcement activities shall occur according to the procedures set forth in the "Ventura County Landscape Design Criteria" (§§ F and G) and § 8114-3 of the Non-Coastal Zoning Ordinance. The Planning Division maintains the landscape plans and final design plans in the Project file and has the authority to conduct site inspections to ensure that the Permittee installs and maintains the landscaping in accordance with the approved plan consistent with the requirements of § 8114-3 of the Non-Coastal Zoning Ordinance.	
Transportation & Circulation - VMT		
Impact TRANS-1. The results of the Vehicle Miles Traveled (VMT) analysis indicate that the proposed Project would result in a net increase in VMT in the area.	**TRANS-1 Implement Measures to Reduce VMT** **Purpose:** To achieve consistency with the "no net increase" threshold of Ventura County General Plan Implementation Program CTM-P: Interim VMT CEQA Assessment Criteria. **Requirement:** The Applicant will take all feasible actions to reduce the Project's VMT. The Applicant shall specify feasible measures to reduce the Projects VMT and shall provide an estimate of the VMT reduction that would result from each measure. OPR's Technical Advisory recommendations include the following measures to reduce VMT that may be applicable to the proposed Project: ▪ Provide bicycle parking ▪ Implement or provide access to a commute reduction program ▪ Provide car-sharing, bike-sharing, and ride-sharing programs ▪ Shifting single-occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services ▪ Provide incentives or subsidies that increase the use of modes other than single-occupancy vehicle ▪ Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms ▪ Provide employee transportation coordinators at employment sites Prior to issuance of the first building permit for the Project, the applicant shall submit a report to the County Planning Division describing which of these actions, or other VMT-reducing actions, it will take to help reduce the VMT specifically related to the Project. This report shall also describe why the selected actions were chosen; provide an estimate of the amount of expected VMT reduction from each action and the total estimated VMT reduction from all actions; and, if the chosen actions would not reduce VMT increases to a less than "net zero" increase from existing conditions, describe why further actions to reduce VMT increases to "net zero" were	Significant and Unavoidable

Impact	Mitigation Measure(s)	Residual Impact
	determined to be infeasible. The County Planning Division and the Public Works Agency, Transportation Department shall be responsible for approving this report prior to issuance of the first building permit for the Project. **Documentation:** The applicant shall submit a report to the County Planning Division describing what VMT-reducing actions it will take to help reduce the VMT specifically related to the Project, consistent with the requirements of this mitigation measure. **Timing:** Prior to issuance of the first building permit for the Project. **Monitoring and Reporting:** The County Planning Division and the Public Works Agency, Transportation Department shall be responsible for approving this report, and confirming that it complies with the requirements of this mitigation measure.	

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1 Introduction

This document is an Environmental Impact Report (EIR) for the proposed Agromin-Limoneira Commercial Organics Processing Operation Project (hereafter referred to as the "proposed Project" or "Project"). The proposed Project site is located at the terminus of Edwards Ranch Road, south of State Route 126, approximately 5 miles west of the City of Santa Paula in the unincorporated area of Ventura County. The proposed Project includes a Conditional Use Permit (CUP) and Non-Coastal Zoning Ordinance (NCZO) Text Amendment to permit the expansion of an existing 15-acre agricultural organics processing operation to a new 70-acre commercial organics processing operation[1] that would process food and green material delivered to the site and package-for-sale mulch, compost, and wood chip materials.

This section discusses the Project and EIR background, the legal basis for preparing an EIR, the scope and content of the EIR, issue areas found not to be significant by the Initial Study, the lead, responsible, and trustee agencies, and the environmental review process required under the California Environmental Quality Act (CEQA). The proposed Project is described in detail in Section 2, *Project Description*.

1.1 Environmental Impact Report Background

The County of Ventura Resource Management Agency (County) prepared an Initial Study (IS) for the proposed Project which found that the Project has the potential to create significant impacts that must be analyzed as part of an EIR. As a result, the County distributed a Notice of Preparation (NOP) of the EIR, with the Initial Study attached (see Appendix A[2]), together forming the IS-NOP. The IS-NOP was distributed for a 30-day agency and public review period starting on March 20, 2020 and ending on April 20, 2020. CEQA Section 21092(b)(3) requires the NOP be distributed by at least one of three options:

a. Publication, no fewer times than required by Section 6061 of the Government Code, by the public agency in a newspaper of general circulation in the area affected by the proposed project. If more than one area will be affected, the notice shall be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.
b. Posting of notice by the lead agency on- and off-site in the area where the project is to be located
c. Direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll

The NOP for this EIR was posted in the Ventura County Star, a local newspaper, on March 20, 2020. The NOP was also distributed via direct mailing to the public and interested parties on March 13,

[1] The NCZO defines a commercial organics processing operation as "An organics processing operation that includes the sale or off-site distribution of the product produced. Does not include the processing of mixed solid waste or Biosolids or On-Site Composting Operations. Those operations which have up to 200 cubic yards of any combination of separated feedstock, actively decomposing compost, or stabilized compost on-site at any one time are Small-Scale, and those with up to 1,000 cubic yards are Medium-Scale, and those with over 1,000 cubic yards are Large-Scale." (Ventura County, 2020)

[2] Minor typographical errors in the Initial Study distributed during the NOP comment period are addressed in Appendix A. Changes in text are signified by strikeouts with grey highlight (~~strikeouts~~) where text is removed and by underlined font with grey highlight (underlined font) where text is added. These changes were made to correct minor errors in the text and do not represent substantial changes.

2020, with an updated notice sent on April 7, 2020 to inform the public of the rescheduled scoping meeting, which occurred on April 14, 2020. The NOP for this EIR was posted at the County office, the Ventura County Clerk-Recorder office, and online at the County website.

The County held an EIR scoping meeting on April 14, 2020 from 6:00 PM to 8:00 PM. Information about the proposed Project was presented to members of public agencies, interested stakeholders, and residents/community members at the meeting. The meeting was held online through a Zoom webinar to comply with Ventura County Board of Supervisors Resolution No. 20-20 "Stay Well at Home," which declared a Local Emergency related to the COVID-19 pandemic. The County received letters from 11 state, regional, and local agencies, as well as one individual, in response to the NOP during the public review period. No verbal comments were received during the EIR scoping meeting that would need to be addressed in this EIR. County staff responded to an inquiry from the City of Ventura regarding the timing of the approval and subsequent approvals required for the Project. County staff indicated that an out-of-area service agreement (OASA) would be required for extension of water service to the Project with the Ventura County Local Agency Formation Commission (LAFCo) as the responsible agency. The County of Ventura Environmental Health Division would be responsible for the authorization of the Solid Waste Permit as the Local Enforcement Agency. Appendix A of this EIR includes the NOP and the IS that was prepared for the Project. Table 1-1 on the following page summarizes the content of the letters and where the issues raised are addressed in the EIR. Appendix B of this EIR presents the original NOP comment letters.

1.2 Purpose and Legal Authority

The proposed Project requires the discretionary approval of the County of Ventura; therefore, the Project is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the CEQA Guidelines (California Code of Regulations [CCR], Title 14), the purpose of this EIR is to serve as an informational document that:

> "...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This EIR has been prepared as a Project EIR pursuant to Section 15161 of the CEQA Guidelines. A Project EIR is appropriate for a specific development project. As stated in the CEQA Guidelines:

> "This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation."

This EIR is to serve as an informational document for the public and County of Ventura decision makers. The CEQA process will include public hearings before the Planning Commission and Board of Supervisors to consider certification of a Final EIR and approval of the proposed Project.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request	How and Where Comments are Addressed
Agency Comments		
Native American Heritage Commission (NAHC)	States the proposed Project is subject to the requirements and provisions under Assembly Bill (AB) 52 for tribal cultural resources.	Addressed in Section 4.3.8 in Section 4.3, *Effects Found Less Than Significant*, of this EIR and in IS Section 8A, *Cultural Resources*
California Department of Transportation (Caltrans)	States the Project would generate additional vehicle trips; requests to confirm the number of employees at the facility.	Addressed in Section 2, *Project Description* (Table 2-4: *Project Employees*), Appendix C *Vehicle Miles Travelled (VMT) Analysis*, and Section 4.2, *Transportation & Circulation*
	States the proposed Project would temporarily disrupt transportation and circulation patterns in the vicinity of the proposed Project. Caltrans requests a Construction Management Plan (CMP) prior to issuance of building or grading permits for the Project site for review and approval by County staff to reduce transportation-related impacts to less-than-significant levels.	Addressed in Section 4.3.27 in Section 4.3, *Effects Found Less Than Significant*, of this EIR and in IS Section 27a, *Transportation & Circulation*
	Requests the EIR specifies that Caltrans has jurisdiction for review and approval of any work that would affect the freeways and its facilities. Requires a VMT analysis to confirm the Project would result in a net reduction in per capita VMT.	Addressed in Appendix C, *Vehicle Miles Travelled (VMT) Analysis*
California Department of Resources Recycling and Recovery (CalRecycle)	Requests an analysis for the maximum daily tonnage of all materials that will be received at the facility.	Addressed in Section 2, *Project Description*, and in Section 4.3.29 in Section 4.3, *Effects Found Less Than Significant*, of this EIR, as well as in the IS Section A, *Project Description*
	Provides point of contact for the Local Enforcement Agency (LEA) responsible for providing regulatory oversight of solid waste handling activities in Ventura County. Applicant shall contact the LEA to discuss regulatory requirements for the proposed Project.	Addressed in Section 2, *Project Description*, of this EIR
Camarillo Chamber of Commerce Oxnard Chamber of Commerce City of Ojai City of Ventura[3]	Offers support for the Project. Requests that the Draft EIR includes the regional benefits to the environment as the Project is developed; the fact that the Project is consistent with, and supportive of, agriculture and thus its appropriateness to be developed in an AE zone; and the penalties and impacts on the economy for not complying with the State mandate (Senate Bill [SB] 1383).	Addressed in Section 2, *Project Description,* of this EIR

[3] Each of the four agencies, Camarillo Chamber of Commerce, Oxnard Chamber of Commerce, City of Ojai, and City of Ventura, submitted a copy of the same letter. Their comments were summarized in the same row above.

Commenter	Comment/Request	How and Where Comments are Addressed
City of Camarillo	Requests the County of Ventura Board of Supervisors and County staff expedite the approval of proposed Project to assist the City of Camarillo in implementing the mandates of SB 1383 and includes Resolution 2020-30 adopted February 26, 2020 by the City of Camarillo City Council which formalizes this request.	Comments noted and referred to County Compliance with SB 1383 addressed in Section 2, *Project Description*, of this EIR
California Department of Fish and Wildlife (CDFW)	Recommends the inclusion of three mitigation measures to reduce impacts to special-status plant species associated with the wetland and riparian habitats located within the Project's footprint.	Addressed in Section 4.3.4 in Section 4.3, *Effects Found Less Than Significant*, of this EIR and in Section 4B, *Ecological Communities – Sensitive Plant Communities*, of the IS
	Recommends the inclusion of three mitigation measures to reduce impacts to special-status wildlife species that are likely to occur within the Project vicinity considering its proximity to the Santa Clara River. In addition, CDFW includes mitigation measures for raptors, nesting birds, and bats.	Addressed in Section 4.3.4 in Section 4.3, *Effects Found Less Than Significant*, of this EIR and in Section 4A, *Biological Resources – Species*, of the IS
	Recommends one mitigation measure to protect multiple state-listed species with potential to occur in the Project area.	Addressed in Section 4.3.4 in Section 4.3, *Effects Found Less Than Significant*, of this EIR.
	Recommends two mitigation measures to reduce impacts to the loss of streams and associated watershed function within the Project area.	Addressed in Section 4.3.4 in Section 4.3, *Effects Found Less Than Significant*, of this EIR and in Section 4C, *Ecological Communities – Waters and* Wetlands of the IS.
Ventura Local Agency Formation Commission (Ventura LAFCo)	Recommends the EIR consider mitigation measures to address the potential loss of agricultural land pursuant to the Ventura LAFCo Commissioner's Handbook (Handbook).	Addressed in Section 4.1, *Agricultural Resources – Soils*, of the EIR and in IS Section 5A, *Agricultural Resources – Soils*
	States the proposed Project is inconsistent with the County General Plan and the City of Santa Paula General Plan, including Save Openspace and Agricultural Resources (SOAR) measures, and therefore also inconsistent with several LAFCo policies. Ventura LAFCo requests that the EIR discuss these inconsistencies, such as those surrounding LAFCo policies, including policies pertaining to Out-of-Agency Service Agreements (OASAs), County General Plan/SOAR policies, such as inconsistencies pertaining to proposed development and proposed text amendment; City of Santa Paula General Plan/SOAR policies, including other growth management policies; Ventura – Santa Paula Greenbelt Agreement; and Guidelines for Orderly Development.	Addressed in Section 4.1, *Agricultural Resources*, and Section 4.3.5 in Section 4.3, *Effects Found Less Than Significant*, of this EIR and Section 5B, *Agricultural Resources – Land Use Incompatibility*, and Section 25a, *Community Character*, of the IS. The Project is in an unincorporated area of Ventura County, is not within the City of Santa Paula's Sphere of Influence and is therefore not required to comply with Santa Paula's General Plan.

Commenter	Comment/Request	How and Where Comments are Addressed
	Recommends consistency with Government Code Section 56133, which requires that cities obtain LAFCo approval before they provide new or extended service to project sites outside their jurisdictional boundaries, be evaluated in the EIR.	Addressed in Section 2, *Project Description*, Section 4.3, *Effects Found Less Than Significant*, and Section 5, *Other CEQA Required Discussions*, of this EIR
Ventura County Transportation Commission (VCTC)	Requests Page 2, Section A.5 of the Initial Study be changed from "Ventura County Transportation Committee" to "Ventura County Transportation Commission." If the Project includes widening or improving the Edwards Ranch Road rail crossing, VCTC requires submittal of plans for approval and likely would require approval by the California Public Utilities Commission.	Addressed in Section 2, *Project Description*, of the EIR
	States the existing rail line located north of the Project site is incorrectly described as inactive. The VCTC maintains the rail line as an active railroad.	Addressed in Section 2, *Project Description*, of the EIR
	States the Edwards Ranch Road rail crossing is incorrectly described as granted by a private license agreement between the Limoneira Company and VCTC. VCTC does not have record of a private rail crossing agreement.	Addressed in Section 2, *Project Description*, of the EIR
	Recommends the EIR analyzes and considers the potential impacts to recreation and transportation related to the planned Santa Paula Branch Line Recreational Trail. Specifically, the commenter would like the EIR to consider whether increased truck traffic crossing the railroad track, or any other aspects of the proposed Project, could impact trail development and use.	Addressed in Section 4.3, *Less than Significant Environmental Effects*, of this EIR
Public Comments		
Thomas O. Lloyd-Butler	Expresses concern about size of the expansion, development occurring in an agricultural location, and historical resources, specifically related to preserving the historical Edwards House.	Addressed in Section 2, *Project Description*, Section 4.1, *Agricultural Resources – Soils,* and Section 4.3, *Less than Significant Environmental Effects*, of this EIR; also addressed in Section 5A, *Agricultural Resources- Soils*, and Section 8B, *Cultural Resources – Historic*, of the Initial Study

1.3 Scope and Content

This EIR addresses impacts identified by the IS to be potentially significant. The following issues were found to include potentially significant impacts and have been studied in the EIR:

- Agricultural Resources – Soils
- Transportation – Vehicle Miles Traveled

In preparing the EIR, pertinent County policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents were used as appropriate. A full reference list is contained in Section 7, *References and Preparers*.

The alternatives section of the EIR (Section 6) was prepared in accordance with Section 15126.6 of the CEQA Guidelines and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the Project while feasibly attaining most of the basic Project objectives. In addition, the alternatives section identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required "No Project" alternative and two alternative development scenarios for the Project area.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the State CEQA Guidelines provides the standard of adequacy on which this document is based. The CEQA Guidelines state:

> An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed Project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

1.4 Lead, Responsible, and Trustee Agencies

The CEQA Guidelines define lead, responsible, and trustee agencies. The County of Ventura is the lead agency for the Project because it holds principal responsibility for approving the Project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the Project. Responsible agencies for the proposed Project under CEQA include the Los Angeles Regional Water Quality Control Board (RWQCB), CalRecycle, Ventura LAFCo, VCTC, and the CPUC.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. CDFW is a trustee agency for the proposed Project because of the potential presence on or near the Project site of special-status species or other biological resources and habitats and the requirements for coordination with CDFW in mitigation measures for the proposed Project such as Mitigation Measure BIO MM-3, California Department of Fish & Wildlife (CDFW) Lake & Streambed Alteration Agreement (LSAA), described in the Initial Study for this project (Appendix A).

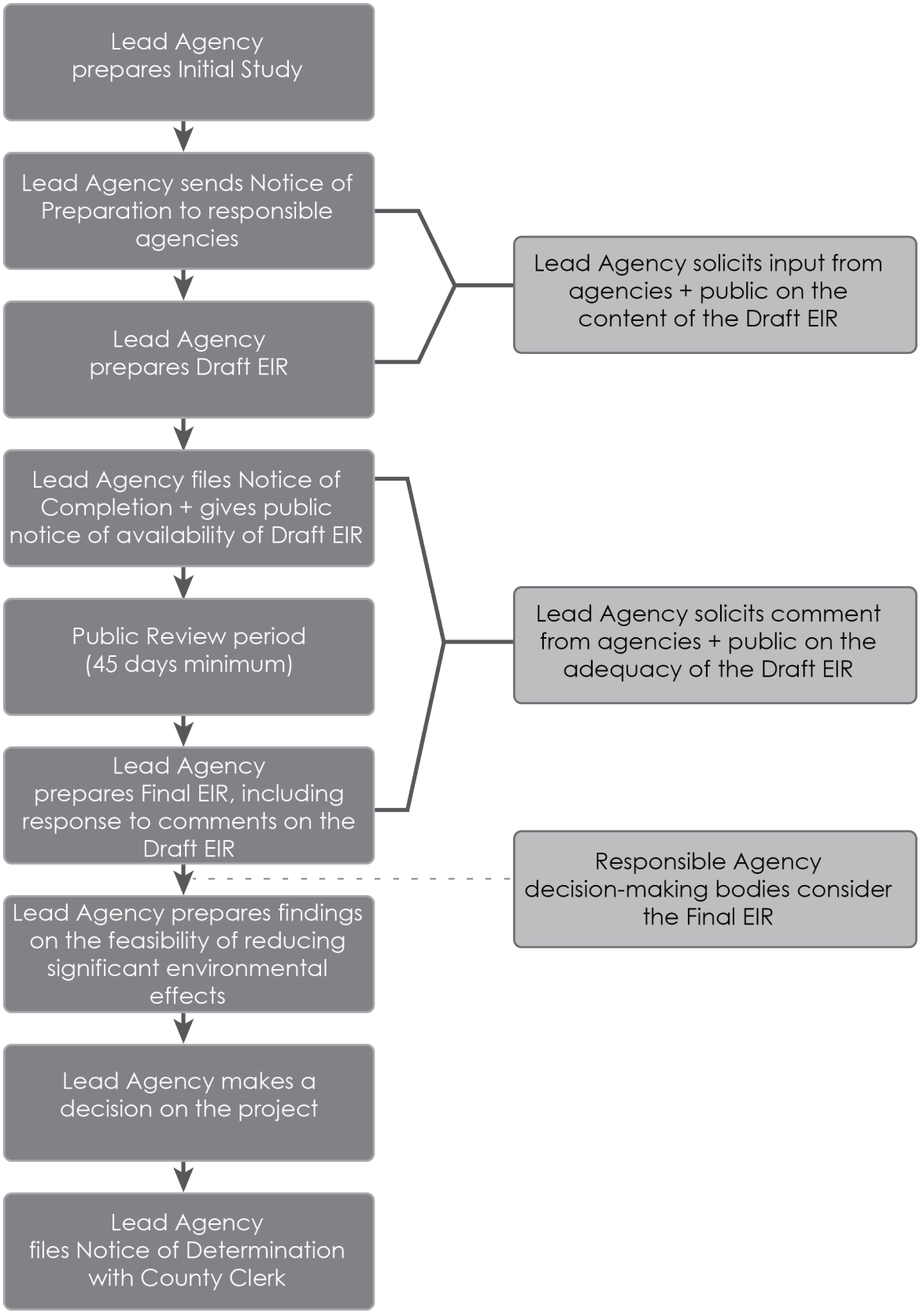
1.5 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation (NOP) and Initial Study**. After deciding that an EIR is required, the lead agency (County of Ventura) must file an NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (State CEQA Guidelines Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an IS that identifies the issue areas for which the Project could create significant environmental impacts.

2. **Draft EIR.** The Draft EIR must contain: a) table of contents or index, b) summary, c) Project description, d) environmental setting, e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts), f) a discussion of alternatives, g) mitigation measures, and h) discussion of irreversible changes.
3. **Notice of Completion (NOC).** The lead agency must file an NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (CEQA Guidelines Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation, b) posting on and off the Project site, and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).
4. **Final EIR.** A Final EIR must include a) the Draft EIR, b) copies of comments received during public review, c) list of persons and entities commenting, and d) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed Project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA, b) the Final EIR was presented to the decision-making body of the lead agency, and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (CEQA Guidelines Section 15090).
6. **Lead Agency Project Decision.** The lead agency may: a) disapprove the Project because of its significant environmental effects; b) require changes to the Project to reduce or avoid significant environmental effects; or c) approve the Project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (CEQA Guidelines Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations**. For each significant impact of the Project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the Project has been changed to avoid or substantially reduce the magnitude of the impact, b) changes to the Project are within another agency's jurisdiction and such changes have or should be adopted, or c) specific economic, social, or other considerations make the mitigation measures or Project alternatives infeasible (CEQA Guidelines Section 15091). If an agency approves a Project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring and Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of Project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file an NOD after deciding to approve a Project for which an EIR is prepared (CEQA Guidelines Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1-1 Environmental Review Process



2 Project Description

This section describes the proposed Project, including the Project applicant, the Project site and surrounding land uses, major Project characteristics, Project objectives, and discretionary actions needed for approval.

2.1 Project Applicant

Bill Camarillo, Chief Executive Officer
CalWood, Inc. (dba Agromin)
201 Kinetic Drive
Oxnard, California 93030
(805) 485-9200

2.2 Lead Agency Contact Person

John Oquendo, Senior Planner
County of Ventura
Resource Management Agency
800 South Victoria Avenue, L#1740
Ventura, California 93009
(805) 654-3588

2.3 Project Location

The 70-acre Project site is located at the south terminus of Edwards Ranch Road, south of State Route 126, approximately 5 miles southwest of the City of Santa Paula, in the unincorporated area of Ventura County. The Tax Assessor's Parcel Number (APN) for the parcel that constitutes the Project site area is 090-0-180-085. The parcel is part of a larger 994-acre subdivided lot. Currently, 15 acres of the 70-acre Project site are used for an agricultural composting facility. The remainder of the subject parcel includes lemon orchards, three propane-powered windmills, and oil and gas wells. Figure 2-1 shows the regional location of the Project site and Figure 2-2 shows the location of the Project site within the surrounding neighborhood.

The Project site is regionally accessible from State Route 126. The Project would be accessed from the north via Edwards Ranch Road (a private road) south of the intersection of Telegraph Road and Olive Road. Todd Road to the east of the Project site and Gaythorne Road, a private road traversing the Project area, would serve as options for off-site secondary access for public safety purposes. Emergency secondary access is proposed to connect to Telegraph Road.

Figure 2-1 Regional Location

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☆ Project Location

● Oxnard-Shoreline Facility

N

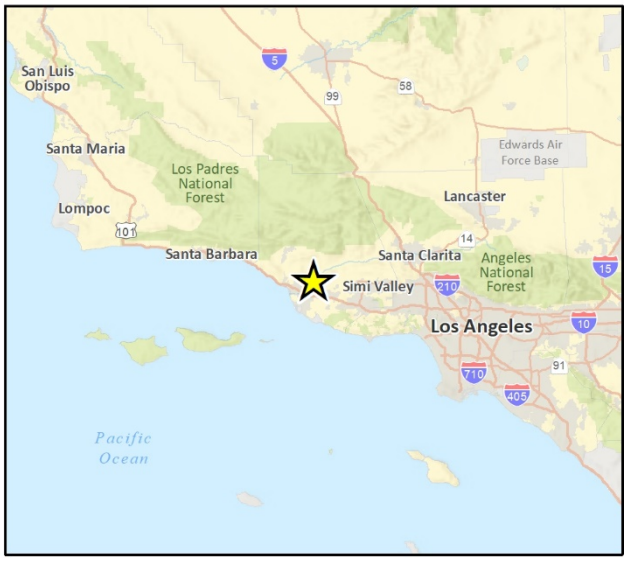

Figure 2-2 Project Site Location

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Fig 2-2 Project Site Location

2.4 Existing Site Characteristics

2.4.1 Existing Land Uses on the Project Site

The Project site is currently occupied by a 15-acre agricultural material composting operation licensed through the California Department of Resources Recycling and Recovery (CalRecycle) under a 2005 Enforcement Agency Notification (Solid Waste Information System [SWIS] #56-AA-0147) with an annual loading of 60,000 tons per year (or an average loading of 164 tons per day). The operation is accessory to agricultural activities performed on-site. The operation receives and processes green materials and wood wastes collected from surrounding agricultural operations on Limoneira properties as well as green material collected by curbside recycling programs from cities within Ventura County and the City of Carpinteria. Material feedstock is received at the site via truck deliveries; truck loads that exceed 1 percent of contaminates are diverted away from the facility. Finished compost and mulch produced at the site is used only in support of Limoneira's surrounding operations; none of the finished compost is used for anything other than agriculture or sold or delivered off-site. Activities conducted at the site include open-air processing and composting of green materials, shredding and screening of materials, placement into large windrows[1] and turning of materials by heavy equipment. Equipment presently operated on the site includes grinders, screeners, loaders, tractors, and an excavator. The volume of agricultural material handled on-site at any one time is less than 12,500 cubic yards with a peak loading of 300 tons per day. The operation was modified in 2015 under Zoning Clearance No. ZC15-0842 which authorized the installation of a weigh scale, an office trailer, two portable toilets, and three sea-cargo containers in support of the facility.

The site is also occupied with orchards and row crops; activities performed on-site include pruning and maintenance of trees, pesticide herbicide application, irrigation system maintenance, and harvesting. Miscellaneous structures on-site include three propane-powered windmills and agricultural accessory and support structures and improvements.

The Project site and surrounding area have a history of oil and gas production beginning in the 1960s. Historic topographic maps and records from the California Geologic Energy Management Division (CalGEM) show nine oil wells and four oil sumps within the shared parcel area. All of the oil wells are abandoned. An idle oil production well (Vintage Projection California, LLC Saticoy Field Edwards 28) and an idle oilfield injection well (Vintage Production California, LLC Edwards 27) are within the Project site. The proposed Project would support access to these wells by the oil company as required by DOGGR.

Existing easements within the Project site include:

- A 100-foot wide Southern Pacific Railroad right-of-way currently owned by the Ventura County Transportation Commission per Instrument No. 95-131252. Crossing has been granted by a private license agreement between the Limoneira Company and the VCTC[2]
- Southern California Edison easements for public utilities and incidental purposes
- An 8-foot-wide easement for petroleum pipelines owned by the Shell Oil Company

[1] Windrow: a row of cut vegetation or compost raked or heaped up to dry before being baled or stored (Merriam-Webster 2020).

[2] The Southern Pacific Railroad was incorrectly referred to as inactive in the Initial Study and, in response to VCTC's comments during the NOP process, this has been addressed and corrected in this EIR. While historically this easement existed in this location, the survey conducted for the Project indicates that the Private License Agreement is lost and the exact location of the permitted crossings cannot be plotted. The Project applicant is aware that there are active train operations along the railroad track and that further development of the property shall be coordinated with VCTC and must be undertaken in accordance with all applicable regulations governing rail lines.

2.4.2 Surrounding Land Uses

The Project site and surrounding properties are predominantly used for agricultural production. The Project site is bordered by agricultural lands on all sides with intermittent residences to the southeast, south, and southwest bordering the Project boundary. The Southern Pacific Railroad right-of-way borders the Project on the northwest, beyond which are agricultural land uses. Historic resources are located in properties surrounding the Project site including the historic Edwards House, a two-story residence located approximately 600 feet to the east of the Project site, the historic Ranch Residence and barn, located less than 100 feet from the southeastern Project site, and the More-Edwards Adobe, a grouping of buildings located approximately 700 feet to the southwest of the Project site.

Table 2-1 describes the zoning and land uses of parcels surrounding the 994-acre Project parcel. To the north and northwest of the Project parcel are agricultural uses. To the northeast are agricultural uses and the Ventura County Jail – Todd Road Facility, which is approximately 0.5 mile east of the Project site but immediately adjacent to the northeastern corner of the Project parcel. The southeastern boundary of the Project parcel is adjacent to oil and gas wells and the Santa Clara River, which is about 750 feet south of the Project site but immediately adjacent to the Project parcel. Agricultural uses interspersed with residences lie to the southwest of the Project parcel until the eastern boundary of the community of Saticoy, which is about 1.4 miles from the Project site and about 0.8 mile from the Project parcel. Figure 2-2 illustrates the surrounding land uses near the Project site.

Table 2-1 Zoning and Land Uses Surrounding the Project Parcel

Adjacent Parcel	Zoning Designation	Zoning Description	Existing Use
Northwest	AE-40ac	Agricultural Exclusive, 40-acre minimum lots size	Agriculture
Northeast	OS-80ac	Open Space, 80-acre minimum lot size	Agriculture
	OS-80ac/MRP	Open Space, 80-acre minimum lot size, Mineral Resource Protection Overlay	Todd Road Jail
Southeast	OS-80ac/MRP	Open Space, 80-acre minimum lot size, Mineral Resource Protection Overlay	Santa Clara River
Southwest	AE-40ac	Agricultural Exclusive, 40-acre minimum lot size	Agriculture with intermittent residences

AE=Agricultural Exclusive; OS=Open Space; MRP = Mineral Resource Protection

Source: County of Ventura 2020

2.4.3 Current Land Use Designation and Zoning

The General Plan land use designation of the Project site is Agricultural (County of Ventura 2020a) and the zoning designation of the site is AE (Agricultural Exclusive), which has a 40-acre minimum lot size (County of Ventura 2020a).

2.5 Project Characteristics

The proposed Project includes a Conditional Use Permit (CUP) and NCZO Text Amendment to permit the expansion of an existing 15-acre agricultural organics processing facility to a new 70-acre

commercial organics processing operation[3], defined in CCR14 Division Chapter 3.1 as a Compostable Material Handling Facility, that would process compostable material, as described in CCR 14 Division 7, delivered to the site and package for sale mulch, compost, and wood chip materials. CCR 14 Division 7 defines a number or compostable materials allowed to be processed at a Compostable Material Handling Facility, including those summarized in the Table 2-1a; for simplicity, compostable material will be referred to as green material and food material in this document. The proposed Project would be a commercial use because it requires a CUP for expansion of a commercial business for sale of agricultural products, but both the existing and proposed use are also accessory to agricultural activities because the finished product generated by the Project (compost) is used for agriculture and because the Project provides a location for green material to be processed/composted without travelling far away from the point of generation.

Table 2-2a Feedstock Definitions for Feedstocks to be Accepted Under the Project

Feedstocks	Description
Agricultural Materials	Waste material of plant or animal origin, which results directly from the conduct of agriculture, animal husbandry, horticulture, aquaculture, silviculture, vermiculture, viticulture and similar activities undertaken for the production of food or fiber for human or animal consumption or use, which is separated at the point of generation, and which contains no other solid waste. With the exception of grape pomace or material generated during nut or grain hulling, shelling, and processing, agricultural material has not been processed except at its point of generation and has not been processed in a way that alters its essential character as a waste resulting from the production of food or fiber for human or animal consumption or use. Material that is defined in this Section 17852 as "food material" or "vegetative food material" is not agricultural material. Agricultural material includes, but is not limited to, manures, orchard and vineyard prunings, grape pumice, and crop residues (14 CCR §17852).
Agricultural By-Product Material	Agricultural By-Product Material means post-harvest agricultural by-products separated at a processing facility. Agricultural By-product Material includes, but is not limited to, solid or semi-solid materials from fruit, nut, cotton, and vegetable processing facilities such as stems, leaves, seeds, nut hulls and shells, peels, and off-grade, over-ripe, or under-ripe produce (14 CCR §17852).
Food Material	A waste material of plant or animal origin that results from the preparation or processing of food for animal or human consumption and that is separated from the municipal solid waste stream. Food material includes, but is not limited to, food waste from food facilities as defined in Health and Safety Code Section 113789 (such as restaurants), food processing establishments as defined in Health and Safety Code section 111955, grocery stores, institutional cafeterias (such as, prisons, schools and hospitals) and residential food scrap collection. Food material does not include any material that is required to be handled only pursuant to the California Food and Agricultural Code and regulations (14 CCR §17852).
Green Material	Any plant material except food material and vegetative food material that is separated at the point of generation, contains no greater than 1.0% of physical contaminants by dry weight, and meets the requirements of section 17868.5. Green material includes, but is not limited to, tree and yard trimmings, untreated wood wastes, natural fiber products, wood waste from silviculture and manufacturing, and construction and demolition wood waste. Green material does not include food material, vegetative food material, biosolids, mixed material, material separated from commingled solid waste collection or processing, wood containing lead-based paint or wood preservative, or mixed construction and demolition debris. Agricultural material, as defined in this section 17852(a) (5), that meets this definition of "green material" may be handled as either agricultural material or green material (14 CCR §17852).

[3] Pursuant to Article 2 of the NCZO, a Commercial Organics Processing Operation is defined "(a)n organics processing operation that includes the sale or off-site distribution of the product produced. Does not include the processing of mixed solid waste or Biosolids or On-Site Composting Operations. Those operations which have up to 200 cubic yards of any combination of separated feedstock, actively decomposing compost, or stabilized compost on-site at any one time are Small-Scale, and those with up to 1,000 cubic yards are Medium-Scale, and those with over 1,000 cubic yards are Large-Scale."

Feedstocks	Description
Mixed Material	Any compostable material that is part of the municipal solid waste stream, and is mixed with or contains non-organics, processed industrial materials, mixed demolition or mixed construction debris, or plastics. A feedstock that is not source separated or contains 1.0% or more of physical contaminants by dry weight is mixed material (14 CCR § 17852).
Vegetative Food Material	"Vegetative Food Material" means that fraction of food material, defined above, that is a plant material and is separated from other food material and the municipal solid waste stream. Vegetative food material may be processed or cooked but must otherwise retain its essential natural character and no salts, preservatives, fats or oils, or adulterants shall have been added. Vegetative food material includes, but is not limited to, fruits and vegetables, edible flowers and plants, outdated and spoiled produce, and coffee grounds. Vegetative food material contains no greater than 1.0 percent of physical contaminants by dry weight and meets the requirements of Section 17868.5.
Digestate	The solid and/or liquid residual material remaining after organic material has been processed in an in-vessel digester, as defined in Section 17896.2(a)(14). Digestate intended to be composted pursuant to this Chapter may only be handled at a facility that has obtained a Compostable Materials Handling Facility Permit pursuant to Section 17854.
Organic Wastes	"Organic waste" means solid wastes containing material originated from living organisms and their metabolic waste products including, but not limited to, food, green material, landscape and pruning waste, organic textiles and carpets, lumber, wood, paper products, printing and writing paper, manure, biosolids, digestate, and sludges (14 CCR § 18982) (SB 1383).
Pre-processed feedstock ready CASP materials	Some organic material may be delivered pre-processed and feedstock-ready from local material recovery facilities and may be deposited directly into the covered aerated static pile (CASP) unit without further processing.

Source: Agromin

The proposed Project would utilize a combination of open windrows, Covered Aerated Static Piles (CASPs), and AD systems to process organic materials into saleable compost and mulch products. The NCZO Text Amendment proposes to amend Section 8107-36.4.1(a), Standards Relating to Organics Processing Operations (Includes Biosolids, Composting, Vermicomposting, and Chipping and Grinding).

The expansion of the existing 15-acre agricultural organics processing operation to the proposed commercial organics processing facility would result in the removal of 55 acres of existing citrus orchard. Additionally, three propane-powered windmills would be removed as part of the orchard removal. This section includes a detailed discussion of the proposed Project. Table 2-2 summarizes the general characteristics of the Project.

2.5.1 Buildings

The proposed Project would include the construction of six new structures as summarized in Table 2-3. Figure 2-3 shows the site plan of the proposed composting facility, and Figure 2-4a through Figure 2-4d show the typical elevations of the proposed buildings.

Table 2-3 Project Characteristics

Address	Terminus of Edwards Ranch Road
Assessor's Parcel Number (APN)	090-0-180-085 (project site is on 70 acres of the 994-acre parcel)
Height/Stories	Facility Administration Building: Two-story, 35 ft. in height Maintenance Building: Single-story, 33 ft. in height Production/Packaging Building: Single-story, 33 ft. in height Wet Organics Building: Single-story, 33 ft. in height Dry Organics Building: Single-story, 33 ft. in height
Project Area	70 acres
Proposed Building Footprint	Approximately 230,779 sq. ft.
Facility Administration Building	7,022 sq. ft. (first floor) 6,494 sq. ft. (second floor)
Scale House	13,800 sq. ft.
Maintenance Building	25,000 sq. ft.
Production/Packaging Building	23,107 sq. ft.
Wet Organics Building	80,925 sq. ft.
Dry Organics Building	80,925 sq. ft.
Land Uses	
Buildings and Associated Parking Lots	230,779 sq. ft.
Retention Basins (2)	243,936 sq. ft.
Landscaping Area	223,350 sq. ft.
Utility Pad	31,900 sq. ft.
Green/Wood/Ag. Feedstock	36,250 sq. ft.
AD Units (4)	Approximately 40,000 sq. ft.
CASP Units (2)[1]	Approximately 74,450 sq. ft.
Open Windrow Composting Piles[1]	Approximately 806,433 sq. ft.

[1] CASP Units and Open Windrow Composting Piles areas were estimated based off best available data in the Site Plans (Harrison Industries 2018). No exact measurements are available.

sq. ft. = square feet; ft. = feet; Ag. = Agriculture; AD = Anerobic Digestion; CASP = Covered Aerated Static Pile

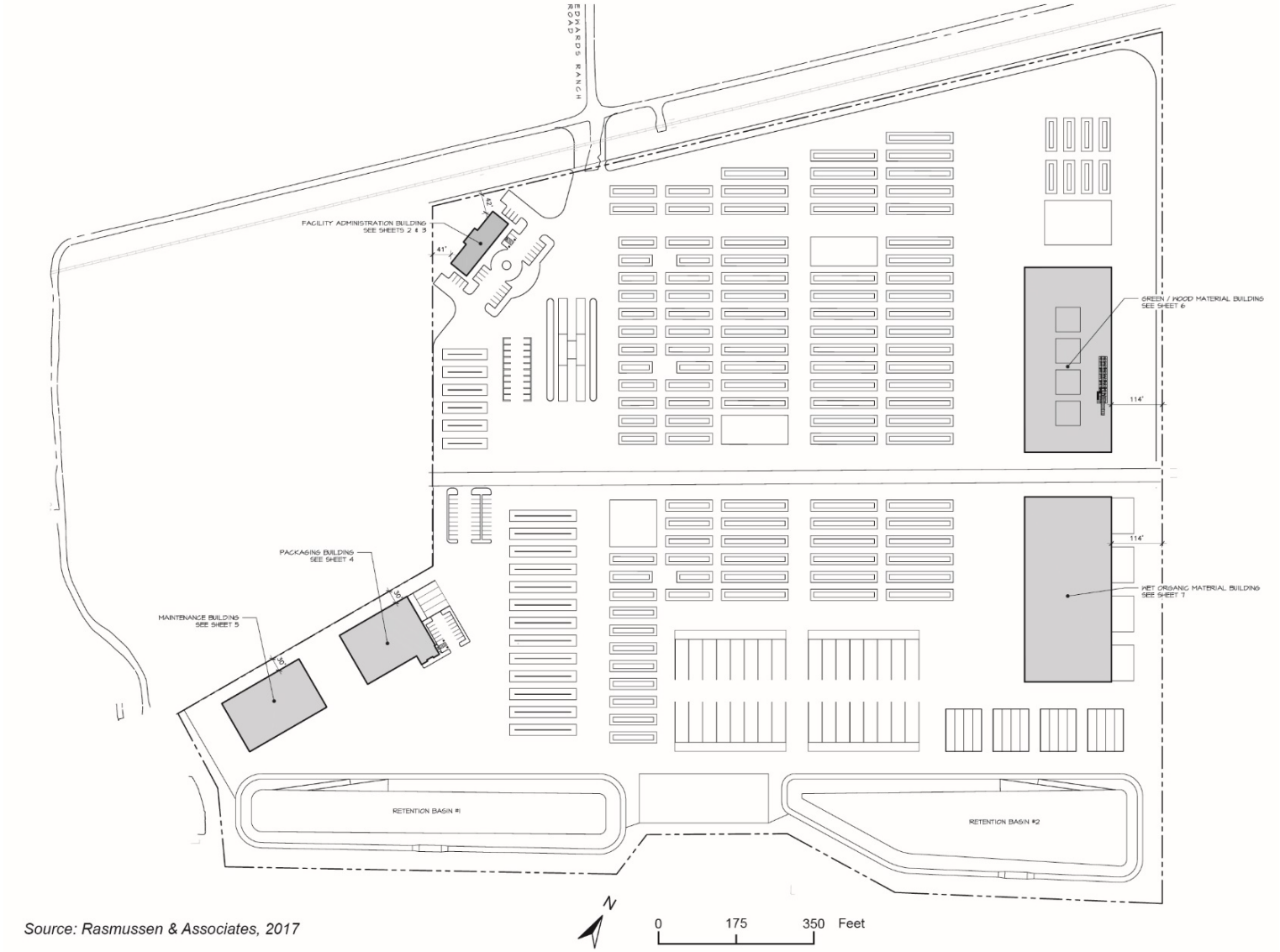
Source: Harrison Industries 2018

Table 2-4 Building Coverage

Structure	Building Coverage (sq. ft.)	Building Description
Facility Administration Building	7,022	The Facility Administration Building would be approximately 13,516 sq. ft., two stories, sq. ft. and 35 ft. in height. The building would include two classrooms, 14 office spaces, a conference room, and four restrooms. There would be 25 standard parking spaces and two handicap accessible spaces adjacent to the building.
Scale House	13,800	A scale house (unenclosed area of 12,500 sq. ft.) with two scales would be located just south of the Facility Administration Building along the alignment of Edwards Ranch Road.
Maintenance Building	25,000	The Maintenance Building would be approximately 25,000 sq. ft. and 33 ft. in height. The building would have an open interior for repair and maintenance activities associated with the on-site processing equipment, on-site mobile equipment, and company-owned delivery vehicles.
Production/Packaging Building	23,107	The Production/Packaging Building would be approximately 23,107 sq. ft. and 33 ft. in height. The building would include the main packaging floor, five offices, a break room, a conference room, and two restrooms. There would be 11 standard parking spaces and two handicap accessible spaces for employees adjacent to this building. There would be another 30 standard spaces in a separate area just north of this building. In addition to employee parking, the production/packaging facility would include four loading docks.
Wet Organics Building	80,925	The Wet Organics Building (food material) would be approximately 80,925 sq. ft. and 33 ft. in height. The building would include an internal break room and two full restrooms with the remainder of the structure open to house processing equipment and piles. The wet organics building would be fully enclosed with air ventilated through four biofilters to control volatile organics and odor emissions.
Dry Organics Building	80,925	The Dry Organics Building (green material) would be approximately 80,925 sq. ft. and 33 ft. in height. The building would be a partially open structure with no internal rooms that would house various pieces of processing equipment. The dry organics building would have a roof canopy and open sides.
Total Building Coverage	**230,779**	
Net Building Coverage Percentage of Project Site	**7.6**	

sq. ft. = square feet

Figure 2-3 Project Site Plan

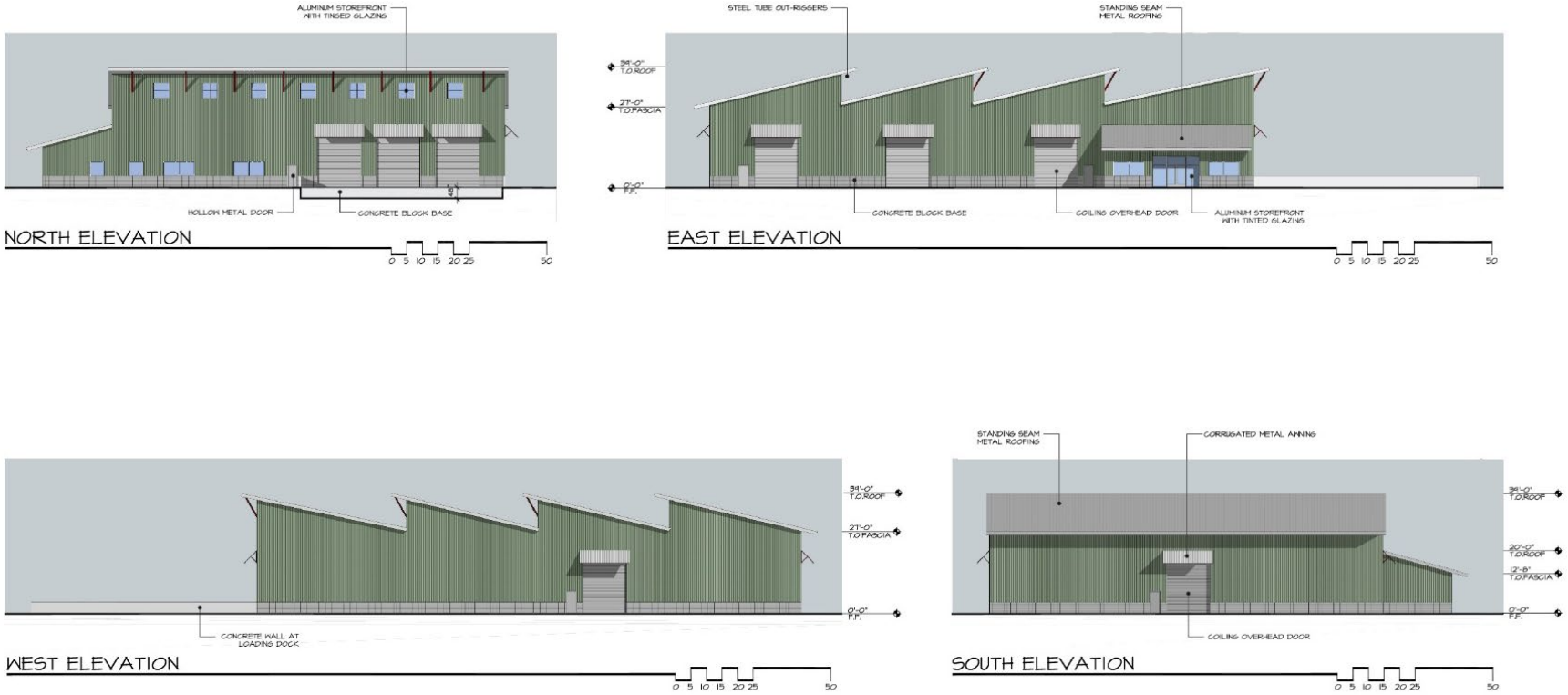


Source: Rasmussen & Associates, 2017

Figure 2-4a Facility Administration Building Elevation

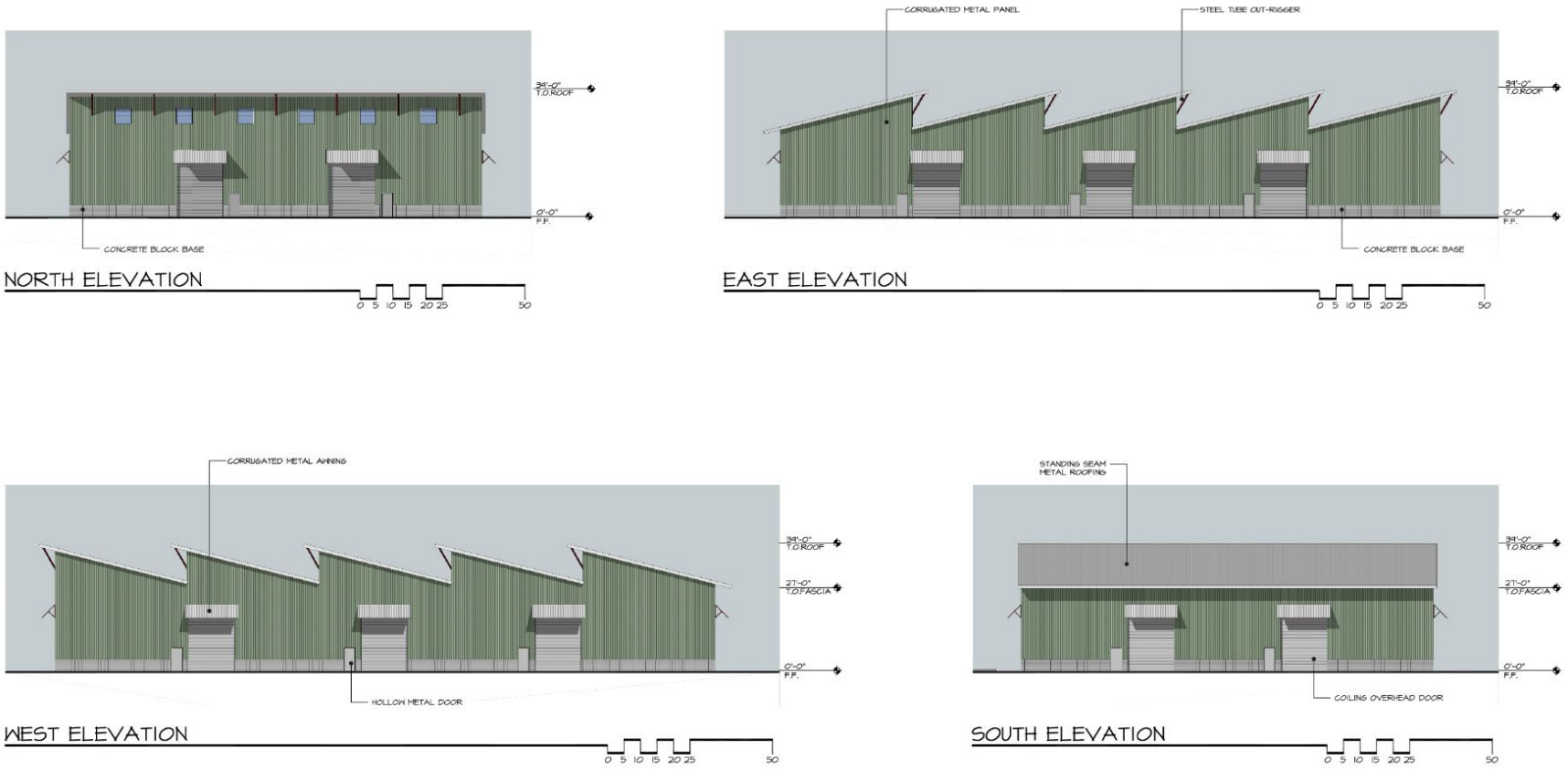
Source: Rasmussen & Associates, 2017

Figure 2-4b Production/Packaging Building Elevation



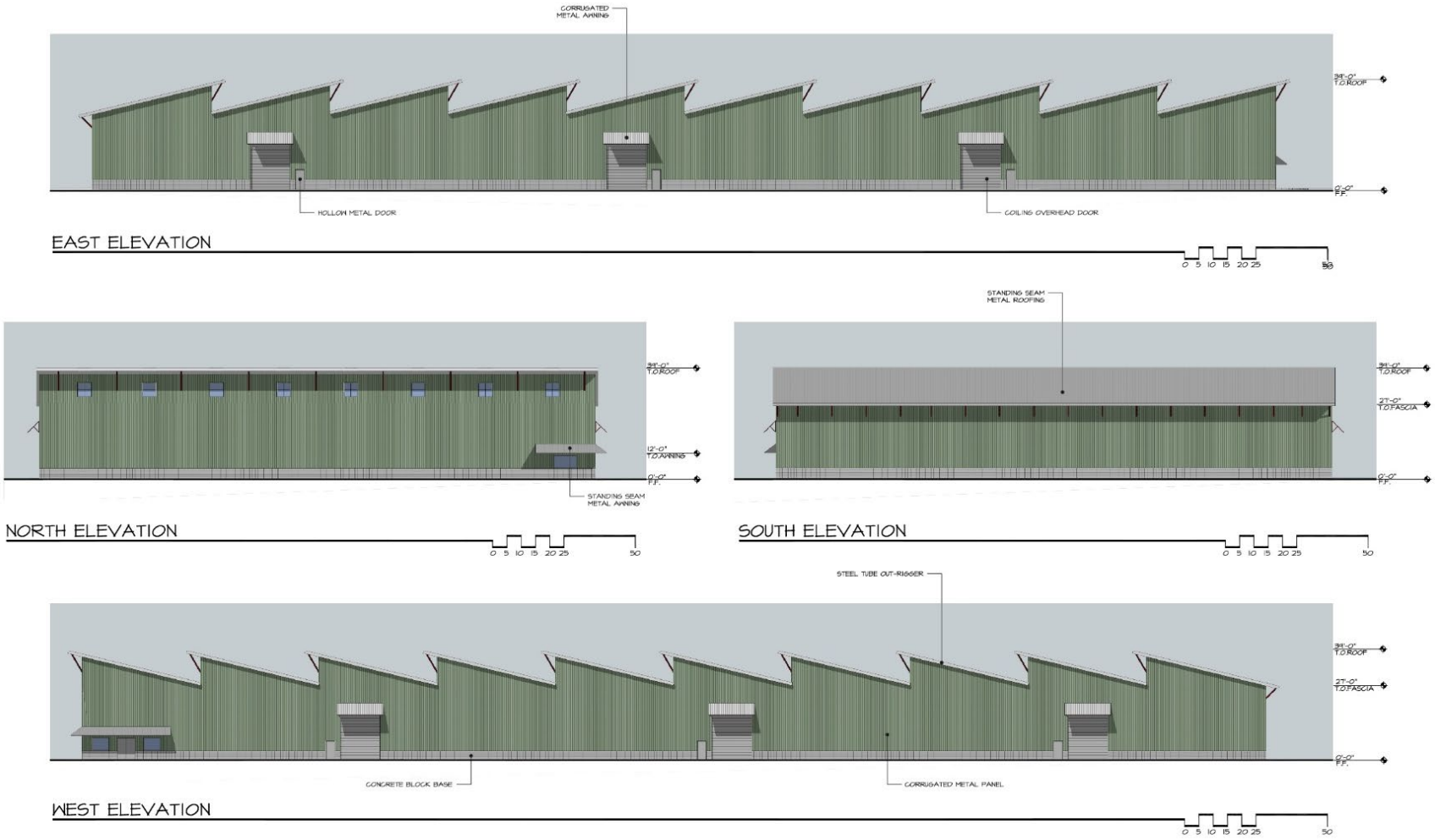
Source: Rasmussen & Associates, 2017

Figure 2-4c Dry Material Building Elevation



Source: Rasmussen & Associates, 2017

Figure 2-4d Wet Organics Building Elevation



Source: Rasmussen & Associates, 2017

2.5.2 Operational Components

Incoming green and food waste materials would be unloaded, processed, screened, and sorted inside the wet and dry process buildings and the outdoor processing pad. The Dry Organics Building would process green/woody materials while the Wet Organics Building would process food and other potentially odorous materials. The outdoor processing pad would accept agricultural, green and wood waste for storage and processing, and no food waste would be allowed. Both buildings would accommodate tipping areas for the delivery of organic material, trommel screens (pre-screens), picking conveyors with magnets to remove ferrous metals, and grinders. The Wet Organics Building would have a bio-separator that would produce a food slurry which is used as either a compost feedstock or sent to an off-site organics processor. The Wet Organics Building would also include a blending pad, where bulking agents (i.e., green material) would be added to processed food material/food slurry as needed prior to composting in Anaerobic Digestors (ADs) or Covered Aerated Static Piles (CASPs).

A 40,000-ton per year AD system would produce high-quality compost and methane-rich biogas. The biomethane generated by the Project would be used to fuel an internal combustion combined heat and power engine which would generate electrical power that would be used to serve facility operations. The AD system is a "dry" system comprised of four individual four-bay AD units. Each four-bay AD unit would include an approximately 3,600 sq. ft. concrete pad, four prefabricated steel insulated tunnels (each 12-ft. by 40-ft. in area and 12 ft. in height), an above ground percolate tank (12-ft. by 48-ft. in area and 10 ft. in height) with two subsurface sumps used to collect percolate and pump percolate to and from the percolate tank, a mechanical electrical container, a packaged roof mounted bio-filter and a rubber external biogas storage bladder.

A 75,000-ton per year CASP system would aerobically decompose green and food organic materials into useable compost at the Project site. The CASP system would incorporate emission controls such as a multi-layer laminate cover that can achieve up to 97 percent reduction in odor concentrations. The CASP system would be comprised of two groups of eight individual CASP units, totaling 16 CASPs.

Open windrow composting of organics (green material) would continue and be expanded by the Project. Similar to existing practice, active, aerobic composting of green materials would occur in long, narrow uncovered piles.

Once constructed, the proposed Project would process an estimated annual average of approximately 295,000 tons per year of green material and food material using a combination of composting processes described above. Daily average waste receiving would be 945 tons per day (based on 6 days per week schedule) while peak could reach 1,250 tons per day. Feedstock material would be collected from various residential and commercial sources throughout Ventura County as well as the City of Carpinteria and delivered via haul trucks to the Project for processing. The Project would also receive additional feedstocks from self-haulers (e.g., landscapers, contractors, residents) as well as shipments of soil amendment products (e.g., peat moss, gypsum, mulch, etc.), which would be blended with compost to produce specialty organic products.

The Production/Packaging Building would include a bagging operation where mulch, woodchips, and compost products would be bagged or weighed in bulk for sale to the public. Soil amendments, such as gypsum, peat moss, and perlite, would be added to finished compost material and placed on a conveyor that feeds an electric-powered bagging system. Finished compost products would be blended with amendments to customer specifications on a mixing pad adjacent to the

Production/Packaging Building and stockpiled before being either sold on-site in bulk to the public or transported off-site for sale to retail outlets throughout the County by company-owned vehicles. Newer and cleaner emission off-road equipment is proposed for on-site use.

Amount and Storage Time of Materials Stored On-Site

Table 2-3a summarizes the estimated on-site storage volumes of material:

Table 2-3a: Onsite Material Storage Volumes

Material Stored	On-Site Storage Quantity (Cubic yards)	Comments
Green material feedstock for windrows	12,000	Normally up to 2 days storage before processing. 7 days maximum.
Food & green material feed stock for AD & CASP	0	Will be processed and sent directly to AD and CASPs. No Storage will occur
In process green material in windrows	108,000	Up to 90 days retention time in windrows. Average closer to 65 days due to mulch production.
Finished product storage	15,000	Pursuant to NCZO Section 8107-36.4 (p) all products must be sold, given away, or beneficially used within 24 months of the facility's acceptance of the raw material.
In process food & green material in ADs	7,600	21 days retention time in AD, 22-day total cycle time
In process food & green material in CASPs	10,400	21 days retention time in CASP, 22-day total cycle time
Total cubic yards:	**153,000**	

Source: County of Ventura 2021

On average, it takes roughly 90 days from the time feedstock enters the facility until it is transported offsite as final product. Pursuant to NCZO Section 8107-63.4 (p), feedstock materials shall not be accepted at any time when the storage capacity of the site would be exceeded by such delivery.

2.5.3 Employees and Hours of Operation

The existing composting operation currently has 11 full-time employees. The proposed Project would increase the total number of full-time equivalent employees to 37 (a net increase of 26 new employees), as shown in Table 2-4 below. Table 2-4 shows a normal operating schedule as well as a peak schedule for days when demand is high, typically in spring and summer. No employees would reside on the Project site.

Table 2-4 Project Employees

Operation	Employees	Employee Shift	Shifts per Day	Days per Week
Material Receiving	4	7:00 AM to 5:00 PM	1	Monday through Saturday
Peak season	4	6:00 AM to 6:00 PM	1	Monday through Saturday
Material Processing Buildings	10	6:00 AM to 4:00 PM	1	Monday through Saturday
Peak season	10	6:00 AM to 6:00 PM	1	Monday through Saturday
Packaging Building	5	6:00 AM to 4:00 PM	1	Monday through Saturday
Peak season	5	6:00 AM to 6:00 PM	1	Monday through Saturday
Maintenance	4	7:00 AM to 5:00 PM	1	Monday through Saturday
Peak season	4	6:00 AM to 6:00 PM	1	Monday through Saturday
Outdoor Processing	4	sunrise to sunset	1	Monday through Saturday (with remote monitoring for Sunday)
Office	10	7:00 AM to 5:00 PM	1	Monday through Friday
Peak season	10	6:00 AM to 6:00 PM	1	Monday through Friday
Total	**37**			
Current Site Employees	-11			
New Employees	26			

Source: County of Ventura 2019

2.5.4 Utilities

Water would be provided by the City of Santa Paula via a new service connection from an existing City water line to the Ventura County Jail at Todd Road to the east (see Figure 2-2). The proposed water line would connect to the proposed utilities pad located in the southeast area of the Project site. The water line would be installed off-site, just outside of the Project site boundary, but within the Project parcel. The new water line would serve as the primary water supply for the proposed Project. The existing water line for current operations at the Project site is an 8-inch line connected to a Limoneira-owned water well located approximately 4,000 feet northeast of the Project site. This water line runs from the well to a 10,000-gallon water tank located at the north side of the existing operation. Other water lines run from there to other tanks on the site. The proposed water line would be 12 inches in diameter, run along the southeastern Project boundary on Roger Road, northwest along a private right-of-way, and then east along Gaythorne Road. The proposed water line would be placed within existing rights-of-way such as driveways and dirt roads. The proposed line is required to accommodate project water demand but is designed to service only the proposed Project and not accommodate additional growth throughout the County. Information surrounding the proposed new water line was not available at the time of the Initial Study and thus not included in previous reports. However, because the water line would be built in previously disturbed areas and is being upsized to serve only the proposed Project, the improvement would not result in additional impacts beyond those examined in the Initial Study and has therefore been analyzed in this EIR, not through revisions to the Initial Study.

On March 22, 2018, the City of Santa Paula issued a Water Will Serve Letter for the proposed Project, confirming the availability of water supply (Attachment 7 of the Initial Study [Appendix A]). In addition, the proposed operation would capture and store rainwater within the proposed retention basin system to supplement composting operational water needs. On-site water storage would be located on the southern boundary of the site and would include a 50,000-gallon domestic

water tank, a 120,000-gallon operations water tank, and three 120,000-gallon fire water storage tanks.

The proposed Project also would include installation of multiple on-site wastewater treatment systems (OWTS) septic systems. The proposed OWTS would include one 4,000-gallon septic tank for the Administration Building, one 2,500-gallon septic tank for the Production Building, one 2,500-gallon septic tank for the Maintenance Building, one 2,000-gallon septic tank for the Green Materials Processing Building, and one 2,000-gallon septic tank for the Wet Organics Processing Building. Wastewater would be pumped via well pumps and dosing tanks to the leach lines at the northeast portion of the Project site.

The Project site is currently served by existing electrical facilities provided by Southern California Edison and communication facilities. The proposed Project would utilize propane tanks; therefore, a natural gas service line connection would not be required.

2.5.5 Landscaping, Stormwater Detention, and Hardscaping

The Project is designed to capture and prevent any surface water runoff from the site. Through a combination of site grading and a subsurface drain system, stormwater runoff from working surfaces would be directed to two water drainage retention basins totaling 5.6 acres in area with approximately 43.5 acre-ft. total storage capacity. These retention basins would be located on the south (down gradient) edge of the Project site. As required by the California State Water Resources Control Board General Waste Discharge Requirements (WDR) for Composting Operations (Order WQ 2016-0121-DWQ), the site has been designed to contain runoff from a 25-year, 24-hour storm event within the water retention basins.

The Project site would be surrounded by a landscaping buffer measuring approximately 15-feet-wide along the northwestern, southeastern, and southwestern borders, while the existing eucalyptus row along the northeastern border would remain in place[4]. Additional trees and shrubs would surround the Facility Administrative Building and associated parking lot, as well as the parking lot adjacent to the Packaging Building (see Section 2.5.6, *Vehicular Access and Parking*, for parking information). Proposed trees would include red iron bark (*Eucalyptus sideroxylon*), Afghan pine (*Pinus eldarica*), palo verde tree (*Prosopis* 'desert museum'), Australian willow (*Geijera parviflora*), silver dollar (*Eucalyptus polyanthemos*), coast live oak (*Quercus agrifolia*), Canary Island Pine (*Pinus canariensis*), and red flowering gum (*Corymbia ficifolia*). Proposed shrubs would include acacia (*Acacia* spp.), lemonade berry (*Rhus integrifolia*), toyon (*Heteromeles arbutifolia*), yellow lantana (*Lantana* 'yellow'), oleander (*Nerium oleander*), tree aloe (*Aloe arborescens*), giant wild rye (*Leymus* 'canyon prince'), yarrow (*Achillea* spp.), purple hopseed (*Dodonea* v. '*purpurea*'), and New Zealand Christmas tree (*Metrosideros* c. 'springfire'). An agricultural buffer would also exist along the northwestern and southwestern boundaries near the Facility Administrative Building beyond the chain-link fence surrounding the property.

2.5.6 Vehicular Access and Parking

As shown in Figure 2-2, the Project would be accessible from the north via Edwards Ranch Road, a private road which connects the site to Telegraph Road, located 3,600 feet north of the Project entrance. Traffic would access Edwards Ranch Road primarily from Telegraph Road. The site would

[4] The proposed modified buffer differs from distances prescribed by the Office of Ventura County Agricultural Commissioner under the Agricultural/Urban Buffer Policy (Revised 7/19/06); review of the final landscape plan is subject to the review and approval by the Agricultural Policy Advisory Committee (APAC) as prescribed under Mitigation Measures AG-2.

not be accessed from Todd Road or Gaythorne Road (private) east of the property. Secondary all-weather access, as required by the Ventura County Fire Protection District (VCFPD), is proposed along a 24-foot-wide unnamed access road that would provide a second emergency connection to Telegraph Road, approximately 1,000 feet west of the intersection of Edwards Ranch Road and Telegraph Road. This road would be constructed in accordance with Fire District Standard 501 and be a certified all-weather base material. The road would provide free egress at all times for the site occupants.

The proposed Project would include a total of 66 standard parking spaces and four Americans with Disabilities (ADA)-accessible parking spaces. Parking lots would be located at the Facility Administration Building and at and just north of the Production/Packaging Building.

2.5.7 Off-Site Improvements

The Project would require road improvements at the intersection of Telegraph Road and Edwards Ranch Road, including lengthening of the existing left-turn pocket to 150 feet and constructing a new 150-foot long right-turn pocket along Telegraph Road. In addition, a 12-foot-wide eastbound right-turn lane would be constructed along Telegraph Road at the intersection of Telegraph Road and Edwards Ranch Road. The Project would require pavement widening, utility relocation, and removal of the existing palm tree at the southeast corner of the Telegraph Road and Edwards Ranch Road intersection to accommodate movement of large trucks and their associated turn radii. The Project would also include the installation of white stop bar striping on northbound Edwards Ranch Road and Telegraph Road, removal and replacement of existing stop sign and pole at Edwards Ranch Road to meet current standards, and relocating power poles where necessary.

As mentioned under 2.5.1.3, *Utilities*, a proposed 12-inch in diameter water line would be built within a previously disturbed area of the parcel to service the Project.

2.5.8 Construction

The proposed Project is expected to be constructed in phases beginning at the end of 2021. The phased development plan would utilize modular technology components that can be deployed in phases and integrated into the Project, allowing phased capital outlay and development flexibility based upon market and regulatory changes. Currently, the anticipated phasing would be as follows:

- Phase 1 – Partial Construction of Green Processing Infrastructure, with completion in late 2022 to late 2023
  - Construct intersection improvements at Telegraph Road
  - Other access upgrades and on-site road improvements
  - Landscaping
  - Site grading, construction of drainage basins
  - Partial construction of impermeable windrow pads
  - Partial build out of the open windrow composting operation
  - Build Scale House
  - Utility infrastructure as needed
- Phase 2 – Remaining Construction of Green Processing Infrastructure, timing as demand requires
  - Construct impermeable windrow pads

- Additional buildout of the open windrow composting operation
- Construct the Dry Organics Receiving Building for green material
- Utility infrastructure as needed

- Phase 3 – Construction of Food Material Processing Infrastructure, timing as demand requires
  - Construct the Wet Organics Receiving building for food material
  - Construct the CASP system
  - Construct the AD system
  - Construct the Packaging/Production Building, and the Maintenance Building
  - Utility infrastructure as needed
- Phase 4 – Construction of the Administration Building
  - Construct the Facility Administration Building
  - Utility infrastructure as needed

2.5.9 Oxnard-Shoreline Facility

Agromin currently also carries out composting operations at its existing, 11-acre Oxnard-Shoreline facility, located at 6859 Arnold Road in Oxnard, California. A CUP for continued operation of this facility through December 31, 2030 is currently pending approval. Existing composting operations at the Oxnard-Shoreline facility include windrow composting, preprocessing and grinding, bagging and bulk sales, and mobile and stationary processing equipment. These operations would continue at the facility if the pending CUP is approved. The Oxnard-Shoreline facility does not accept food waste. If the proposed Project is approved, food waste would be sent to the Project site for processing, not the Oxnard-Shoreline facility. The proposed Project would therefore only accommodate any expansion in non-food greenwaste from the Oxnard-Shoreline facility beyond what could be accommodated under its existing CUP and the proposed CUP extension if that is approved.

2.5.10 Non-Coastal Zoning Ordinance Text Amendment

Pursuant to NCZO Section 8107-36.4.1(a), no organics processing operations, other than those accessory to agricultural activities and on-site composting operations, shall be located in the AE (Agricultural Exclusive) zone on land designated as Prime Farmland. The subject property is zoned AE and located on designated Prime Farmland soils (see Section 4.1, *Agricultural Resources – Soils*, for more information on Prime Farmland conversion). A text amendment to the NCZO is proposed as part of the Project to permit the proposed commercial organics processing use on the subject property. The proposed text amendment to NCZO Section 8107-36.4.1(a) is shown below in legislative format (deleted text in strikethrough, and added text underlined):

Sec. 8107-36.4.1 - General Standards

The following standards shall apply to all organics processing operations, and vermiculture operations with over 5,000 square feet of open beds:

a) No organics processing operation, other than those accessory to agricultural activities and on-site composting operations, shall be located in the AE (Agricultural Exclusive) zone on land designated as "Prime", "Statewide Importance", "Unique" or "Local Importance", on the California Department of Conservation's Farmland Mapping and Monitoring program, Important Farmlands Maps~~, or on land subject to a Land Conservation Act (LCA) contract,~~

~~unless the Planning Director, in consultation with the Agricultural Commissioner, determines that the land is developed or otherwise unsuitable for agricultural activities.~~ unless it meets one of the following criteria:

1. The Planning Director, in consultation with the Agricultural Commissioner, determines that the land upon which the organics processing operation would be located is developed or otherwise unsuitable for agricultural use;
2. The organics processing operation is a commercial organics processing operation that meets all of the following criteria:
   i. Development of the commercial organics processing operation will not result, when combined with all other commercial organics processing operations, in the cumulative loss in the unincorporated area of more than 200 acres of AE zoned land designated as "Prime", "Statewide Importance", "Unique" or "Local Importance" on the California Department of Conservation's Farmland Mapping and Monitoring Program, Important Farmland Maps.
   ii. At least 60 percent of the finished products generated by the commercial organics processing operation are used for an agricultural use or an agricultural accessory use in Ventura County, the City of Carpinteria or outside the State of California.
   iii. All feedstock used to generate the finished products are generated and collected from Ventura County and the City of Carpinteria;
   iv. The maximum size of a commercial organics processing operation is not larger than 100 acres; and
   v. The applicant demonstrates that all terms and conditions of an applicable Land Conservation Act (LCA) contract will be maintained if a commercial organics processing operation is located on land subject to an LCA contract. The applicant must also demonstrate compliance with the California Land Conservation Act of 1965, Sections 51200 et seq. of the California Government Code and the Williamson Act.
   vi. Upon completion of the commercial organics processing operation, the site is returned to its condition as existing prior to development of the operation.

2.6 Project Objectives

- Produce and provide local and regional agricultural and nursery customers with high-quality composted products
- Assist in meeting California's greenhouse gas (GHG) reduction goals of Assembly Bill (AB) 32 and AB 1826. Although GHG emissions are created by the composting process, these are outweighed by the avoided uncontrolled GHG emissions associated with landfills[4]
- Assist in meeting the landfill diversion goals in AB 939, AB 341, Senate Bill (SB) 1383 as well as meeting the SB 1383 procurement requirements for jurisdictions (including the County of

[4] According to the U.S. Environmental Protection Agency's Landfill Methane Outreach Program, landfill gas is comprised of roughly 50 percent carbon dioxide and 50 percent methane. Whereas a compost pile decomposes aerobically – with oxygen – producing mainly carbon dioxide. The project would also capture biomethane generated through the AD process and produce renewable Compressed Natural Gas, further reducing methane emissions from composting operations. Methane is a potent GHG, 28 to 36 times more effective than carbon dioxide at trapping heat in the atmosphere over a 100-year period and therefore is more devastating to the climate. Please see the following link for more information: https://www.epa.gov/lmop/basic-information-about-landfill-gas#:~:text=LFG%20is%20extracted%20from%20landfills,in%20an%20LFG%20energy%20project.

Ventura) as found in California Code of Regulations (CCR) 14 Section 18993.1 (adopted July 2020)

- Produce carbon-negative fuel: The AB 32 Low Carbon Fuel Standard calls for a statewide 10 percent fuel intensity reduction by 2020. The renewable Compressed Natural Gas (CNG) to be produced by the Project's dry AD facility will assist California in meeting that goal. Biomethane generated from the AD of food material and green material has been determined by the California Air Resources Board (CARB) to be carbon negative
- Facilitate waste diversion and landfill space conservation through green material and food material composting
- Provide a convenient, environmentally compliant, and cost-effective facility for the recycling of food material, green material, and other organic materials
- Promote public awareness of the benefits of recycling organics through public outreach programs
- Stimulate employment opportunities in the County of Ventura by adding additional employees at the site[5], and through the operator's ongoing efforts to increase the use of organic products by farmers, landscape companies, golf courses, parks departments, and other similar users of such products

2.7 Required Approvals

The proposed Project would require the discretionary approval of the County of Ventura. Pursuant to NCZO (§§8181-3.2 and 8115-3 et seq.), applications for Board of Supervisors-approved CUP shall first be reviewed by the Planning Commission and the Planning Commission shall forward NCZO text amendments to the Board of Supervisors for approval. Other agency approval or permits would be required from the following:

- Los Angeles Regional Water Quality Control Board (RWQCB)
- California Department of Resources Recycling and Recovery (CalRecycle)
- California Department of Fish and Wildlife
- County of Ventura, Resource Management Agency – Environmental Health Division
- Ventura Local Agency Formation Commission
- Ventura County Transportation Commission
- California Public Utilities Commission
- Ventura County Air Pollution Control District

[5] Pursuant to communication received from the applicant's representative, the Project will only result in a net gain of 26 new employees based on the projection of a total of 37 site employees and subtracting the existing 11 employees presently working at the site.

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed Project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The Project site is located in the unincorporated area of Ventura County, approximately 5 miles southwest of the city of Santa Paula. The 70-acre Project site is located at the terminus of Edwards Ranch Road, south of SR 126 on a parcel with Assessor's Parcel Number (APN) 090-0-180-085. The parcel is part of a larger 994-acre subdivided lot.

Nearby major roadways include Todd Road, Wells Road, Telegraph Road, Briggs Road, and Edwards Ranch Road. The closest freeway is SR 126 (Santa Paula Freeway), which is located 0.25 mile north of the Project site.

The Project site is located approximately 9 miles inland from the Pacific Ocean. The climate and the coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months. Although air quality in the area has steadily improved in recent years, the region is identified as being in nonattainment for ozone (smog) and particulate matter less than 10 microns in diameter (PM_{10}).

3.2 Project Site Setting

As shown in Figure 2-2 in Section 2, *Project Description,* the Project site and surrounding properties are predominantly used for agricultural production. The Project site is bordered by agricultural lands to the northwest, north, and east. The southeastern boundary is bordered by oil and gas wells. The project site is accessible from the intersection of Telegraph Road and Olive Road south to Edwards Ranch Road (a private road) and crossing at the Southern Pacific Railroad right-of-way.

Fifteen acres of the 70-acre project site is currently used for an agricultural composting facility. The remainder of the Project site includes lemon orchards, three propane-powered windmills, and oil and gas wells. The Project site has a General Plan land use designation of Agricultural and a zoning designation of Agricultural Exclusive (AE). The purpose of the AE designation is to preserve and protect agriculture and commercial agricultural lands. The proposed project includes a CUP and NCZO Text Amendment to permit the expansion of an existing 15-acre agricultural organics processing facility to a new 70-acre commercial organics processing operation that would process food and green material delivered to the site and package-for-sale mulch, compost, and wood chip materials.

3.3 Cumulative Development

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the proposed project. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or could compound other environmental impacts. Cumulative impacts are the combined changes in the environment that

result from the incremental impact of development of the proposed project and other nearby projects. For example, noise impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Currently planned and pending projects in the unincorporated areas of Ventura County and surrounding areas, including the city of Santa Paula, are listed in Table 3-1. The locations of the cumulative projects are shown on Figure 3-1. These projects are considered in the cumulative analyses in Section 4, *Environmental Impact Analysis*.

Table 3-1 Cumulative Projects List

Project No.[1]	Permit No.	Permit Type	Description	Status
City of Santa Paula				
1	18-CDP-03	Mixed Use	Convert second floor offices to six new apartments in downtown retail building, and remodel ground floor commercial unit.	Pending
2	13-CDP-09	Airpark Specific Plan	Twelve new buildings comprising 37 units for airport residential and/or aviation-related businesses.	Approved
3	13-CDP-04	SP Business Park West	Santa Paula West Specific Plan. The specific plan would guide future land use development on approximately 53.81 acres of the city's 125-acre West Area 2 designation. The land uses envisioned within the specific plan would be a mix of low-intensity industrial (such as light manufacturing or research and development), professional offices, and supporting commercial businesses.	Approved
4	12-CDP-05	Industrial	Unfinished and incomplete Industrial Park.	Pending
5	20-CP-01	Commercial	New 5-megawatt (MW) battery storage facility, solar charged, ties into Southern California Edison (SCE) grid. Phase 2 will expand the facility to 20 MW.	Approved
6	17-CDP-04	Industrial	New heavy equipment storage yard.	Approved
7	15-CDP-06	Industrial	New 52,000-sf factory for specialty pipe manufacturing.	Approved
8	20-CUP-10	Commercial	Banquet hall and event center conversion from existing retail (furniture) store in Central Business District.	Approved
9	18-CUP-02	Commercial	New hard cider taproom, outdoor patio, and production facility in Central Business District.	Approved
10	18-DR-09	Commercial	New restaurant.	Pending
11	18-CDP-04	Commercial	New 30,000 sf commercial development: 20,000-sf medical office building, 10,000-sf educational building, and 148 parking spaces.	Approved
12	18-CDP-01	Commercial	New self-storage facility with rental office. Increase Floor to Area Ratio from 0.25 to 0.345.	Approved
13	19-DR-09	Institutional	New classroom building to replace approximately 60-year-old modular ("temporary") classroom facilities.	Pending

Project No.[1]	Permit No.	Permit Type	Description	Status
14	19-CI-07/PC C-5367	Institutional	New 50-foot-tall wireless telecommunications facility to support municipal water oversight, operations, and management.	Pending
15	19-CUP-05	Industrial	Industrial hemp processing Factory within an existing 8,302-sq. ft. facility.	Approved
16	20-CUP-24	Commercial	16-Bed Social rehabilitation facility at existing 5,000 sq. ft. office building	Approved
17	20-CUP-05	Industrial	New BESS facility and related site improvements.	Approved
Unincorporated Ventura County				
18	PL15-0034	Minor Modification	A minor modification to CUP 4741 (Case No. LU06-0019) for the continued use of an existing water supply, storage, and distribution system for a period of 40 years; (2) the installation of water transmission and storage facilities on APNs 149-0-041-185 and 149-0-041-205; and (3) approval of a Conditional Certificate of Compliance to create a legal lot for APN 149-0-041-185 that complies with the Subdivision Map Act and Ventura County Subdivision Ordinance.	Approved
19	PL15-0195	Conditional Use Permit (CUP)	CUP for an existing Assembly Use located in the Rural Exclusive-20,000 sf zone designation in the Urban Residential 1-2 Dwelling Unit El Rio/Nyeland Acres Area Plan Land Use Designation located at 250 East Collins Avenue (APN 145-0-153-030). The Assembly Use includes 1,910-sf Assembly Hall/Chapel, a 1,218-sf Community Center, and a 1,502-sf parsonage (single-family dwelling unit). The site is also developed with 42 accessory parking spaces. Water is provided by the Vineyard Avenue Water Company and sewer service is provided by the County Community Service District.	Pending
20	PL16-0017	CUP	CUP for Strickland Mutual Water Company. The proposed project consists of the addition of water supply improvements (new well and booster pump), transmission and storage facilities (two 27,000-gallon storage tanks) on APN 147-0-060-055 for use in conjunction with the existing water supply, storage, and distribution system for a period of 40 years or to 2056. The proposed additional infrastructure is necessary to replace a water supply well currently idled by drought and bring the existing system into compliance with Ventura County Water Works Manual.	Approved
21	PL16-0121	Planned Development Permit (PD)	In August 2006, the project was originally approved under Case No. LU05-0073. The current proposal includes a 'phased' Planned Development Permit for a contractor's service and storage yard on an industrial M2 zoned property addressed as 2971 East Ventura Boulevard, Oxnard. CUP authorizing a caretaker dwelling for the contractor's service and storage yard. During the initial phase of the project, the applicant would install landscaping and screening to abate violations and continue to operate the contractor service and storage yard. Once adequate water service is made	Pending

Project No.[1]	Permit No.	Permit Type	Description	Status
			available by the Garden Acres Water Mutual Company, the proposal includes constructing a 3,000-sf warehouse with an internal restroom, and removal of the various storage sheds.	
22	PL17-0049	CUP	CUP for an existing 80-foot-tall communications facility and associated equipment. The original CUP 4912 expired. The stealth facility is designed as a faux pine tree. No physical improvements are proposed.	Approved
23	PL17-0077	Permit Adjustment (PAJ)	Permit Adjustment to PD permits PD1491 and PL09-0022 for occupancy of a medical office and retail sales of clothing and updating existing pole sign with new text for building located at 2945 East Ventura Boulevard in El Rio.	Approved
24	PL17-0108	Minor Modification	Modification of CUP 5275 for the continued operation of an existing model airplane field for a 20-year period. CUP 5275, approved on December 5, 2002, authorized the operation of a model airplane field until December 12, 2012. LU07-0146 extended the expiration date to March 18, 2018. The site is located on the southeast bank of the Santa Clara River at the western intersection of Vineyard Avenue and Highway 118 in Saticoy.	Pending
25	PL18-0006	General Plan Amendment	General Plan and Zoning Ordinance Amendments related to adoption of polices and development standards for the protection of habitat connectivity and wildlife corridors.	Approved
26	PL18-0011	Lot Line Adjustment (LLA)	Parcel Map Waiver (PMW)/LLA adjustment between 2 legal lots to allow the main dwelling in Parcel A be conforming to setback requirements. Parcel A (APN 107-0-190-045) is a legal lot pursuant to C of C # 15-05-975, Lot 2 (APNs 107-0-050-445, 107-0-050-465 and 107-0-050-535) is legal lot pursuant to C of C # 16-01-1033. Lot 1 (Parcel A) would increase in size from 1.21 acres to 1.44 acres, this lot is zoned OS-160 ac. Parcel B would decrease in size from 76.35 acres to 76.12 acres, this parcel is zoned AE-40 ac.	Approved
27	PL18-0029	CUP	CUP 4869 to authorize a wireless communication facility (WCF) that includes a tower (120 feet tall) and the associated telecommunication equipment located within an equipment shelter and fenced lease area. The project site has a General Plan land use designation of Agriculture and an Agricultural Exclusive (AE) zone designation, addressed as 10001 Blackburn Road.	Approved
28	PL18-0041	Minor Modification	Minor Modification to CUP No. 5020-1 to authorize a 10-year time extension of an existing WCF which includes six 6-foot panel antennas at 48 feet, three antennas mounted at 50 feet, and three antennas mounted at 57 feet on the existing 60-foot monopole. The telecommunication equipment and equipment shelter are located within a lease area at the base of the tower enclosed in 22-foot by 22-foot fenced enclosure and open equipment cabinets within another fenced enclosure accommodating two separate carriers. The enclosures include batteries and a generator.	Approved

Project No.[1]	Permit No.	Permit Type	Description	Status
29	PL18-0057	Minor Modification	Minor Modification of CUP 5013 for the continued use of an existing WCF which includes a 49-foot-tall non-stealth, monopole and associated equipment for a 10-year period. The facility includes 3 sector arrays, each with 2 panel antennas (6 antennas total) with the associated telecommunication equipment located in a fenced equipment lease area at the base of the tower. The equipment and the base of the tower are screened from public view along Highway 101 by a building, although the antennas are visible.	Approved
30	PL18-0068	CUP	CUP (Case No. PL18-0068) to authorize a minor expansion to an existing two-story drive-through mini-storage facility by adding a 32,715-sf interior third story to the shell of the existing warehouse building (Building "A"), construction of a new 4,640-sf two-story multi-use building (Building "B"), and removal of existing turf to allow for installation of drought tolerant landscaping. Water is provided by the City of Ventura and sewer service is provided by the Saticoy Sanitation District.	Approved
31	PL18-0138	Minor Modification	Minor Modification to authorize the continued use of a contractor service and storage yard at 11032 Nardo Street in Saticoy. This permit reinstates the conditions of approval of Case No. LU09-0020 with replacement of Conditions 1 and 2 for. All other conditions of approval remain the same as originally imposed in 2009. Water to the site is provided by the United Water Conservation District.	Approved
32	PL18-0139	Minor Modification	Modification to remove the expiration date of November 6, 2018 for Case No. PD1943, an RV storage facility with an office, addressed as 1028 Mission Rock Road, Santa Paula.	Approved
33	PL19-0002	CUP	CUP for an existing plant research and development facility that consists of: ▪ 1,685 sf of unenclosed covered canopy; ▪ 125,881 sf of greenhouses; ▪ 24,450 sf of warehouse/storage buildings; ▪ removal of 8,034 sf of greenhouse structures; ▪ removal of 15,291 sf of office space; ▪ construction of 7,729 sf of office/administration space; ▪ removal of 11,413 sf of miscellaneous accessory structures; ▪ construction of 10,695 sf of facilities/operations building; ▪ construction of a 144-sf entry; ▪ construction of a 1,920-sf shop building; ▪ construction of a 3,720-sf seed storage building; ▪ construction of a 1,800-sf pump house; and ▪ construction of an employee lunch area. Water to the site is provided by the City of Santa Paula and wastewater is provided by an on-site septic system.	Approved

Project No.[1]	Permit No.	Permit Type	Description	Status
34	PL19-0006	Merger	Modification of a CUP be granted to authorize the continued use of a 1,190-sf caretaker dwelling unit and 610-sf office associated with an existing, permitted self-storage facility. The storage facility is authorized under PD 1163.	Approved
35	PL19-0014	Merger	Parcel map waiver lot line merger between two legal lots referenced in APNs 145-0-012-100 and 145-0-012-110. Parcel #1 (APN 145-0-012-100) is a legal lot granted by deed measuring at 0.30 acre (13,300 sf), with a General Plan land use designation existing community (El Rio/Del Norte) and zoned RE-10,000 sf. Parcel #2 (APN 145-0-012-110) is a legal lot granted by deed (Ventura County Official Record in recorded map 21 MR 43 lots 301, 302, 303, and 304), measuring at 1.10 acres (47,824 sf) with a General Plan land use designation existing community (El Rio/Del Norte) and zoned RE-10,000 sf. These lots would merge to form one contiguous 1.4-acre lot, addressed as 269 Walnut Avenue, Oxnard.	Approved
36	PL19-0027	LLA	Parcel Map Waiver (PMW) lot line adjustment for the reconfiguration of 3 legal lots. Parcel 1 (APN 038-0-130-465) is legal in as recorded PMW LLA PL13-0165 (Recordation number 20141023-00134260) Parcel 2 (APNs 038-0-130-365 and 097-0-060-265) was found to be in compliance with the subdivision map act Certificate of Compliance CC#17-02-1154. Parcel 3 (APN 038-0-130-125) was found to be in compliance with the Subdivision Map Act CC#17-12-1240.	Pending
37	PL19-0033	PAJ	Permit Adjustment to CUP No. 4735-2 to authorize the reconfiguration of approved Phase 1B of the Todd Road Jail facility. The proposal involves the relocation of approximately one-half of the approved 149,762-sf inmate housing building from the eastern side of the existing jail facility to the western side of the facility.	Pending
38	PL19-0034	PAJ	Permit Adjustment to CUP No. PL14-0084 to reduce the CUP boundary of an Agricultural Contractor's Service and Storage Yard from 2.5 acres to 1.5 acres. The General Plan land use designation for the subject property is Agricultural and the zoning is AE.	Approved
39	PL19-0036	PAJ	Permit Adjustment to CUP No. LU2932 for modifications to Wishtoyo Clubhouse, commonly known as the Mountain View Golf Course, addressed as 16799 South Mountain View Road. Facility improvements would include enclosing an existing 520-sf patio area located at the north east portion of the clubhouse, the removal of an existing interior bar area adjacent to the kitchen, the removal of a bar counter outside of the existing office, and the remodel of the existing bathrooms to conform to ADA regulations. Water for the clubhouse is provided by the City of Santa Paula. The applicant is proposing to update/repair the septic system that services the clubhouse as part of the proposed commercial kitchen improvements. The property has a General Plan land use designation of Open Space and is zoned Open Space 80 acres.	Pending

Project No.[1]	Permit No.	Permit Type	Description	Status
40	PL19-0039	PAJ	Request for modification of existing CUP No. 4858 (and Minor Modification No. PL14-0040) to decommission and abandon Water Well site no. 5 and well and filtration system (the reservoir to remain) located on a different site and to install Well no. 7 and pump house. Crestview Mutual Water Company office site is located at 328 Valley Vista Drive in Camarillo, APN 152-0-341-065.	Approved
41	PL19-0060	LLA	Land Conservation Act (LCA) Contract application and Lot Line Adjustment between APNs 109-0-042-080 and 109-0-042-090.	Approved
42	PL19-0062	Minor Modification	Minor Modification to CUP No. 4535 for the ongoing operation of an 80-foot-tall wireless communication tower owned by American Tower known as Site No. 301077.	Approved
43	PL19-0111	CUP	Request to conditionally develop a proposed 55,820-sf mini-storage warehouse unit found on an existing 1.82-acre site at 1456 Rosal Lane in Saticoy. Parcel is located in Light Industrial (IND) zone as part of the Old Town Saticoy section of the Saticoy Area Plan. The site currently contains row crops and a residence that was identified as a potential historic resource.	Pending
44	PL-19-0131	Minor Modification	Minor Modification to CUP 4855 (LU10-0022) for continued operation of an automotive storage yard.	Pending
45	PL-19-0132	Minor Modification	Minor Modification to CUP 4902 (LU10-0025) to authorize the continued operation of an automotive storage and salvage yard for an additional 30-year period.	Pending
46	PL-19-0133	Minor Modification	Minor Modification to CUP 4356 (LU10-0019) to authorize the continued operation of an automotive storage, dismantling, and salvage yard for an additional 30-year period.	Pending
47	PL20-0021	LLA	LLA between APNs 064-0-130-065 and 064-0-130-075.	Pending
48	PL20-0048	CUP	Replacement CUP for CUP No. 4545 which is a wireless communication facility consisting of two non-stealth lattice towers currently owned by American Tower Services, LLC known as ATC Site Numbers 8573 and 8126.	Pending
49	PL20-0058	Minor Modification	Minor Modification for the continued use for an automotive dismantler yard.	Pending
50	PL20-0080	Land Conservation Act (LCA)	New 10-year LCA Contract application for the 368.26-acre property located at the southwest corner of Rice Road and Central Avenue, Oxnard on APNs 144-0-110-305 and -575.	Pending
51	PL20-0089	Minor Modification	Minor Modification (CUP No. LU10-0094) to CUP No. 4400-1 to allow continued use of a “Kennel/Catteries” (Ventura County NCZO 8105-5).	Pending
52	PL20-0092	Modification	Minor Modification to CUP 5135 (LU10-0125) for continued operation of a WCF for an additional 10-year term.	Pending
53	PL20-0097	Parcel Map	Tentative Parcel Map to create two legal lots on APNs 128-0-021-195 and 128-0-021-215.	Pending

Project No.[1]	Permit No.	Permit Type	Description	Status
54	PL20-0111	Minor Modification	Minor Modification to allow the extension of Entitlement for additional time for CUP 4600 (LU10-0073).	Pending
City of Ventura				
55	PROJ-8150	Residential	17 single-family homes, one duplex.	Pending
56	PROJ-6811	Mixed Use	306 apartment units, 5,000-sf commercial, 5,000-sf clubhouse.	Approved
57	PROJ-6270	Residential	117 single-family homes, 31 affordable for sale triple/quadplex units, 50 apartment units.	Approved
58	PROJ-8446	Residential	131 single-family homes, 34 townhome units, 2 parks, 3 miniparks.	Approved
59	PROJ-4154	Residential	50 apartment units (low income).	Approved
60	PROJ-7166	Mixed Use	Mixed use: 43 apartment units, two live/work units, 2,100-sf commercial/retail.	Approved
61	PROJ-03829	Residential	216 single family homes; 110 townhome units.	Approved
62	PROJ-8427	Residential	78 apartment units.	Approved
63	PROJ-13226	Commercial	1,162-sf car wash and existing food mart building remodel.	Pending
64	PROJ-8428	Mixed Use	Mixed use: 43 apartment units, 1,200-sf retail.	Approved
65	PROJ-4222	Residential	173 apartment units.	Approved

[1] See Figure 3-1 for the locations of the cumulative projects in relation to the project site.

Sources: Appendix A; Ventura County 2020.

Figure 3-1 Cumulative Projects Map

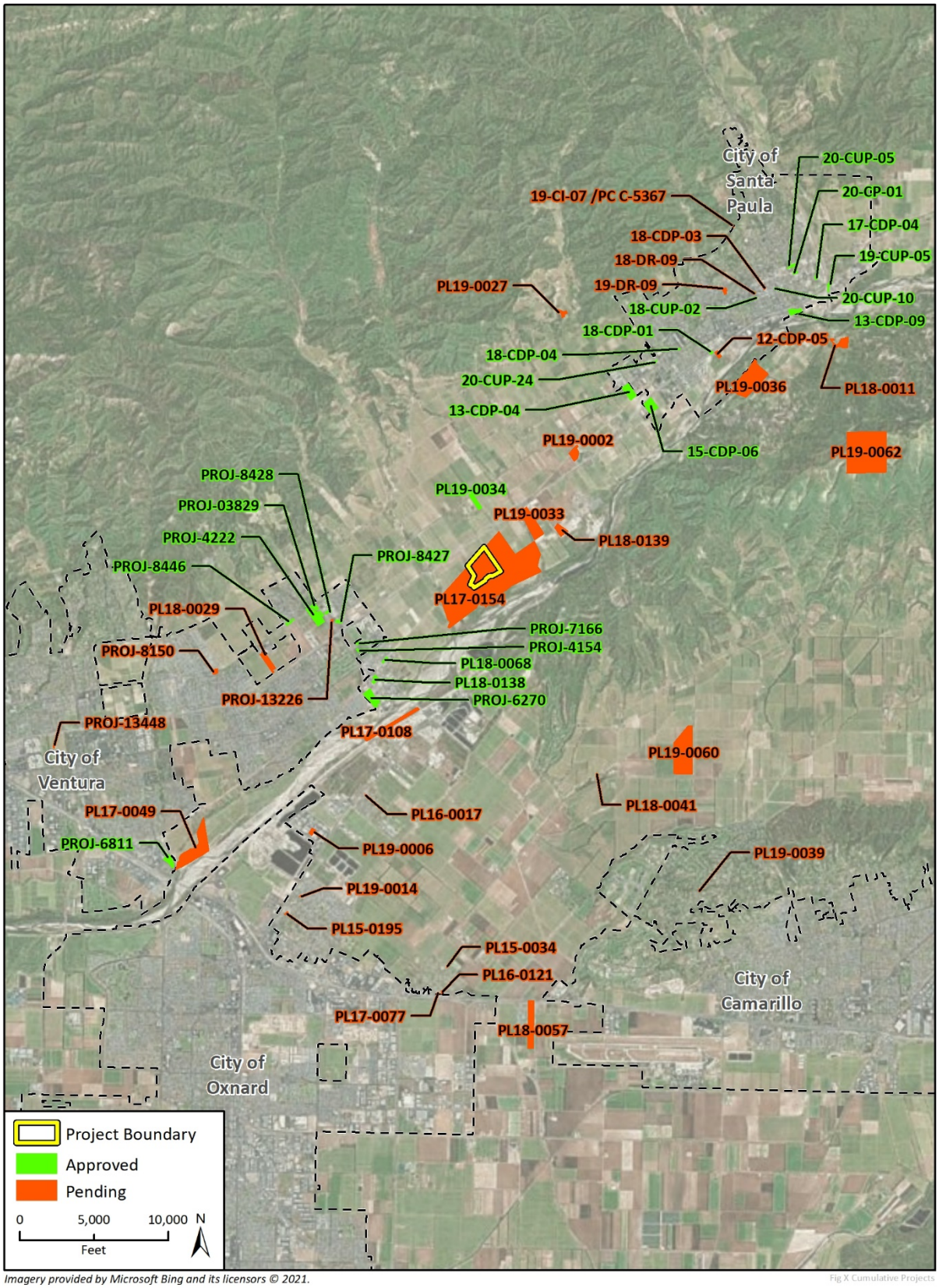


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Fig X Cumulative Projects

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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the Agromin-Limoneira Commercial Organics Processing Operation Project for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A "significant effect" as defined by *CEQA Guidelines* Section 15382:

> means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the County and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed Project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text, followed by a discussion of the effect and its significance. Each impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable**. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of *CEQA Guidelines*.
- **Less than Significant with Mitigation Incorporated**. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of *CEQA Guidelines*.
- **Less than Significant**. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed Project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed Project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*.

The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the proposed Project.

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4.1 Agricultural Resources – Soils

This section analyzes the proposed Project's potential impacts to soils designated as Prime, Statewide Importance and/or Unique (hereafter referred to as "Important Farmland") as defined by CEQA Guidelines Appendix G.

4.1.1 Setting

4.1.1.1 Agricultural Context

Regional

Ventura County's temperate climate with warm, wet winters and hot, dry summers coupled with fertile soils, supports the cultivation of a diversity of agricultural commodities, including strawberries, celery, lemons, raspberries, avocados, nursery stock, tomatoes, peppers, cut flowers, cabbage, and kale. According to the State of California, Ventura County ranked eighth among California counties in total crop value in 2017 based on data from the County Agricultural Commissioner's Annual Crop and Livestock Report (Ventura County 2019). The estimated gross value of Ventura County's agriculture in 2018 was approximately $2.1 billion.

Areas that sustain agricultural commodity growth have a broad range of characteristics. For example, berry production requires a temperate moist climate, so most strawberry production is found close to the coast in the unincorporated County, surrounding the cities of Ventura, Oxnard, Camarillo, and Port Hueneme. The climate tends to be dryer and warmer further from the coast, favoring citrus crops. Specifically, the SR 126 and SR 150 corridors are prime areas for citrus growth. Fertile soil combined with ideal temperate seasonal temperatures allow lemons, oranges, and mandarins to thrive. Some commodity types, such as avocados, can grow in a variety of climate regions, allowing them to flourish countywide (Ventura County 2019).

Project Site

The Project site is currently occupied by an agricultural material composting operation permitted by the Ventura County Environmental Health Division (acting as the Local Enforcement Agency) with an annual loading of 60,000 tons per year (or an average loading of 164 tons per day). The operation is accessory to agricultural activities (orchards) performed on the site. Currently, 15 acres of the 70-acre Project site are used for an agricultural composting facility. The remainder of the subject parcel currently includes lemon orchards as well as miscellaneous structures on-site including three propane-powered windmills and agricultural accessory and support structures and improvements (see Section 2, *Project Description,* for additional information pertaining to current site activities).

4.1.1.2 Agricultural Soils, Important Farmlands, and Land Conservation Act Characteristics of the Project Site

The United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) assesses the agricultural capacity of soils through its utilization of the Land Capability Classification System and the Storie Index. Capability Classes provide insight into the suitability of a soil for field crop uses based on factors that include texture, erosion, wetness, permeability, and fertility. The Storie Index is a soil rating based on soil properties that govern a soil's potential for cultivated

agriculture in California. The Storie Index assesses the productivity of a soil based on the following four characteristics:

- Factor A – degree of soil profile development
- Factor B – texture of the surface layer
- Factor C – slope
- Factor X – manageable features, including drainage, micro relief, fertility, acidity, erosion, and salt content

Under the California Revised Storie Index, these four factors translate into one of four soil grades: Grade 1 (excellent), Grade 2 (good), Grade 3 (fair), and Grade 4 (poor). In addition, the NRCS farmland classification identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops and identifies map units as "Prime Farmland, if irrigated," "Farmland of Statewide Importance," and "Not Prime Farmland." The Project site includes California Revised Storie Index Grade 1 (excellent) soils, including Mocho Loam (MoA), 0-2 percent slopes; Mocho Clay Loam (MsA), 0-2 percent slopes; and Mocho Clay Loam (MsB), 2-5 percent slopes.

In addition to the NRCS system, the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) compiles Important Farmland maps for each county in the state. Maps and statistics are produced biannually using a process that integrates aerial photo interpretation, field mapping, a computerized mapping system, and public review. The FMMP Important Farmland differs from the NRCS farmland classification because the NRCS farmland classifications are based solely on soil quality, while the FMMP Important Farmland designations are based on both soil quality and current land use.

The Project site is mapped as including approximately 55 acres of Prime Farmland (DOC 2016), corresponding to the portion of the site not already occupied by the existing agricultural material composting operation. Prime Farmland is defined by the FMMP as Important Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. The land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date. In addition, Land Conservation Act (LCA) lands, otherwise known as Williamson Act lands, intended to preserve agricultural land and discourage its premature conversion to non-agricultural uses, are located across the entire Project site. Figure 4.1-1 shows the location of Prime Farmland and Williamson Act lands on the Project site.

Figure 4.1-1 Important Farmland on the Project Site

Imagery provided by Microsoft Bing and its licensors © 2020.
Farmland data provided by the Department or Conservation, 2016.

4.1.2 Regulatory Setting

4.1.2.1 California Department of Conservation Farmland Mapping and Monitoring Program

As previously discussed, the California DOC FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is categorized according to soil quality and irrigation status. The maps are updated every 2 years through the review of aerial photographs, a computer mapping system, public review, and field reconnaissance.

4.1.2.2 California Code of Regulations (Title 3 Food and Agriculture)

California Code of Regulations (CCR) Title 3, Sections 6000–6920 regulate the registration, management, use, and application of pesticides on agricultural lands. These regulations are enforced by the Ventura County Agricultural Commissioner's Office. Generally, specific regulations vary for each pesticide, its method of application, and use. However, Sections 6600 and 6614 contain some general regulations relating to the application of pesticide, as well as general standards of care and protection of persons, animals, and property.

4.1.2.3 California Land Conservation Act (Williamson Act) Contract

Preservation of agricultural, recreational, and open space lands through agricultural preserve contracts between the County and property owners is a technique encouraged by the State of California for implementing the general plan. Agricultural preserve contracts are executed through procedures enabled by the California LCA of 1965, also known as the Williamson Act. A contract may be entered for property with agricultural, recreational, and open space uses in return for decreased property taxes. LCA contracts preserve agriculture and open space over a rolling term 10-year contract. The inclusion of a parcel in an LCA (Williamson Act) contract is entirely voluntary and must have the consent of the property owner. All land with an Agricultural land use designation in the County General Plan is considered an Agricultural Preserve and is eligible for an LCA contract. The Project site is designated as prime enrolled agricultural land under the LCA and therefore is subject to an LCA (Williamson Act) contract as shown above in Figure 4.1-1.

Local Regulations

Ventura County General Plan

The following goals, policies, and implementation programs from the 2040 General Plan Agriculture Element are applicable to the proposed project.

- **Goal AG-1.** To preserve and protect agricultural lands as a nonrenewable resource to assure the continued availability of such lands to produce food, fiber, and ornamentals.
  - **Policy AG-1.1: Agricultural Land Protection and Preservation**. The County shall continue to protect and preserve agricultural land by directing growth away from productive agricultural lands into cities, unincorporated urban areas, or existing communities and by supporting the acquisition or voluntary dedication of agriculture conservation easements.

  - **Policy AG-1.2: Agricultural Land Use Designation.** The County shall ensure that discretionary development located on land designated as Agricultural on the General Plan Land Use Diagram and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory is planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil.
  - **Policy AG-1.4: Land Conservation Act Contracts.** The County shall encourage Land Conservation Act (LCA) contracts on irrigated farmlands and Open Space lands.
- **Goal AG-2.** To minimize conflicts between agricultural operations and urban land uses.
  - **Policy AG-2.1: Discretionary Development Adjacent to Agriculturally Designated Lands**. The County shall ensure that discretionary development adjacent to Agriculturally designated lands does not conflict with agricultural use of those lands.
- **Implementation Program O: Establish an Agricultural Conservation Easement:** Applicants for discretionary projects that would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table below [see Table 4.1-1] shall ensure the permanent protection of off-site farmland of equal quality at a 1:1 ratio (acres preserved: acres converted) through the establishment of an off-site agricultural conservation easement.

Table 4.1-1 Significance Thresholds Based on Impacted Farmland

General Plan Land Use Designation	Important Farmland Inventory Classification	Acres Lost
Agricultural	Prime/Statewide	5
	Unique	10
	Local	15
Open Space/Retail	Prime/Statewide	10
	Unique	15
	Local	20
All Land Use Designations	Prime/Statewide	20
	Unique	30
	Local	40

Source: County of Ventura 2020

If the County Planning Division, in consultation with the Agricultural Commissioner (hereafter referred to as the "reviewing agencies"), determines that a discretionary project would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in Table 4.1-1, the project applicant must prepare and submit a report for the review and approval of the reviewing agencies that identifies a minimum of one proposed potential mitigation site suitable for ensuring the permanent protection of off-site farmland of equal quality at a 1:1 ratio (acres preserved: acres converted) through the establishment of an off-site agricultural conservation easement. The contents of the report will be determined, reviewed, and approved by the reviewing agencies and will include information necessary for the reviewing agencies and a qualified entity responsible for holding the conservation easement to determine the viability of the proposed mitigation site for the establishment of a permanent agricultural conservation easement. Among the factors necessary for approval by the reviewing agencies, the proposed mitigation site must be located in the County of Ventura unincorporated area, must not already have permanent protection, and must be equivalent to or greater than the type of Important Farmland (e.g., Unique

Farmland) that would be converted by the Project. Among other terms that may be required by the reviewing agencies in consultation with a qualified entity, the terms of an agricultural conservation easement must include a requirement that it run with the land. The Project applicant is responsible for all costs incurred by the County and the qualified entity to successfully implement this mitigation measure. Proof of the successful establishment of an agricultural conservation easement must be provided to the Planning Division prior to issuance of a zoning clearance.

SOAR ORDINANCE

The County's Save Open Space and Agricultural Resources (SOAR) Ordinance was initially adopted by the County Board of Supervisors in 1998. In November of 2016 Measure C was adopted by the voters of Ventura County, extending SOAR through December 31, 2050. The SOAR Ordinance requires a majority vote of the people in order to rezone land currently designated as Open Space, Agricultural, or Rural in the County General Plan. The Project site is designated Agricultural in the County General Plan; however, with the proposed text amendment to permit the proposed commercial organics processing use on the subject property, the Project would not involve or require a change in zoning or land use designation and is therefore not subject to the County's SOAR ordinance. The text amendment would allow such type of development within the Agricultural land use designation, because commercial facilities of this type are considered accessory to agriculture since the finished product generated by the Project (compost) is used for agriculture and because the Project provides a location for green material to be processed/composted without travelling far away from the point of generation.

AGRICULTURAL/URBAN BUFFER POLICY

The County's Agricultural/Urban Buffer Policy provides policy direction to prevent and/or mitigate conflicts that may arise at the agricultural/urban interface. This policy is intended to protect the economic viability and long-term sustainability of the County's agricultural industry. It applies where urban structures or ongoing non-farming activities are permitted adjacent to land in crop or orchard production or classified by the DOC FMMP as Prime, Statewide Importance, Unique, or Local Importance farmland. These guidelines apply to projects requiring discretionary approval by the County or a City where the proposed non-farming activity is abutting or on land zoned "Agriculture Exclusive," "Open Space," or "Rural Agriculture," and the farming activity is located outside a Sphere of Influence. The Policy states that urban developments or non-agricultural uses shall be conditioned to provide and maintain a 300-foot setback and chain-link fence on the non-agricultural property between the urban use and the agriculture, or a 150-foot buffer/setback if a vegetative screen is used.

GUIDELINES FOR ORDERLY DEVELOPMENT

Ventura County's Guidelines for Orderly Development (Guidelines) were originally adopted by the Board of Supervisors, all city councils within Ventura County, and the Ventura Local Agency Formation Commission (LAFCo) in 1969. The County revised and readopted the Guidelines in December 1996. The intent of the Guidelines is threefold: (1) clarify the relationship between the cities and the County with respect to urban planning, (2) facilitate a better understanding regarding development standards and fees, and (3) identify the appropriate governmental agency responsible for making determinations on land use change requests. The Guidelines represent a collaborative commitment to encourage urban development within cities if practical, enhance the regional responsibility of the County, and facilitate orderly planning and development in Ventura County. General Plan goals, policies, and implementation programs that integrate the Guidelines are

primarily contained in the Land Use and Community Character Element. Because the proposed Project is located within the City of Santa Paula Area of Interest, but outside the City's Sphere of Influence, it is subject to the following policies within the Guidelines:

9. Applications for discretionary land use permits or entitlements shall be referred to the City for review and comment. The County shall respond to all comments received from the City.
10. The County is primarily responsible for local land use planning, consistent with the general land use goals and objectives of the City.
11. Urban development should be allowed only within Existing Communities as designated on the County General Plan.
12. Existing Communities as designated on the County General Plan should financially support County-administered urban services which are comparable to those urban services provided by Cities.

GREENBELT AGREEMENTS

The cities of Ventura, Santa Paula, Oxnard, Fillmore, and Camarillo, the LAFCo, and the County have adopted greenbelt agreements between jurisdictions to further the objectives of the County's Guidelines for Orderly Development by preserving agriculture and open space between urban areas. A greenbelt agreement involves establishing a mutual agreement between these cities and/or the County of Ventura regarding the limit of urban growth. LAFCo will not approve an annexation proposal or an Out-of-Service Agency Agreement that conflicts with any greenbelt agreement and encourages amendments to greenbelt agreements prior to requesting an annexation. The agreements establish a policy of retention of open space within unincorporated areas of Ventura County. The proposed Project is located on land that is subject to the County of Ventura-City of Santa Paula Greenbelt Agreement.

4.1.3 Impact Analysis

4.1.3.1 Significance Thresholds

Per the County of Ventura Initial Study Assessment Guidelines (ISAG, Ventura County 2011), impacts related to agricultural soils would be potentially significant if the proposed Project would:

1. Result in the direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique, or Local Importance, beyond the threshold amounts set forth in Table 4.1-1 (from Section 5a.C of the County of Ventura ISAG);
2. Involve a General Plan amendment that will result in the loss of agricultural soils; and/or
3. Be inconsistent with the applicable General Plan Goals and Policies for "Agricultural Resources – Soils" identified in the County of Ventura ISAG.

4.1.3.2 Project Impacts and Mitigation Measures

Threshold 1:	Would the Project result in the direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique, or Local Importance, beyond the threshold amounts set forth in Table 4.1-1?

Impact AG-1 THE PROJECT WOULD RESULT IN THE DIRECT LOSS OF APPROXIMATELY 34.26 ACRES OF PRIME FARMLAND TO AN AGRICULTURAL ACCESSORY USE. ALTHOUGH IMPLEMENTATION OF MITIGATION WOULD REDUCE THIS IMPACT, THE IMPACT WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.

As previously described, 15 acres of the Project site is occupied by an agricultural material composting operation, and the remainder of the site is occupied with orchards and miscellaneous structures, including three propane-powered windmills and agricultural accessory and support structures and improvements. The proposed Project would result in the direct loss of approximately 34.26 acres of Prime Farmland that would be converted from agricultural production to an agricultural accessory use due to the construction of paved areas and proposed buildings[1]. The proposed use of approximately 21 acres of the Project site for landscaping, retention basins, and native soil areas (including areas covered by composting piles) would remove these areas from agricultural production but would not necessarily result in permanent conversion of agricultural land, and therefore only 34.26 acres of direct loss of Prime Farmland would occur. The conversion of 34.26 acres exceeds the 5-acre significance threshold for impacts to Prime Farmland (see Table 4.1-1). Since the proposed Project would result in a loss of Important Farmland that exceeds the County's significance thresholds, the permanent and direct loss of Important Farmland soils would result in a significant impact.

Mitigation Measures

AG-1 Establish an Agricultural Conservation Easement in Compliance with the Ventura County General Plan Agriculture Element Implementation Program O and Policies AG-1.1 and AG-1.8

Purpose: To establish an agricultural conservation easement that ensures the protection of off-site farmland at a 1:1 ratio (acres preserved: acres converted) to compensate for the direct and indirect loss of Prime/Statewide Important Farmland ("Classified Farmland") from buildings, paved areas, and on-site wastewater treatment system developed for the project. Based on the current project description, the project is expected to result in the loss of 34.26 acres of Prime/Statewide Important Farmland.

Requirement: The Permittee shall identify a total of 34.26 acres of equivalent Classified Farmland, outside the project's CUP boundaries, to be preserved through the establishment of an off-site agricultural conservation easement. Total acreage of the agricultural mitigation site(s) to be encumbered by the conservation easement may be adjusted by the Planning Division if the project is modified, resulting in an increase or decrease in the loss of Classified Soils, prior to the issuance of zoning clearance for construction of Phase I, Phase 2, or approved CUP modifications. The proposed mitigation site(s) shall be located in the County of Ventura unincorporated area, must not be encumbered by an existing conservation easement, and must be of sufficient size to be viable for

[1] The 34.26 total area of Prime Farmland conversion is based on the following assumptions: total paving area of 27.37 acres; total building footprint of 5.3 acres; and 1.59 acres for the septic system; for a total of 34.26 acres permanently removed from agricultural production.

long-term farming use as determined by the Planning Director in consultation with the Agricultural Commissioner.

Documentation: The Project applicant shall prepare a report, in consultation with the Agricultural Commissioner, that identifies a minimum of one agricultural mitigation site suitable for protection pursuant to the required agricultural conservation easement. The contents of the report shall include a description of mitigation site(s), including a site plan of the location and rationale for site selection, information to determine the viability of the proposed mitigation site(s) for the establishment of an agricultural conservation easement, and maintenance and monitoring necessary to ensure that each agricultural mitigation site is not developed, rezoned, or subdivided. The agricultural conservation easement shall be recorded with the Ventura County Recorder and appear in the chain of title of the encumbered real property with a copy of the recorded document provided to the Planning Division.

The agricultural conservation easement(s), which shall be conveyed to and held by a County-approved entity qualified to hold the instrument (such as a public entity or land trust) shall remain in effect at least until the CUP expires and all developed area(s) have been converted to an agricultural use as determined and approved in writing by the Planning Division in consultation with the Agricultural Commissioner. If the Permittee seeks modifications to the approved CUP such as the square footage for buildings and paved areas associated with the approved project, the Permittee shall submit an application to modify the CUP and agricultural conservation easement(s).

The Permittee shall also deposit funds with the County to contract with a qualified third party agricultural economic consultant ("Qualified Consultant") to review and advise the Planning Director and Agricultural Commissioner regarding the establishment and implementation of the agricultural conservation easement(s).

Prior to the County engaging with a Qualified Consultant, the County shall confer in writing with the Permittee regarding the necessary work to be contracted, as well as the estimated costs of such work. Whenever feasible, the County will use the lowest responsible bidder or proposer. Any decisions made by County staff in reliance on the Qualified Consultant work may be appealed pursuant to the appeal procedures contained in the Ventura County Zoning Ordinance Code then in effect.

The Project applicant shall bear the full costs of all County staff time, materials, and County-retained consultants.

Timing: Prior to zoning clearance for use inauguration, the Permittee shall submit to the Planning Director for review and approval, the following:

(1) The required fee for services to be completed by the Qualified Consultant.

(2) The agricultural report and agricultural conservation easement(s), in accordance with the applicable requirements of this condition (above).

(3) A final executed conservation easement(s), approved as to form by the County Counsel, recorded with the Ventura County Recorder, and Preliminary Title Report that verifies the conservation easement(s) on the encumbered real property.

Monitoring and Reporting: The Permittee shall submit monitoring reports and be subject to site inspections occurring no less than once every 3 years, unless the terms of the permit require more frequent inspections of the conservation easement. The Planning Division maintains a copy of the agricultural conservation easement report and recorded agricultural conservation easement(s) in

the Project File. Planning Division staff has the authority to conduct periodic site inspections at any time to ensure ongoing compliance with this condition. If the Planning Division confirms that the agricultural conservation easement(s) has not been maintained as required, enforcement actions may be enacted in accordance with § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

Significance After Mitigation

Implementation of Mitigation Measures AG-1 would reduce impacts to Important Farmland to the extent feasible; however, any direct or indirect loss of Important Farmlands would be considered a permanent loss of a valuable resource. Establishing agricultural conservation easements would conserve Important Farmland within the County but would not prevent the loss of existing Important Farmland caused by conversion of 34 acres of the Project site from agricultural production to an agricultural accessory use. There are no actions or policies that the County could feasibly mandate to fully replace this loss of Important Farmland. Therefore, this impact would remain significant and unavoidable.

Threshold 2:	Would the Project involve a General Plan amendment that would result in the loss of agricultural soils?

Impact AG-2 THE PROJECT WOULD NOT REQUIRE A GENERAL PLAN AMENDMENT. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Project site has a General Plan land use designation of Agricultural and a zoning designation of AE-40 ac (Agricultural Exclusive, 40-acre minimum lot size). An amendment to the General Plan is not required although, as noted above, the proposed Project would result in the loss of agricultural soils. Therefore, with approval of the text amendment, the Project would comply with applicable requirements of the Ventura County NCZO and the County General Plan and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3:	Would the Project be inconsistent with the applicable General Plan Goals and Policies for "Agricultural Resources – Soils" in the County's Initial Study Assessment Guidelines?

Impact AG-3 THE PROJECT WOULD BE INCONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN POLICIES TO PRESERVE AND PROTECT AGRICULTURAL LANDS (AG-1.1 AND AG-1.2) AND POLICIES TO REDUCE CONFLICTS OF DEVELOPMENT ADJACENT TO AGRICULTURALLY DESIGNATED LANDS (AG-2.1). IN ADDITION, THE PROJECT WOULD BE INCONSISTENT WITH THE VENTURA COUNTY AGRICULTURAL/URBAN BUFFER POLICY. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Due to the proposed conversion of approximately 34 acres of Prime Farmland, the Project has the potential to conflict with the following 2040 General Plan policies:[2]

- **Policy AG-1.1: Agricultural Land Protection and Preservation**. The County shall continue to protect and preserve agricultural land by directing growth away from productive agricultural lands into cities, unincorporated urban areas, or existing communities and by supporting the acquisition or voluntary dedication of agriculture conservation easements.
- **Policy AG-1.2: Agricultural Land Use Designation.** The County shall ensure that discretionary development located on land designated as Agricultural on the General Plan Land Use Diagram and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory is planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil.
- **Policy AG-1.4: Land Conservation Act Contracts.** The County shall encourage Land Conservation Act (LCA) contracts on irrigated farmlands and Open Space lands.
- **Policy AG-2.1: Discretionary Development Adjacent to Agriculturally Designated Lands**. The County shall ensure that discretionary development adjacent to Agriculturally designated lands does not conflict with agricultural use of those lands.

Policies AG-1.1 and AG-1.2 serve to protect and preserve agricultural land. Since the proposed Project would result in a loss of Important Farmland that exceeds the County's significance thresholds, the permanent and direct loss of Important Farmland soils would result in a significant impact.

The proposed text amendment to NCZO Section 8107-36.4.1(a)(2)(a) would require that the Project "demonstrates that all terms and conditions of an applicable Land Conservation Act (LCA) contract will be maintained if a commercial organics processing operation is located on land subject to an LCA contract (LCA Contract Number 8-1.12). The applicant must also demonstrate compliance with the California Land Conservation Act of 1965, Sections 51200 et seq. of the California Government Code and the Williamson Act." As a result, the proposed Project would be required to comply with the existing LCA on the property in accordance with General Plan Policies AG-1.1, AG-1.2, and AG-1.4.

The proposed Project was also evaluated for conformance with the Ventura County Agricultural/Urban Buffer Policy, which requires a 300-foot setback (or 150-foot setback with sufficient vegetative screening) between non-agricultural uses and agriculture land uses. Non-agricultural land uses (compost piles and proposed facility buildings) would be approximately 48

[2] The Initial Study for the Project identified that the Project would conflict with General Plan Goal 1.6.1-1 and Policy 1.6.2-1. Since the publication of the Initial Study, the County of Ventura has updated their General Plan. As stated in the EIR for the 2040 General Plan, Policy 1.6.2-1 has been updated to Policy AG-1.2, Agricultural Land Use Designation.

feet from adjoining agricultural uses. On October 7, 2019, the proposed Project was presented to the Agricultural Policy Advisory Committee (APAC) and the County's Agricultural Commissioner. The Project Applicant requested a reduced buffer from the 300-foot setback requirement. The request for a reduced buffer would conflict with the Agricultural/Urban Buffer Policy, as well as General Plan Policy AG-2.1, Discretionary Development Adjacent to Agriculturally Designated Lands, resulting in a significant impact.

In addition, because the Project site is located within a designated County of Ventura-City of Santa Paula Greenbelt, the Project would be subject to the interagency Greenbelt Agreement. However, since the proposed Project is considered an agricultural accessory use and would not involve a change in land use designation and (with the approval of the Project's text amendment to permit the proposed commercial organics processing use on the subject property) it would be consistent with applicable zoning, the Project would be consistent with the County of Ventura-City of Santa Paula Greenbelt Agreement.

The Project is also subject to the Guidelines for Orderly Development (Guidelines), which contain policies that are specific to land within a city's Sphere of Influence, or Area of Interest but outside the Sphere of Influence (in this case, the Project site is within the City of Santa Paula Area of Interest). Guidelines applicable to the Project include:

- Applications for discretionary land use permits or entitlements shall be referred to the City for review and comment. The County shall respond to all comments received from the City
- The County is primarily responsible for local land use planning, consistent with the general land use goals and objectives of the City
- Urban development should be allowed only within Existing Communities as designated on the County General Plan

As stated under Section 2, *Project Description*, because the Project would include discretionary approval of a conditional use permit and NCZO text amendment, the County is primarily responsible for local land use planning. Furthermore, according to the Guidelines, the definition of "urban development" includes development that "would result in the establishment of commercial or industrial uses which are neither agriculturally-related nor related to the production of mineral resources." Although the Project site is not located within an Existing Community, it has a land use designation of Agricultural and, as stated in the proposed text amendment, the Project would be subject to the requirement that "[a]t least 60 percent of the finished products generated by the commercial organics processing operation are used for an agricultural use or an agricultural accessory use in Ventura County, the City of Carpinteria, or outside the State of California." Additionally, as previously discussed in this analysis, the proposed Project is considered an agricultural accessory use. As a result, the Project would not meet the definition of urban development. Therefore, the project is consistent with the Guidelines.

Mitigation Measures

AG-2 Compliance with the Ventura County Agricultural Commissioner's Office recommendations:

Purpose: To ensure consistency with Ventura County General Plan policies (AG-1.1, AG-1.2, AG-2.1, and Agricultural/Urban Buffer Policy).

Requirement: Prior to design approval and issuance of grading and building permits, the County shall require the Project to include the following:

1. The Permittee shall prepare a final landscape plan, which shall be subject to authorization by the Agricultural Policy Advisory Committee, and install a modified vegetative screen which meets the intent of the agriculture buffer policy and implements the following minimum requirements:
    - Two staggered rows of trees and shrubs characterized by evergreen foliage that extends from the base of the plant to the crown
    - Trees and shrubs shall be vigorous, drought tolerant, and at least 6 feet in height at the time of installation (a minimum 24-inch box size for selected tree specimens)
    - Plants shall have 50 to 75 percent porosity (i.e., approximately 50 to 75 percent of the plant is air space)
    - Plant height shall vary in order to capture drift within 4 feet of ground applications
    - Tree species shall have a mature height of 15 feet or more
    - To ensure adequate coverage, two staggered rows should be located 5 feet apart and consist of minimum 5-gallon plants at least 6 feet tall planted 10 feet on center
    - Recommended plants include toyon (*Heteromeles arbutifolia*), sugarbush (*Rhus ovata*), laurel sumac (*Malosma laurina*), and Italian cypress (*Cupressus sempervirens*)
    - A long-term plan shall be in place for maintaining the vegetative shelter belt
2. Installation of a reinforced 8-foot high chain link fence with top bar providing connections and additional stability between fenceposts
3. Coordination between Limoneira Company and the Permittee (Agromin) regarding the schedule of approved agricultural pesticide application and notification thereof
4. Posting of Right-to-Farm Ordinance at the project site

Documentation: The Permittee shall submit the draft landscape plan to the Agricultural Commissioner's Office for review and approval by the Agricultural Policy Advisory Committee. The Permittee shall submit the final design plans demonstrating compliance with the other provisions of the mitigation measure to the Planning Division for review and approval. A California-registered landscape architect (or other qualified individual as approved by the Planning Director) shall prepare the landscape plan, demonstrating compliance with the requirements set forth in this mitigation measure, § 8109-0.6 (Landscaping) of the Non-Coastal Zoning Ordinance, and the Ventura County Landscape Design Criteria. The landscape architect responsible for the work shall stamp the plan. After landscape installation, the Permittee shall submit to Planning Division staff a statement from the Project landscape architect that the Permittee installed all landscaping as shown on the approved landscape plan. Prior to installation of the landscaping, the Permittee must obtain the Planning Director's approval of any changes to the landscape plans that affect the character or quantity of the plant material or irrigation system design.

Timing: The Permittee shall prepare and submit a final landscape plan and final design plans for review and approval by the Planning Division and the Agricultural Policy Advisory Committee prior to issuance of a Zoning Clearance for construction. Landscaping installation and maintenance activities shall occur according to the timing requirements set forth in the "Ventura County Landscape Design Criteria" (§ F).

Monitoring and Reporting: Landscaping approval/installation verification, monitoring activities, and enforcement activities shall occur according to the procedures set forth in the "Ventura County Landscape Design Criteria" (§§ F and G) and § 8114-3 of the Non-Coastal Zoning Ordinance. The Planning Division maintains the landscape plans and final design plans in the Project file and has the authority to conduct site inspections to ensure that the Permittee installs and maintains the landscaping in accordance with the approved plan consistent with the requirements of § 8114-3 of the Non-Coastal Zoning Ordinance.

Significance After Mitigation

Implementation of Mitigation Measure AG-1 would reduce impacts to Important Farmland to the extent feasible by establishing an agricultural conservation easement which would conserve Important Farmland within the County. As a result, the Project would "protect and preserve agricultural land… by supporting the acquisition or voluntary dedication of agriculture conservation easements" (Goal AG-1.1). Furthermore, with the implementation of Mitigation Measure AG-1, the Project would be "planned and designed to remove as little land as possible from potential agricultural production" (Goal AG-1.2).

In addition, with incorporation of Mitigation Measure AG-2, the proposed Project would be designed to minimize potential to "conflict with agricultural use of those lands" (Policy AG-2.1) with the use of proposed vegetative screening, fence installation, coordination with adjacent agricultural operations during approved agricultural pesticide application, posting a Right-to-Farm Ordinance notice. Furthermore, implementation of Mitigation Measure AG-2 would include requirements consistent with the Ventura County Agricultural/Urban Buffer Policy.

Therefore, Impact AG-2 would be less than significant after mitigation.

4.1.4 Cumulative Impacts

Table 3-1 in Section 3, *Environmental Settings*, identifies planned and pending projects in the vicinity of the Project site. Some of these projects may result in the direct loss of soils designated Prime Farmland. As stated in the County of Ventura's ISAG, any project that would result in the direct and/or indirect loss of agricultural soils would contribute to a significant cumulative impact. The cumulative loss of agricultural soils was discussed in the Final EIR for the 2040 General Plan. That EIR concludes that there would be a significant loss of agricultural soils as a result of future development under the 2040 General Plan and, although the General Plan contains policies and programs that serve to partially mitigate the cumulative impact, the impact cannot be reduced to a less-than-significant level and remains cumulatively significant. In accordance with Section 15183 of the CEQA Guidelines, although the Project would result in a significant impact related to agricultural land conversion, additional cumulative environmental analysis is not required for any project that is consistent with the General Plan, including the proposed Project (Ventura County 2020).

4.2 Transportation & Circulation – VMT

This section analyzes the existing and future vehicle miles traveled (VMT) conditions for the proposed Project and assesses the Project's impact on VMT for the purpose of addressing consistency with CEQA Guidelines Section 15064.3, subdivision (b). This section only evaluates the potential effects of the Project on transportation relative to VMT, all other transportation-related impacts were analyzed in the Initial Study (IS) for the Project (Appendix A) and are summarized in Section 4.3, *Less Than Significant Environmental Effects.* The analysis in this section is based in part on an Air Quality, Climate Change Impact and Health Risk Assessment prepared for the Project by Sespe Consulting, Inc. (Sespe) in May 2017. The full Sespe assessment is provided in an attachment to the IS (Appendix A, Attachment 4).

4.2.1 Setting

4.2.1.1 Baseline VMT

Agromin currently operates the Project site as a 15-acre green and agricultural materials compost facility, called the Limoneira/Agromin Agricultural Composting Operation, which processes approximately 60,000 tons of green material per year. The Project involves transforming this existing 15-acre operation into a 70-acre commercial composting facility.

Agromin currently also carries out composting operations at its existing, 11-acre Oxnard-Shoreline facility located at 6859 Arnold Road in Oxnard, California. A CUP for continued operation of this facility through December 31, 2030 is currently pending approval from the County. Existing composting operations at the Oxnard-Shoreline facility include windrow composting, preprocessing and grinding, bagging and bulk sales, and mobile and stationary processing equipment. These operations would continue at the facility if the pending CUP is approved. The Oxnard-Shoreline facility does not accept food waste. If the proposed Project is approved, food waste would be sent to the Project site for processing, not the Oxnard-Shoreline facility. The proposed Project would therefore only accommodate any expansion in non-food green material from the Oxnard-Shoreline facility beyond what could be accommodated under its existing CUP and the proposed CUP extension if that is approved.

Baseline VMT includes both the trips currently being generated at the proposed Project site (Limoneira/Agromin Agricultural Composting Operation). Together both the Limoneira/Agromin Agricultural Composting Operation and the Oxnard-Shoreline facility process approximately 113,862 tons of green material per year. VMT generated by both the existing Limoneira/Agromin Agricultural Composting Operation and the Oxnard-Shoreline facility include incoming trips from incoming green and food material collected ("incoming waste"), incoming deliveries, outgoing sales, and employees. In addition, 181,138 tons of green and food material per year currently going to the Toland Road Landfill is first delivered by trash trucks to the Gold Coast Materials Recovery Facility (MRF), located on Colt Street in Ventura, where it is separated from other refuse. It is then transported to the landfill in transfer trailers. Accordingly, these two trip segments are included in the baseline trip distances since these trips of material currently going to the landfill will be replaced by trips to the Project site. Please see Appendix C, *Vehicle Miles Traveled (VMT) Analysis*, for further assumptions used by Sespe to calculate baseline trip distances associated with current material travel to Agromin's existing operations at the Limoneira/Agromin Agricultural Composting Operation and the Oxnard-Shoreline facility and to the Toland Road Landfill.

As shown in Table 4.2-1, baseline VMT is 1,798,126 annual VMT, or 7,681 peak day VMT. A majority of the VMT is generated by movement of waste going to the Gold Coast MRF and then the Toland Road Landfill, accounting for approximately 915,522 annual VMT or 3,873 peak day VMT. Table 2 of the *Vehicle Miles Traveled (VMT) Analysis* provided in Appendix C outlines further information on VMT per year and peak day VMT based on trip type and average distance per roundtrip.

Table 4.2-1 Baseline Vehicle Miles Traveled (VMT)

Category	VMT Per Year	Peak Day VMT
Incoming Waste	355,272	1,356
Incoming Deliveries	34,626	452
Outgoing Sales	228,546	1,020
Employees	264,160	980
Existing to Landfill	915,522	3,873
Total Baseline VMT	**1,798,126**	**7,681**

See Appendix C of this EIR, *Vehicle Miles Traveled (VMT) Analysis*, for further details

Source: Sespe Consulting, Inc. 2017; Appendix A, Attachment 4

4.2.1.2 Regulatory Setting

State Regulations

SENATE BILL 743 – TRANSPORTATION IMPACTS

Senate Bill (SB) 743 was signed into law on September 27, 2013 and directed the Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. SB 743 was enacted, in part, as further implementation of California's Scoping Plan to meet California Global Warming Solutions Act (Assembly Bill 32) greenhouse gas (GHG) emission reduction targets. SB 743 seeks to reduce criteria air pollutants and GHG emissions in the transportation sector by reducing VMT. SB 743 changed the approach to transportation impact analysis by establishing measures such as VMT, VMT per capita, or automobile trip generation rates as the primary measures of transportation impacts under CEQA and eliminates the traditionally used measures of vehicle delay, level of service (LOS), and other measures of traffic congestion as a basis for determining significant impacts.

In December 2018, OPR adopted and promulgated its changes to the CEQA Guidelines (14 California Code of Regulations Section 15000 et seq.) in response to SB 743. Section 15064.3 contains the operative language for implementing the goals of SB 743 when determining the significance of a project's transportation impacts. There are four key aspects of Section 15064.3 that apply in the case of the proposed Project:

1. "[A] project's effect on automobile delay shall not constitute a significant environmental impact." See Section 15064.3(a).
2. "A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure." See Section 15064.3(b)(4)
3. The terms and conditions of Section 15064.3 apply prospectively and a lead agency "may elect to be governed by the provisions of [15064.3] immediately. Beginning on July 1, 2020, the provisions of [15064.3] shall apply statewide." See Section15064.3(c).

Local Regulations

VENTURA COUNTY NON-COASTAL ZONING ORDINANCE

SEC. 8109-0.7 – TRANSPORTATION DEMAND AND TRIP REDUCTION MEASURES

Section 8109-0.7 discusses the minimum requirements prior to the approval of discretionary development as it relates to standards for transportation demand management (TDM) and trip reduction measures. These standards provide an opportunity to reduce VMT and encourage mode shift to non-vehicular travel modes. Section 8109-0.7 outlines standards for non-residential development serving 40 or more employees, non-residential development serving 110 or more employees, and residential development. The existing composting operation at the Project site currently has 11 full-time employees. The proposed Project would increase the total number of full-time equivalent employees to 37 (a net increase of 26 employees). Since the Project would employ 37 people, this section is not applicable to the proposed Project.

Ventura County General Plan

CIRCULATION, TRANSPORTATION, AND MOBILITY ELEMENT

The following policies from the 2040 General Plan *Circulation, Transportation, and Mobility Element* are applicable to the proposed Project.

- **Policy CTM-1.1: Vehicle Miles Traveled (VMT) Standards and CEQA Evaluation.** The County shall require evaluation of County General Plan land use designation changes, zone changes, and discretionary development for their individual (i.e., project-specific) and cumulative transportation impacts based on VMT under the CEQA pursuant to the methodology and thresholds of significance criteria set forth in the County Initial Study Assessment Guidelines.
- **Policy CTM-1.2: Projects with Significant Transportation Impacts.** County General Plan land use designation changes, zone changes, and discretionary development that would cause an individual (i.e., project-specific) or cumulative significant transportation impact based on VMT under the CEQA shall be prohibited unless:
    1. There are no feasible mitigation measures available that would reduce the impact to a less-than-significant level; and
    2. The County's decision-making body, after balancing, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the project against its unavoidable transportation impact and any other environmental risks, determines that the benefits of the project outweigh the unavoidable adverse environmental impacts and adopt a statement of overriding considerations pursuant CEQA.
- **Implementation Program CTM-B:** The County shall update and adopt its Initial Study Assessment Guidelines (ISAG) no later than 2025 to address VMT and safety metrics pursuant to CEQA Guidelines Section 15064.3. This program shall consider inclusion of the following components:
    - Establishment of screening criteria to define projects not required to submit detailed VMT analysis, such as infill projects, inclusion of locally serving commercial, transit supportive projects, or transportation enhancements that reduce VMT;

- Establishment of thresholds of significance for identifying VMT-related transportation impacts to meet or exceed California requirements; at minimum the thresholds will be equivalent to the threshold values for different project types identified in Mitigation Measure CTM-1;
- Standard mitigation measures for significant transportation impacts; and
- Specify the County's procedures for reviewing projects with significant and unavoidable impacts, under CEQA, related to VMT.

- **Implementation Program CTM-C: Vehicles Miles Traveled Reduction Program:** To support climate change related goals and CEQA related VMT policies pursuant to SB 743 (2013), the County shall develop a VMT Reduction Program no later than 2025. This program will contain a range of project- and program-level mitigation measures and VMT reduction strategies that could include:
  - Preparation of a Transportation Demand Management (TDM) program to promote mode shifts from single occupant vehicle use to transit, ridesharing, active transportation, telecommuting, etc.; and,
  - Transportation System Management applications such as park-and-ride lots, intelligent transportation system (ITS) field deployment, pavement management, etc.

  This program shall identify measures to achieve an additional 5 percent overall reduction in VMT by 2030, and 10 percent by 2040 relative to 2030 and 2040 business as usual scenarios, respectively. During implementation of the 2040 General Plan, the County will review and update the VMT Reduction Program as warranted to provide additional mitigation measures and programs that achieve these levels of VMT reduction.
- **Implementation Program CTM-P: Interim VMT CEQA Assessment Criteria.** Following June 30, 2020 and prior to completion of Implementation Program CTM-B, all projects (not otherwise exempt from CEQA analysis) shall be evaluated for potential environmental impacts relative to VMT using the State's minimum reduction standards, as follows [see Table 4.2-2]:

  If a proposed project is found to have a significant impact on VMT, the impact must be reduced, as feasible[1], by modifying the project's VMT to a level below the established thresholds of significance and/or mitigating the impact through multimodal transportation improvements or mitigations to enhance transportation mode shift (use of alternative transportation modes). Following completion and adoption of VMT thresholds as part of the Ventura County ISAG, this implementation program shall no longer apply.

[1] "Feasible" means that the mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, Section 21066.1) and the CEQA Guidelines (Section 15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

Table 4.2-2 Interim Vehicle Miles Traveled (VMT) CEQA Assessment Criteria

Project Type	Measurement Unit	Model Trip Type	Minimum Criteria	Baseline VMT	Threshold of VMT
Residential	VMT per Capita	Average of All Home Based Trip Types	15 Percent Reduction of Regional Average	9.66	9.66
Office	VMT per Employee	Home Based Work Trips	15 Percent Reduction of Regional Average	13.52	13.52
Industrial	VMT per Employee	Home Based Work Trips	15 Percent Reduction of Regional Average	13.52	13.52
Retail	Unincorporated VMT	All Trip Types	No Net Increase in Regional VMT	7,500,249	7,500,249
Agriculture	Unincorporated VMT	All Trip Types	No Net Increase in Regional VMT	7,500,249	7,500,249
Infrastructure	Unincorporated VMT	All Trip Types	No Net Increase in Regional VMT	7,500,249	7,500,249
All Other Project Types	Unincorporated VMT	All Trip Types	No Net Increase in Regional VMT	7,500,249	7,500,249

VMT=Vehicle Miles Traveled

Source: County of Ventura 2020

4.2.2 Impact Analysis

4.2.2.1 Significance Thresholds

Methodology

VEHICLE MILES TRAVELED

As outlined above, Section 15064.3 of the CEQA Guidelines states that a project's effect on automobile delay shall not constitute a significant environmental impact, and VMT is the required metric to be used for identifying CEQA impacts and mitigation, instead of a congestion metric (such as LOS). While some jurisdictions may choose to retain LOS standards as a project's condition of approval, CEQA impacts and/or mitigation measures are no longer based on changes to LOS.

As noted in the current CEQA Guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. As outlined above, the County of Ventura has adopted formal interim thresholds in Implementation Program CTM-P: Interim VMT CEQA Assessment Criteria. The proposed Project is an infrastructure project, since it would serve a public need for waste reduction and also provide a commercial service for other land uses in the county (personal comm. John Oquendo, Senior Planner, County of Ventura, Resource Management Agency, November 5, 2020). According to the Project applicant (personal comm. Rob Dal Farra, Vice President, Sespe Consulting, Inc, April 5, 2020), Agromin's wholesale services include sales to customers that have ongoing accounts with them. This includes commercial landscapers, agricultural clients, etc. These clients could either come to the facility with their own trucks to pick up product (mulch, compost, etc.) or Agromin could deliver it to them in transfer trailers, bobtail trucks, roll-off bins, etc. Their retail sales clients would include will call

clients that come to the site and purchase product each visit or could also include retail stores that purchase their bagged products. In that case, Agromin would deliver product to the stores using a bobtail truck.

Because, as described above, it is an infrastructure project and would provide a commercial service for other land uses in the county, consistent with Implementation Program CTM-P, a no net increase in regional VMT threshold of significance was applied to the Project.

Although the County has adopted thresholds of significance for VMT impacts within the Circulation policies of the 2040 General Plan, it has not yet adopted a methodology for VMT analyses. The OPR in December of 2018 released a *Technical Advisory on Evaluating Transportation Impacts in CEQA*. This guidance provides technical recommendations regarding assessment of VMT, thresholds of significance, and potential mitigation measures. The OPR technical advisory recommends a trip- or tour-based VMT analysis over boundary-based VMT analysis as the established and most appropriate methodology for analyzing VMT impacts under CEQA. Trip-based assessment of VMT captures the full extent of the vehicle trip length, including the portion that extends beyond the jurisdictional boundary. VMT impacts are assessed by quantifying trips to or from a jurisdiction, which start or end within the jurisdiction. Conversely, a boundary-based assessment of VMT impacts is quantified by the length of the vehicle trips that occur within the boundaries of a jurisdiction. The following VMT analysis for baseline and Project VMT utilizes a trip-based assessment.

Significance Thresholds

As stated above, the 2040 General Plan Policy CTM-1.1: VMT Standards and CEQA Evaluation addresses the determination of significance and directs that VMT is generally the most appropriate measure of transportation impacts, and that this VMT impact analysis should be carried out pursuant to the methodology and thresholds of significance criteria set forth in the Ventura County ISAGs. As a result, impacts related to VMT would be potentially significant if the proposed Project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

All other transportation and circulation impacts are discussed in Section 4.3, *Less Than Significant Environmental Effects* as well as the Initial Study for the Project (Appendix A).

4.2.2.2 Project Impacts and Mitigation Measures

Threshold 1: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Impact T-1 IMPLEMENTATION OF THE PROJECT WOULD RESULT IN A NET INCREASE IN VMT. ALTHOUGH IMPLEMENTATION OF MITIGATION WOULD REDUCE THIS IMPACT, THE IMPACT WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.

As outlined above, consistent with Implementation Program CTM-P, a no net increase in regional VMT threshold of significance is the appropriate VMT threshold of significance under CEQA for infrastructure projects, such as the proposed Project. This analysis discusses the Project's anticipated VMT based on the guidance available in OPR's Technical Advisory and the Air Quality, Climate Change Impact and Health Risk Assessment prepared for the Project by Sespe (May 2017).

The proposed Project would result in new VMT. As shown in Figure 4.2-1, trips coming into the facility would include materials collected from the County of Ventura and City of Carpinteria, employee trips, and supplies vendors traveling to the site. Collection sources include a combination

of food material and green material. Sources of food material would include commercial trips that would come directly from various sources as well as from collection vehicles. Green material would come to the facility either from the Gold Coast MRF, residential green material sources (including directly from residences and green material from collection vehicles), and contractor/agricultural/landscape material that would come directly from various sources. Outgoing trips from the facility would include mulch bulk sales, finished product bulk sales, bagged materials, wood shipped off-site for biofuels, as well as employees, suppliers, and collection vehicles leaving the facility. Incoming and outgoing trips also include an average of approximately 10 visitors per day to the site, accounting for the Project's educational component.

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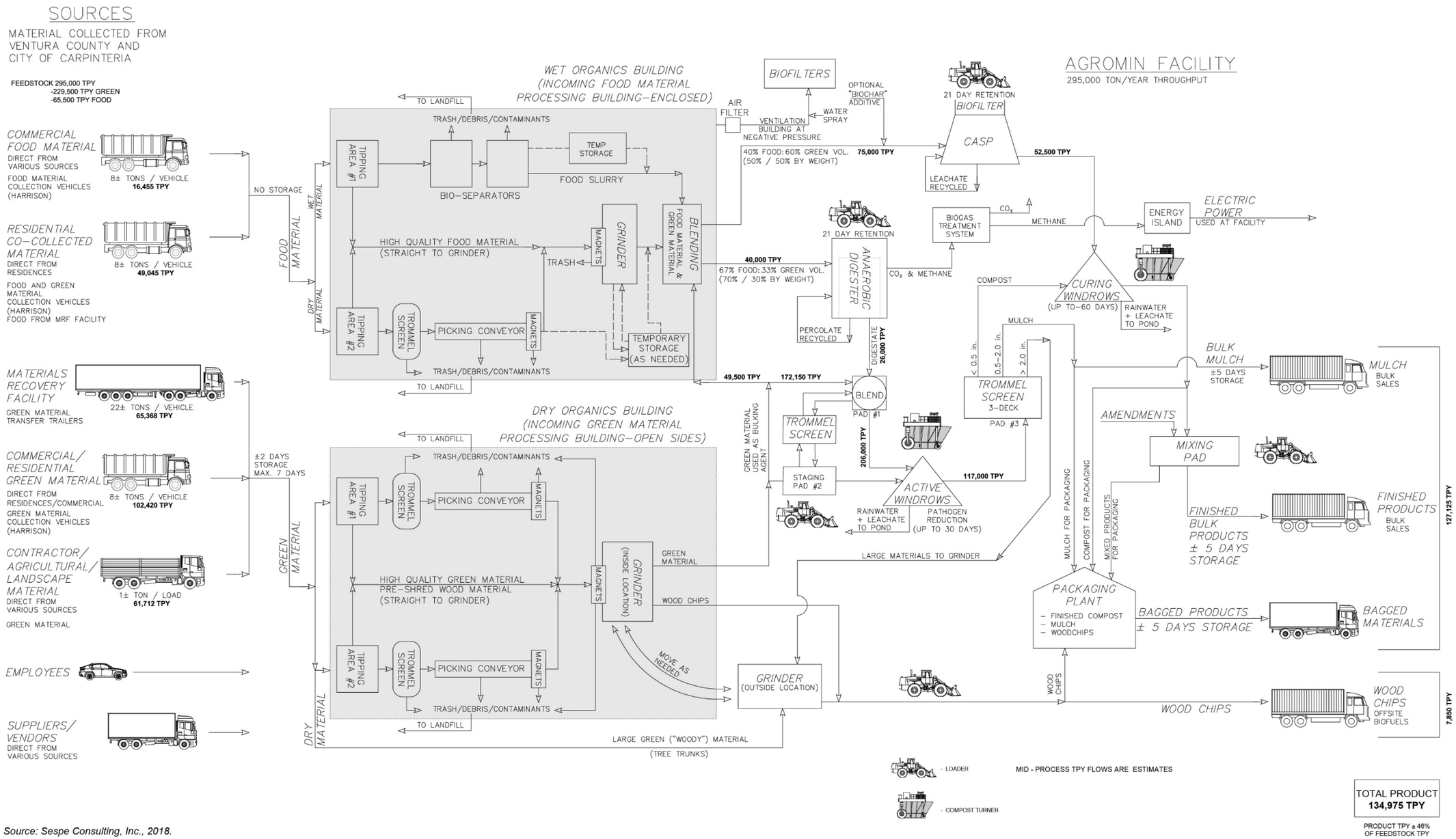
Figure 4.2-1 Process Flow Diagram



Source: Sespe Consulting, Inc., 2018.

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Table 4.2-3 below outlines the Project's calculated VMT. The Project would result in approximately 2,392,308 annual VMT, or approximately 10,577 peak day VMT. Since green and food material would be delivered directly to the Project site, the VMT previously generated due to 181,138 tons of green and food material per year waste going to the Gold Coast MRF, and then the Toland Road Landfill under baseline conditions ("Existing to Landfill" in Table 4.2-1) would now go directly to the Project site. However, since this 181,138 tons per year of green and food material would now go directly to the Project site rather than going to the Toland Road Landfill, the incoming waste to the Project site would increase compared to baseline conditions (from approximately 113,862 tons per year managed at both the Limoneira/Agromin Agricultural Composting Operation and the Oxnard-Shoreline facility to approximately 295,000 tons per year being managed at both facilities). As a result, the VMT from incoming material and incoming deliveries also would increase. In addition, since there would be an increase in compost produced and sold, there would also be a net increase in outgoing sales, although the average trip distance may also decrease since those purchasing compost in bulk would no longer have to travel to the Oxnard-Shoreline facility because they would also have the option of doing so at the Project site, resulting in a net decrease of 6 miles average roundtrip distance (see Appendix C). Lastly, the proposed Project would require an additional 26 employees (37 employees needed minus 11 employees at the existing facility), which also would result in an increase in VMT.

Table 4.2-3 Project Vehicle Miles Traveled (VMT)

Category	VMT Per Year	Peak Day VMT
Incoming Waste	1,451,119	6,290
Incoming Deliveries	82,980	603
Outgoing Sales	535,809	2,304
Employee	322,400	1,380
Total Project VMT	**2,392,308**	**10,577**

See Appendix C of this EIR, *Vehicle Miles Traveled (VMT) Analysis*, for further details

Source: Sespe Consulting, Inc. 2017; Appendix A, Attachment 4

As outlined in Table 4.2-4, the proposed Project would generate an increase of 594,182 VMT per year and a peak day increase of 2,896 VMT per day, despite diverting trips associated with the 181,138 tons per year of green and food material from the Gold Coast MRF and Toland Road Landfill to the Project site and despite the fact that it would result, on average, in shorter trip lengths for those purchasing compost from the Limoneira/Agromin Agricultural Composting Operation. This increase in VMT is due to the increase in incoming waste and deliveries, the additional compost being sold, and the increase in employees. As identified above, Implementation Program CTM-C: Vehicles Miles Traveled Reduction Program directs the County to establish a range of project- and program-level mitigation measures and VMT reduction strategies. However, this program has yet to be developed by the County. As a result, this net increase in VMT would result in a significant impact.

Table 4.2-4 Summary of Net Increase in Vehicle Miles Traveled (VMT)

Total VMT	VMT Per Year	Peak Day VMT
Baseline	1,798,126	7,681
Project	2,392,308	10,577
Net Increase in VMT	**594,182**	**2,896**

Mitigation Measures

TRANS-1 Implement Measures to Reduce VMT

Purpose: To achieve consistency with the "no net increase" threshold of Ventura County General Plan Implementation Program CTM-P: Interim VMT CEQA Assessment Criteria

Requirement: The Applicant will take all feasible actions to reduce the Project's VMT. The Applicant shall specify feasible measures to reduce the Project's VMT and shall provide an estimate of the VMT reduction that would result from each measure. OPR's Technical Advisory recommendations include the following measures to reduce VMT that may be applicable to the proposed Project:

- Provide bicycle parking
- Implement or provide access to a commute reduction program
- Provide car-sharing, bike-sharing, and ride-sharing programs
- Shifting single-occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services
- Provide incentives or subsidies that increase the use of modes other than single-occupancy vehicle
- Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms
- Provide employee transportation coordinators at employment sites

Prior to issuance of the first building permit for the Project, the applicant shall submit a report to the County Planning Division describing which of these actions, or other VMT-reducing actions, it will take to help reduce the VMT specifically related to the Project. This report shall also describe why the selected actions were chosen, provide an estimate of the amount of expected VMT reduction from each action and the total estimated VMT reduction from all actions, and, if the chosen actions would not reduce VMT increases to a less than "net zero" increase from existing conditions, describe why further actions to reduce VMT increases to "net zero" were determined to be infeasible. The County Planning Division and the Public Works Agency, Transportation Department shall be responsible for approving this report prior to issuance of the first building permit for the Project.

Documentation: The applicant shall submit a report to the County Planning Division describing what VMT-reducing actions it will take to help reduce the VMT specifically related to the Project, consistent with the requirements of this mitigation measure.

Timing: Prior to issuance of the first building permit for the Project.

Monitoring and Reporting: The County Planning Division and the Public Works Agency, Transportation Department shall be responsible for approving this report and confirming that it complies with the requirements of this mitigation measure.

Significance After Mitigation

Implementation of Mitigation Measure TRANS-1 would reduce impacts due to VMT to the extent feasible, especially VMT generated by additional employee trips. However, the infrastructure/community serving land use context of the Project and its relatively isolated location limit opportunities for alternative modes of transportation such as carpooling, transit, biking, and walking, makes meaningful reductions in VMT difficult to achieve. There are no actions or policies that the County could feasibly mandate to fully reduce the VMT generated by the proposed Project. While Mitigation Measure TRANS-1 could potentially result in a "net zero" increase if the applicant can find feasible actions to achieve this goal, there is no feasible mitigation currently available that can be shown to reduce the Project's net change in VMT to zero or less, and the Project's VMT impact is expected to remain significant and unavoidable.

4.2.2.3 Cumulative Impacts

Increased VMT was discussed in the Final EIR for the 2040 General Plan. That EIR concludes that there would be significant VMT-related impacts as a result of future development under the 2040 General Plan, and, although the General Plan contains policies and programs that serve to partially mitigate the cumulative impact, the impact cannot be reduced to a less-than-significant level and remains cumulatively significant. In accordance with Section 15183 of the CEQA Guidelines, although the Project would result in a significant impact related to VMT, additional cumulative environmental analysis is not required for any Project that is consistent with the General Plan, including the proposed Project (County of Ventura 2020).

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4.3 Less Than Significant Environmental Effects

CEQA Guidelines Section 15128 requires an EIR to briefly describe any possible significant effects that were determined not to be significant and therefore were not discussed in detail in the EIR. This section addresses the potential environmental effects of the proposed Project that clearly would not be significant and are not addressed in the preceding sections of this EIR.

The findings of this section are based on the Initial Study (IS) completed for the proposed Project (Appendix A), which determined that the proposed Project would result in no impact, a less than significant impact, or a less than significant impact with incorporation of mitigation measures described in the IS in all environmental issue areas included in the County's Initial Study Assessment Guidelines (County of Ventura 2011), except for Agricultural Resources – Soils and Transportation & Circulation. In addition, this section of the EIR also discusses Energy, per Appendix G of the CEQA Guidelines. Any items not addressed in this section are addressed in Section 4.1, *Agricultural Resources – Soils*, and in Section 4.2, *Transportation & Circulation (VMT)*, of this EIR.

4.3.1 Air Quality

The proposed Project includes a CUP and NCZO Text Amendment to permit the expansion of an existing 15-acre agricultural organics processing facility to a new 70-acre commercial organics processing operation. The existing compost operations at both the Project site and Agromin's existing 11-acre Oxnard-Shoreline facility are considered part of the baseline/existing conditions used to evaluate the proposed Project for incremental air quality impacts. See Section 2.5.9 of this EIR for further information about current and planned future operations at the Oxnard-Shoreline facility.

Also included in the baseline assumptions are existing landfill emissions based on the volume of divertible compostable material in the absence of the Project. This baseline assumption, or emission offset, is reasonable to assume, because the location of the organic material destination is known, and there is only one residential waste hauling company (E.J. Harrison & Sons) taking the organic material in the unincorporated areas of western Ventura County to landfill locations.[1]

As described in the IS (Appendix A), operation of the proposed Project would not result in ozone precursor emissions above the Ventura County Air Pollution Control District's (VCAPCD) thresholds, and the Project would result in lower toxic air contaminants than under existing operations at the site.

The proposed commercial organic processing facility would handle compostable material feedstock (food and green material) and active windrow composting, which has the potential to generate odors that impact nearby sensitive receptors (Todd Road Jail located 0.6 mile to the northeast, and sensitive receptors adjacent to the proposed CUP boundary). However, the Project would process all incoming food material in an enclosed building (i.e., "Wet Organics Building") that would be equipped with a negative-pressure blower system to prevent all odors and emissions from escaping the building. The negative-pressure ventilation system would force air pollutants and odors through a biofilter located outside which is proposed to have a 90 percent control efficiency. In addition, the Project Applicant's consultant prepared an Odor Impact Minimization Plan in compliance with California Code of Regulations (CCR) Title 14, Section 17863.4 (Compost Material Handling Facilities)

[1] The 10 cities each have their own respective hauling contracts, and Cities of Port Hueneme and Oxnard haul for their own cities. Commercial contracts within the Unincorporated Ventura County are non-exclusive and any County-franchised commercial waste haulers can serve anywhere within the unincorporated areas of Ventura County for all material types (trash, recycling, organics/green waste).

and VCAPCD requirements for assessments of odor related Project impacts. Additionally, as described below and in the IS, the Project includes design features and would be subject to mitigation measures that would ensure compliance with odor nuisance requirements.

Fugitive dust may be generated from the proposed compost processing operations and by delivery trucks entering and exiting the facility. However, it is not expected to be significant, because the Project roadways, scale house, and administration building lot would be paved with asphalt, the tipping/staging areas would be paved with cement, and the windrow and feedstock areas would be laid with cement-treated native soil. In addition, full implementation and adherence to the Dust Control Plan and VCAPCD Rules 51, Nuisance, and 55, Fugitive Dust would minimize fugitive dust.

While the Project would increase employment at the Project site, any associated population increase would not exceed the growth forecasts for the unincorporated county upon which the 2016 Air Quality Management Plan is based and would not conflict with or obstruct the most recent Air Quality Management Plan.

Additionally, the IS provides three mitigation measures to ensure air quality emissions impacts would be less than significant: AQ MM-1, Dust Prevention, AQ MM-2, Nuisance, and AQ MM-3, Permits Required. Therefore, air quality impacts would be less than significant with mitigation incorporated.

4.3.2 Water Resources

Groundwater Quantity

The City of Santa Paula would supply water to the Project via an upgraded water pipeline located off-site from the southeastern Project boundary on Roger Road, northwest along a private roadway, and east along Gaythorne Road. The City uses groundwater from wells located in the Santa Paula Basin. The Project would result in increased impervious surfaces on the site, which would decrease groundwater recharge that currently occurs from Project site crop irrigation as well as rainwater infiltration. The Project proposes to capture and store rainwater to supplement composting operational water needs in the proposed on-site retention basins, resulting in a net reduction in groundwater use. Therefore, the proposed Project would not directly or indirectly decrease, either individually or cumulatively, the net quantity of groundwater in a groundwater basin that is overdrafted or create an overdrafted groundwater basin and would result in a less-than-significant impact on groundwater quantity.

Groundwater Quality

The Project is required to comply with State Water Resources Control Board (SWRCB) Order WQ-2015-0121-DWQ, General Waste Discharge Requirements for Composting Operations. Project construction is required to comply with Standard Condition No. 172, Containment Area for Compost Processing Operations. Compliance with these requirements would reduce potential impacts from leaching to groundwater to less than significant.

The proposed Project includes installation of multiple on-site wastewater treatment system (OWTS) septic systems, which are required to be permitted by the County of Ventura Environmental Health Division (EHD); discharges are regulated by the Regional Water Quality Control Board. Properly installed and maintained OWTS would reduce potential impacts from groundwater contamination to less than significant and not cause groundwater to exceed groundwater quality objectives set by the Los Angeles Region Basin Plan.

Surface Water Quantity

The Project would not use surface water, as all water would be provided by the City of Santa Paula, which relies on groundwater supplies. No impact would occur.

Surface Water Quality

The Todd Barranca and Ellsworth Barranca tributaries to the Santa Clara River (SCR) flow along the east and west boundaries of the Project site. The SCR has documented water quality impairments and effective Total Maximum Daily Loads to address the bacteria and chloride impairments. The Project would disturb approximately 70 acres, replacing existing lemon orchards with approximately 34.26[2] acres of impervious surfaces. Runoff pollution from the proposed impervious surfaces has the potential to contribute to the exceedances of water quality objectives in downstream waterbodies. The Project has an individual and cumulative potential to exceed the threshold for significance related to the water quality objectives of the Los Angeles Region Basin Plan. Incorporation of the mitigation measure CSWP MM-1, Post-Construction Best Management Practices (provided in the IS, Appendix A) would ensure individual and cumulative impacts to existing impaired downstream waterbodies, and water quality objectives would be minimized.

The Project would be required to comply with Ventura Countywide Municipal Stormwater National Pollutant Discharge Elimination System (NPDES) Permit CAS004002, "Development Construction Program," Subpart 4.F, which requires inclusion of Best Management Practices (BMPs) such as erosion and sediment control measures. Project construction activities would also be required to obtain coverage under the NPDES General Construction Permit (No. CAS000002). The Project would also be required to comply with SWRCB Order WQ-2015-0121-DWQ, General Waste Discharge Requirements for Composting Operations. As such, neither the individual Project threshold nor the cumulative threshold for significance would be exceeded and the Project would result in a less than significant impact.

4.3.3 Mineral Resources

Aggregate

While the Project site is located adjacent to Mineral Resource Zone (MRZ)-2[3] zoned lands, no active surface mining presently occurs within the vicinity of the site. The proposed Project would not restrict access to an aggregate extraction site or otherwise preclude the extraction of mineral resources. Therefore, no impact would occur.

Petroleum

An existing oil production well and an idle oilfield injection well are located near the center of the current permit boundary (offset from the entrance at Edwards Ranch Road, near the open windrow composting operations) of the existing Agricultural Material Composting Operation. The new buildings included in the Project are not within 100 feet of existing extraction facilities. While the Project site is located within the boundary of the Saticoy Oil Field and adjacent to multiple land use

[2] As discussed in Section 4.1.3.2 of this EIR, 34.26 acres of the Project site would be converted from agricultural production to impermeable surfaces (paved areas and proposed buildings), while approximately 21 acres of the site would be converted from agricultural production to permeable surfaces (landscaping, retention basins, and native soil areas (including areas covered by composting piles)

[3] Areas underlain by mineral deposits where geologic data shows that significant measured or indicated resources are present (California Department of Conservation 2020).

permits allowing petroleum extraction, the proposed Project would support access to the existing oil wells as required by the CalGEM. The proposed Project would not preclude physical access to the Saticoy Oil Field and the Project would result in less-than-significant impacts to petroleum resources.

4.3.4 Biological Resources

Special-Status Species

Biological assessment surveys were conducted at the Project site by BioResource Consultants, Inc. (BRC), a Ventura County Qualified Biology Consulting firm, on July 15, July 23, and July 30, 2014, and December 3, 2015. The Biological Assessment prepared by BRC following these surveys identified non-native agricultural crops, non-native weedy plant species, an unnamed ephemeral drainage, drainage channel, and windrow of eucalyptus trees on the Project site. No locally important or rare plant communities were found. Because of the developed nature of the Project site, no natural areas are present that provide suitable habitat for special-status plant species to occur. Therefore, Project development would not likely impact one or more plant species by reducing the species' population, reducing its habitat, fragmenting its habitat, or restricting its reproductive capacity. Impacts to plants would be less than significant.

The Biological Assessment provides a detailed description of federally- and state-listed species' potential to occur on the Project site. Database searches conducted by BRC found suitable habitat for monarch butterfly (*Danaus plexippus*), coast horned lizard (*Phrynosoma blainvillii*), and silvery legless lizard (*Anniella pulchra pulchra*). In addition, suitable habitat for nesting birds occurs on the Project site.

The eucalyptus trees could provide habitat for monarch butterfly; therefore, the IS (Appendix A) provided mitigation measure BIO MM-1, Pre-construction Surveys & Construction Monitoring for Monarch Butterfly, which requires pre-construction surveys and monitoring of construction activities during the roosting season for such butterflies. Impacts would be less than significant with mitigation.

Potentially suitable coast horned lizard and legless lizard habitat is present within the existing citrus orchards; therefore, the IS provided mitigation measure BIO MM-2, Pre-construction Surveys and Relocation of Special-Status Reptile Species, which requires pre-construction surveys and relocation of these lizards, if found within the proposed CUP area. Impacts would be less than significant with mitigation.

No special-status bird species were detected during the site surveys. However, the agricultural crops and the row of eucalyptus trees on the eastern edge of the proposed CUP boundary provide suitable roosting and nesting habitat for a variety of birds; therefore, the IS identified the standard condition of approval requiring pre-construction nesting bird surveys when construction would occur during the nesting season. Impacts would be less than significant.

Ecological Communities

Sensitive Plant Communities

The Biological Assessment surveys found that no sensitive plant communities occur on the Project site. Therefore, the Project would not temporarily or permanently remove sensitive plant communities through any of the proposed construction activities and operation of the proposed

Project would not result in any indirect impact that would degrade the health of a sensitive plant community.

Waters and Wetlands

The concrete-lined drainage channel along the eastern boundary of the Project site is identified as "waters of the state" and "waters of the U.S." regulated under Section 1602 of the California Fish and Wildlife Code and Section 404 of the Clean Water Act. The Project has incorporated a 50-foot setback between the channel and proposed structures. Therefore, no impacts to the channel are anticipated from proposed construction or operation of the facility. Ventura County Conservation and Open Space General Plan Policy COS-1.11 requires a 100-foot buffer from significant wetland habitat. The Project will not result in a significant impact due to the heavily disturbed nature of the drainage channel, which lacks vegetation or riparian habitat and to which the facility would not drain.

In addition, the central portion of the parcel is an unnamed ephemeral drainage that traverses the parcel in a northeast to southwest orientation; this drainage is considered waters of the state. However, the drainage is an upland-excavated drainage ditch that only drains uplands and is not considered waters of the U.S. This feature is not jurisdictional. Although the Project would fill the unnamed drainage and install a double barrel arch pipe pass-through, no native plants or wildlife habitat are located at the drainage, and habitat loss would not occur as a result of this modification. However, the IS (Appendix A) provided mitigation measure BIO MM-3, California Department of Fish and Wildlife (CDFW) Lake & Streambed Alteration Agreement (LSAA), which requires the Applicant to obtain a Lake and Streambed Alteration Agreement to comply with California Fish and Game Code Section 1602. Impacts would be less than significant.

Environmentally Sensitive Habitat Areas

The Project site is not in the Coastal Zone; therefore, Environmentally Sensitive Habitat Area policies and analysis does not apply to the Project.

Habitat Connectivity

The SCR is located along the southern edge of the Project site, approximately 0.25 mile south of the proposed CUP boundary. The river supports the Santa Monica-Sierra Madre Wildlife Corridor, a mapped wildlife corridor of high significance for wildlife movement. The southern boundary of the proposed CUP area is located approximately 800 feet from the edge of the riparian corridor, which is a sufficient buffer distance between the operational limits of the Project and the riverine habitat that supports wildlife movement. The Project would not remove habitat within the river corridor or modify the river ecosystem. Therefore, proposed Project development would not result in direct impacts to Santa Monica-Sierra Madre wildlife corridor and wildlife movement. However, lighting of the facility operations may impair wildlife movement of animals that may incidentally use the river corridor next to the Project site. The IS (Appendix A) provides mitigation measure BIO MM-4, Lighting Plan, which requires the preparation and implementation of a Lighting Plan to protect wildlife movement. Therefore, impacts would be less than significant with mitigation incorporated.

Other

The IS (Appendix A) determined that the Project would be consistent with the Ventura County General Plan Goals, Programs, and Policies. Consistent with Ventura County General Plan Biological Resources Policy 1.5.2.1, biological assessment surveys were conducted at the Project site by BRC.

As described above, implementation of MM BIO-3 is expected to offset impacts to the unnamed ephemeral drainage. With regard to the applicable General Plan Goals and Policies, the proposed Project would not involve the removal of special-status plant or animal species. Additionally, an Initial Study Biological Assessment was prepared for the Project in conformance with the County's Initial Study Assessment Guidelines. The Biological Assessment identifies impacts to suitable habitat (monarch butterfly, silvery legless lizard, and coast horned lizard) and permanent impacts to waters of the state; however, mitigation has been added to the Project which would reduce impacts below the threshold of significance. The proposed Project is therefore consistent with applicable General Plan Goals and Policies and impacts would be less than significant with mitigation incorporated.

4.3.5 Agricultural Resources – Land Use

While the proposed use of the Project site is not listed under the Ventura County Agriculture or Agricultural Operations category, the Project includes approval of a CUP, which would allow the proposed uses. Ventura County's Agricultural/Urban Buffer Policy requires a 300-foot setback and chain-link fence, or a 150-foot buffer/setback if a vegetative screen is used, between non-farming activities and agriculture land uses. The proposed Project (compost piles and the proposed facility buildings) would be approximately 48 feet from adjoining agricultural uses.

On October 7, 2019, the proposed Project was presented to the Agricultural Policy Advisory Committee and the Agricultural Commissioner, where the Applicant requested a reduced buffer from the 300-foot setback requirement (see Section 2.5.5 for more information on the reduced buffer included in the proposed Project). The Agricultural Policy Advisory Committee recommended Project requirements, such as installation of a vegetative screen, chain link fence, coordination of agricultural spraying schedules, and posting of the Right-to-Farm Ordinance at the Project site.

4.3.6 Scenic Resources

The Project site is not located within the Scenic Resource Protection Overlay Zone; however, it is approximately 0.25 mile north of the SCR and 0.25 mile south of SR 126, an eligible County scenic highway. The Project is setback from SR 126 such that motorists would only see the upper portion of the Facility Administration Building (35 feet in height) for a brief moment.

Unless there is a reason to enter the SCR, public views from this vantage point would also be limited to the upper portion of the Facility Administration Building. The Project would not obstruct, degrade, or obscure public views of these scenic vistas, either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects. Therefore, the proposed Project would result in less than significant impacts on scenic resources in the viewshed surrounding the Project site.

Views of the site could be affected by proposed lighting and the intensity of proposed uses. mitigation measure BIO MM-4, Lighting Plan, and mitigation measure CULTURAL MM-2, Screening and Landscaping Plan (refer to the IS, Appendix A) require the Applicant to submit a Lighting Plan to the Planning Division and a Landscape Plan with visual screening for review and approval. The Project would also be subject to the County's standard condition of approval requiring building materials and colors to be compatible with the surrounding terrain. The proposed Project would result in less than significant Project-specific impacts and would not result in a cumulatively considerable contribution to a significant cumulative impact related to scenic resources.

4.3.7 Paleontological Resources

The Project site has a low sensitivity for paleontological resources (based on the IS review of the Paleontological Map Series of the RMA GIS and California Department Conservation GIS map). Additionally, the Project would not contribute to the progressive loss of exposed rock. The Project would be subject to the County-required standard condition of approval to ensure the protection of any subsurface paleontological resources if they were to be inadvertently encountered during ground disturbance activities. With the County-required condition of approval for unanticipated paleontological resources impacts would be less than significant.

4.3.8 Cultural Resources

Archaeological

The Project site is not located within either the Very Sensitive or Sensitive areas of the County's Archeological Sensitivity Map, and no past archaeological survey had been performed for the Project site. The Phase I Archaeological Resources Report (Padre Associates, Inc., 2019) conducted for the Project found no archaeological resources previously recorded within 0.5 mile of the Project site, although the site is located in close proximity to the Western Santa Clara Valley Historic District and the Orchard Farm Historic District.

In accordance with Public Resources Code Section 21080.3.1 et seq., on April 11, 2019, a formal request was sent to Native American representatives for consultation regarding the proposed Project's potential impact to tribal cultural resources. On April 12, 2019, Ms. Julie Tumamait-Stenslie, Chair of the Barbareño-Ventureño Band of Mission Indians, requested to review the Phase I Cultural Resources Report. The report was provided to Ms. Tumamait-Stenslie on May 16, 2019. No response has been received from Ms. Tumamait-Stenslie.

Based on the results of the Cultural Phase I Report, no significant archaeological resources exist on the Project site and in the areas proposed for development, and no additional cultural resources surveys would be required for the proposed development. The Project would be subject to the County-required standard condition of approval to ensure the protection of any subsurface resources if they were to be inadvertently encountered during ground disturbance activities. Compliance with this standard condition would ensure that the proposed Project would result in a less-than-significant impact on archaeological resources.

Historic

The Project site has been historically used for agricultural purposes and is presently cultivated with row crops and orchard plantings. The site contains residential buildings and agricultural support structures. The Project site was determined to be a contributor to two National Register of Historic Preservation (NRHP)-eligible historic districts based on a comprehensive survey of the unincorporated western Santa Clara Valley performed in 1996. The site is also approximately 250 feet from Ventura County Landmark No. 2 – The More-Edwards Adobe.

A Phase II Historic Resources Report (HRR) was prepared to assess whether the proposed Project would result in significant adverse impacts on these districts and the designated Ventura County Landmark No. 2. The western Santa Clara Valley was determined to be eligible for listing as a rural historic landscape district as a result of the area's characteristic expression of growth and development related to the area's period of significance (1860-1946) and found that the district was one of the best-preserved examples of a mature Southern California citriculture landscape. The

More-Edwards Adobe (250 feet west of the site), Ranch Residence (25 feet from the site), and Edwards House were determined to be contributing structures to the eligibility determination.

Project-related impacts would include the conversion of 55 acres of land from agricultural use. The existing agricultural use of the property contributes to the significance and eligibility of the western Santa Clara Valley and the Edwards Ranch-Orchard Farm rural historic landscape districts. Implementation of the Project would result in a reduction of design and setting integrity to the districts and should be regarded as resulting in a significant adverse impact on these districts. Similarly, Project operation would introduce activities and buildings in close proximity to buildings that contribute to the significance and eligibility of the historic districts and the More-Edwards Adobe, Ventura County Landmark No. 2, resulting in a substantial loss of integrity of setting for these features. The proposed Project may also result in the further degradation of these buildings which presently exhibit existing signs of deterioration.

On September 23, 2019, the Cultural Heritage Board conducted a public meeting to review the Project. The Cultural Heritage Board found that construction and operational activities associated with the proposed Project may result in adverse impacts to the undesignated potentially eligible historic districts. However, the Cultural Heritage Board found that the Project-related impacts could be mitigated to a less than significant level with the incorporation of recommended mitigation measures CULTURAL MM-1, Historic American Buildings Level-III Photo Survey, and CULTURAL MM-2, Screening and Landscaping Plan (refer to the IS, Appendix A). Mitigation measure CULTURAL MM-1 addresses data recovery and CULTURAL MM-2 requires the Applicant to submit a landscape plan that would introduce a buffer and screen between these structures. Implementation of these mitigation measures would reduce historic resource impacts to less than significant.

No direct impacts to Ventura County Landmark No. 2 (the More-Edwards Adobe) would result from the proposed Project; the Project would not result in demolition or modification of the building and would not involve operational activities that would impact the structure. Project traffic would utilize the Edwards Ranch Road for site access which is approximately 1,200 feet north of Ventura County Landmark No. 2. Additionally, the proposed CUP boundary is approximately 250 feet away from the landmark site.

4.3.9 Coastal Beaches and Sand Dunes

The Project site is located approximately 8.5 miles east of the Pacific Ocean and does not have the potential to adversely impact a coastal beach or sand dune. No impact would occur.

4.3.10 Fault Rupture Hazard

There are no known active or potentially active faults extending through the Project site, and no habitable structures are proposed at this time within 50 feet of a mapped trace of an active fault. No impact would occur.

4.3.11 Ground Shaking Hazard

The site is subject to moderate to strong ground shaking from seismic events on local and regional fault systems. The County of Ventura Building Code requires structures be designed to withstand this ground shaking. The requirements of the building code would reduce the effects of ground shaking on any structures built as part of the proposed Project to less than significant.

4.3.12 Liquefaction Hazards

The site is located within a potential liquefaction zone based on the Ventura County General Plan Hazards Appendix. On-site soils could experience liquefaction and or seismically-induced settlements during a strong seismic event. Liquefaction-related settlement can be reduced by some remedial grading or ground improvement technology (i.e., deep dynamic compaction, cemented deep soil mixed columns, stone columns, etc.). In this regard, the potential hazards resulting from liquefaction would be less than significant, because the impacts can be addressed through standard site engineering practices.

4.3.13 Seiche and Tsunami Hazards

The Project site is not located adjacent to a closed or restricted body of water that could seiche. No impacts from seiche hazards would occur. Similarly, the Project is not mapped within a tsunami inundation zone, and no impacts from tsunami hazards would occur.

4.3.14 Landslide/Mudflow Hazard

The site is not located in a mapped landslide, within a hillside area, nor in a potential seismically induced landslide zone. Additionally, the Project does not include any excavations into a hillside. No impacts from landslide hazards would occur.

4.3.15 Expansive Soils Hazards

The expansion range of the soils on the Project site would be mitigated to less than significant by implementation of the Ventura County Building Code. Building foundations into future compacted fill would be designed for medium expansive soils conditions. Future development of the site is subject to the requirements of the County of Ventura Building Code that require mitigation of potential adverse effects of expansive soils. Hazards impacts associated with adverse effects of expansive soils would be less than significant.

4.3.16 Subsidence Hazard

The Project site is located within a probable subsidence hazard zone as delineated on the Ventura County General Plan Hazards Appendix. A subsidence hazard to an area may be caused by the removal of oil, gas, and/or water such that the overburden load that the liquid used to support is placed on the rock or sediment structure and this material becomes compressed producing a net loss in volume and a depression in the land surface. The proposed Project would not involve oil, gas, or groundwater extraction, the new buildings included in the Project are not within 100 feet of existing extraction facilities, and subsidence impacts would be less than significant.

4.3.17 Hydraulic Hazards

Non-FEMA

The Project would increase the impervious area on the site; however, no increase in flooding hazard or potential for erosion or siltation would occur, as the increase in runoff would be collected and detained in proposed stormwater impoundments. Impacts would be less than significant.

FEMA

The Project site is in Zone X, which is not a Federal Emergency Management Agency (FEMA) 1 percent annual chance (100-year) floodplain. However, the proposed retaining wall along the east side of the Project site would create a leveed condition and must be designed as a flood wall per the United States Army Corp of Engineers requirements. The Project is also required to submit final versions of the Regional & Local Hydrology Study and the Hydrologic and Hydraulic Report to the County prior to Project approval. The Project would result in a less than significant impact.

4.3.18 Fire Hazards

The Project site is not located within a High Fire Severity Zone. The proposed Project is required to comply with all applicable federal and California regulations and the requirements of the Ventura County Building Code and Ventura County Fire Code. The proposed Project is subject to conditions of approval to ensure the Project is in conformance with current California law and the Ventura County Fire Code. Therefore, fire hazard impacts would be less than significant.

4.3.19 Aviation Hazards

The proposed Project would not obstruct navigable airspace, as all reasonably foreseeable future development on the Project site would be limited to a maximum of 35 feet. Additionally, the site is not located within the Sphere of Influence of any County airport. The nearest County airport, Santa Paula, is 4.5 miles northeast of the Project site. The Project would be required to comply with the County's Airport Comprehensive Land Use Plan and pre-established deferral criteria set forth in the Federal Aviation Regulation Part 77 (Obstruction Standards). Therefore, no impact would occur.

4.3.20 Hazardous Materials/Waste

Materials

The Project would be a Commercial Organics Processing Operation that accepts feedstock with minimal household hazardous waste and other contaminants, which would be source-separated and inspected by the facility operator. The proposed Project would be a commercial use because it requires a CUP for expansion of a commercial business for sale of agricultural products, but both the existing and proposed use are also accessory to agricultural activities, because the finished product generated by the project (compost) is used for agriculture and because the Project provides a location for green material to be processed/composted without travelling far away from the point of generation. The existing operation maintains an active permit to operate from the County EHD as the Certified Unified Program Agency (CUPA). Incidental handling of the following hazardous materials is expected: diesel fuel, unleaded gasoline, motor oil, hydraulic oil, transmission oil, glycol-based coolant, acetylene, oxygen, and propane. A Hazardous Materials Business Plan (HMBP) for reportable hazardous materials was electronically submitted to the California Environmental Reporting System (CERS) on April 9, 2019 (CERS ID 10337200). The HMBP in CERS is required to be updated with the Project to comply with California law. Hazardous materials would be stored inside the proposed maintenance building in compliance with the applicable state and local regulations. Compliance with applicable state and local regulations would reduce potential Project-specific impacts to less than significant levels.

Waste

The existing operation maintains an active hazardous waste generator permit from the Ventura County EHD/Certified Unified Program Agency (FA0010148), and an active hazardous waste generator U.S. EPA ID number issued by the Department of Toxic Substances Control (CAL000297304). The proposed Project would generate hazardous waste in the form of waste oil from equipment and vehicle maintenance activities as well as other incidental waste materials. Compliance with applicable federal, state, and local regulations would reduce potential Project-specific and cumulative impacts to a less than significant level.

4.3.21 Noise and Vibration

The proposed Project would involve the construction of buildings and site improvements and the operation of land uses that would generate noise and vibration. Noise sensitive uses include, but are not limited to, dwellings, schools, hospitals, nursing homes, churches, and libraries. The proposed Project is located approximately 0.25 mile south of SR 126, outside the Community Noise Equivalent Level (CNEL) 60 A-weighted decibels (dBA) noise contour and 4.5 miles west of Santa Paula Airport; therefore, the site is not subject to excessive noise from these sources.

There are three primary nearby residential receptors: one located 650 feet southwest of the site, one 40 feet south of the site, and one 150 feet southeast of the site. Noise generated by Project operations would be below the noise thresholds for industrial source noise, with the maximum noise level with the Project of 51.9 dBA during the day (refer to the IS provided in Appendix A).

Construction noise, based on the grading phase, would exceed the Ventura County Construction Noise Threshold at two of the nearest residential receptors during the daytime. However, per the County's guidance document, "single-family and multi-family dwellings (residential)" are only considered "noise-sensitive locations" during the "evening/nighttime" periods (i.e., between 7:00 p.m. – 10:00 p.m. and 10:00 p.m. – 7:00 a.m., respectively). Therefore, as long as Project construction activities occur during daytime hours only, the Project's noise impacts at nearby receptors would be less than significant. In addition, the IS (included as Appendix A), provides mitigation measure NOISE MM-1, Construction Noise with Idling Restriction, which restricts construction hours and idling times. Impacts would be less than significant.

4.3.22 Daytime Glare

The Project site is in a rural area surrounded by lands in agricultural production and, to a lesser degree, very low density, rural residential development. The Project site is not noticeably visible from SR 126 but is visible from Edwards Ranch Road. The potential to create a new source of glare for motorists is low; however, the Project would likely incorporate lighting that could have a significant impact on wildlife movement in and around the SCR, if it is excessive or shines into adjacent areas with native vegetation. As described previously, mitigation measure BIO MM-4, Lighting Plan, requires the Applicant to submit a lighting plan to the Planning Division for review and approval. Additionally, as discussed previously, the Project Applicant would submit a materials sample/color board at the time of construction of the proposed commercial composting facility and utilize natural building materials and colors (earth tones and non-reflective paints) on exterior surfaces of all structures. Therefore, the Project-specific glare impact would be less than significant, and the proposed Project would not make a cumulatively considerable contribution to significant cumulative glare impacts.

4.3.23 Public Health

The Project site has been historically used for agricultural purposes and is currently used by the existing composting operation, which would be expanded by the proposed Project. Public health impacts commonly associated with commercial organics composting activities include, but are not limited to, odors, dust and bioaerosols, and vectors. The Project Applicant submitted a Vector Control Plan and Odor Impact Minimization Plan to analyze impacts related to these areas of concern. As described in these plans, the permittee (in this case the Applicant) would employ a program of best available control measures and BMPs related to vector and odor control to address and eliminate potential public health impacts.

The proposed Project has the potential to impact public health due to the use of multiple OWTS. The Project is required to adhere to state and local OWTS regulations and properly maintain of tanks and disposal fields. Septic tanks must be pumped by a Ventura County EHD-permitted pumper truck and septage wastes must be disposed of in an approved manner.

The proposed Project may have impacts to public health due to on-site storage and/or handling of hazardous materials and the generation of hazardous waste; however, the Project is required to comply with applicable hazardous materials and hazardous waste regulations, which would reduce potential Project impacts to a less-than-significant level. Additionally, mitigation measure WASTE MM-1, Composting Facility – Wet and Dry Organics Processing Design, Operation, and Maintenance (included in the IS, Appendix A), requires written maintenance and operations plans identifying BMPs and specific control technologies for the operation and maintenance of the facility.

4.3.24 Greenhouse Gases

Neither VCAPCD nor the County has adopted a threshold of significance applicable to GHG emissions from projects subject to the County's discretionary land use permitting authority. The County has, however, routinely applied a 10,000 metric tons carbon dioxide equivalent per year (MT CO_2e/year) threshold of significance to industrial projects, in accordance with CEQA Guidelines Section 15064.4(a)(2). VCAPCD has concurred with the County's approach.

The Project's GHG emissions would result in a net benefit because compostable material in western Ventura County that is currently disposed of at landfills would be diverted to the Project site for composting. Diverting organic waste material prevents methane (CH_4—a potent GHG) emissions from being generated in landfills. Composting 1 ton of yard trimmings can prevent the production of 0.2 MT CO_2e and composting 1 ton of food material can prevent the production of approximately 0.3 MT CO_2e (IS, Appendix A). There would also be a reduction in incremental GHG mobile emissions, because newer and cleaner emission off-road equipment is proposed for on-site use. The total incremental GHG emissions for the proposed Project are -59,640 MT CO_2e/year (based on Air Quality, Climate Change Impact and Health Risk Assessment prepared for the proposed Project), which is well below the 10,000 MT CO_2e/year recommended threshold of significance and results in a net GHG benefit.

4.3.25 Community Character

The Project site is zoned and designated for agricultural use and surrounded by agricultural production lands and very low density rural residential development. The Project site is currently developed with an existing composting facility, which uses heavy equipment operated on-site.

Large-scale commercial organics processing operations are currently permissible within the AE zone subject to a CUP. NCZO Section 8107-36.4.1 does not allow organics processing operations, other than those accessory to agricultural activities and on-site composting operations, in the AE zone on farmland designated as Prime, Statewide Importance, Unique, or Local Importance on the California Department of Conservation's Farmland Mapping and Monitoring Program, Important Farmlands Maps. The proposed Project would not comply with the NCZO Section 8107-36.4.1; however, the Project would include a Text Amendment to NCZO Section 8107-36.4.1 to allow a commercial organics processing operation on 70 acres. The Ventura County Board of Supervisors screened the privately-initiated zoning Text Amendment on September 15, 2015 and approved the proposed changes for further processing.

Additionally, the proposed Project would be conditioned to require the submittal of a material sample/color board, a landscape plan (under mitigation measure CULTURAL MM-2, Screening and Landscaping Plan) and a lighting plan (under mitigation measure BIO MM-4, Lighting Plan) for review and approval prior to issuance of a Zoning Clearance for the construction of the proposed Project. These requirements ensure the proposed facility is compatible with adjoining land uses. Additionally, the site access roads would not be expanded or otherwise displace off-site agricultural operations. Therefore, the Project would result in less than significant community character impacts.

4.3.26 Housing

The proposed Project would include the construction of a commercial organics composting facility on 70 acres and would not eliminate existing dwelling units. Construction worker demand from the Project would be short-term and served by a sufficient pool of construction workers within Ventura County and the Los Angeles metropolitan regions. No employees would reside on the Project site, and the existing composting operation employs 11 full-time employees. The proposed Project would increase the total number of full-time equivalent employees to 37, an increase of 26 employees, which is below the County's threshold for 30 new full-time employees. Therefore, the Project would not involve the displacement of existing residences or people or substantially increase the demand for construction worker or employee housing. Impacts would be less than significant.

4.3.27 Transportation & Circulation

Roads and Highways

Level of Service

The Project potentially could generate additional traffic on local public roads and the regional road network; however, the traffic generated by the Project would not have the potential to alter the Level of Service on nearby County-maintained roads. The Project site would be accessed from the north via Edwards Ranch Road and Telegraph Road. The site would not be accessed from Todd Road or Gaythorne Road east of the property. Public safety secondary access is proposed along a 24-foot wide, unnamed, all weather access road that would provide a second emergency connection to Telegraph Road, approximately 1,000 feet west of the intersection of Edwards Ranch Road and Telegraph Road as described below under *Tactical Access*.

The Project's traffic study concluded that the Project would not significantly impact study area roadway segments, would not significantly impact AM or PM peak hour intersection operations, would be required to pay Ventura County's Traffic Impact Mitigation Fee, would not result in

impacts based on the County's Congestion Management Plan (CMP) criteria, and would not exceed the CMP cumulative thresholds. Impacts would be less than significant.

Safety and Design of Public Roads

The traffic generated by the Project potentially could alter the safety of nearby County-maintained roads. The existing turning radius at the southwest and southeast corners of the intersection of Telegraph Road and Edwards Ranch Road are inadequate for large truck turning movements. As a result, roadway widening, and utility pole relocation are required for the Project. In addition, mitigation measure TRANSPORTATION MM-1, Road Improvements, would require road improvements at Telegraph Road and Edwards Ranch Road (refer to the IS, Appendix A).

The proposed street improvements would accommodate trucks and large vehicles for both westbound and eastbound traffic entering the Project site from Telegraph Road, mitigating the potential safety impacts from Project-generated traffic. Therefore, impacts related to safety/design of County roads would be less than significant.

Safety and Design of Private Access

Primary site access would occur via Edwards Ranch Road, a private road, which would connect the site to Telegraph Road. Secondary all-weather access, as required by Ventura County Fire Protection District (VCFPD), is proposed along an unnamed access road (described below under *Tactical Access*) which also connects to Telegraph Road and will supplement public safety access in the event of an emergency. This access is required to meet Fire District Standard 501. Therefore, impacts relating to access would be less than significant.

Tactical Access

Primary site access would occur via Edwards Ranch Road, a private road which connects the site to Telegraph Road, 3,600 feet north of the Project site entrance. VCFPD requires secondary all-weather access, which is proposed along a 24-foot wide, unnamed, all weather access road that would provide a second emergency connection to Telegraph Road, approximately 1,000 feet west of the intersection of Edwards Ranch Road and Telegraph Road. This access is required to meet Fire District Standard 501. Therefore, adverse impacts relating to access would be less than significant. Additionally, a standard condition of approval setting the maximum single access road length is applicable to the Project.

Pedestrian/Bicycle Facilities

There are no pedestrian and/or bicycle crossings on Edwards Ranch Road. Furthermore, the most appropriate County road standard for roadways in rural areas does not require pedestrian facilities (sidewalks) and/or bicycle facilities (bike lanes). The proposed Project would not generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities. The proposed Project would be located within a rural area removed from a concentration of pedestrian and bike routes as well as from schools, commercial centers, and transit facilities. Project impacts would be less than significant.

Bus Transit

The Project site is not located within proximity to any bus transit facilities or routes with which it could interfere. The nearest transit stop is 2 miles east of the Project site at a Ventura Intercity

Transit Authority transit stop located near the Briggs School. The Initial Study determined that the proposed Project would generate 770 average daily vehicle trips, with increased traffic associated with incoming compostable material, outgoing sales, and incoming deliveries, none of which would use the bus transit system. Section 4.2 of this EIR has determined that the proposed Project would generate a peak day increase of 2,896 VMT per day and that this increase in VMT is due to vehicle trips associated with the increase in incoming waste, increase in incoming deliveries, the additional compost being sold, and the Project's 26-employee net increase, none of which would have a significant impact on the bus system. Therefore, Project impacts would be less than significant.

Railroads

A 100-foot-wide Southern Pacific Railroad right-of-way abuts the Project site boundary to the north. At-grade railroad tracks are located along the northern boundary of the Project site, approximately 50 feet from the entrance of the facility. The existing Project site traffic utilizes an uncontrolled crossing to gain entrance to the facility. Crossing has been granted by a private license agreement between the Limoneira Company and the Ventura County Transportation Commission (VCTC)[4]. A new lease for project access will be required by VCTC.

The proposed driveway crosses the railroad tracks, creating a potential conflict between construction and operational vehicle traffic and future railroad operations. Additionally, the Project improvements would be constructed near these existing tracks; the administrative building would be setback approximately 75 feet from the tracks. However, the proposed Project would not create additional demand for railroad facilities or operations. Therefore, Project impacts would be less than significant.

Airports

The Project site is located 5.5 miles southwest from the Santa Paula Airport and is not within the Sphere of Influence of any County-operated airport. Proposed structures would not exceed the maximum height of 35 feet allowed by the Ventura County NCZO and would not involve the introduction of substantial lighting or other features that could interfere with air traffic safety. Therefore, Project impacts would be less than significant.

Harbor Facilities

The Project site is located 8.7 miles from the nearest harbor, Ventura Harbor, and the Project would not result in an increase in demand for commercial boat traffic. Therefore, Project impacts would be less than significant.

Pipelines

The County GIS Maps (2019) indicate that the proposed CUP boundary is near a major pipeline which is adjacent to the northern boundary of the project, but the proposed Project would not relocate or remove these existing improvements. Therefore, Project impacts would be less than significant.

[4] The Southern Pacific Railroad was incorrectly referred to as inactive in the IS and, in response to VCTC's comments during the NOP process, this error has been addressed and corrected in this EIR. While historically this easement existed in this location, the survey conducted for the Project indicates that the Private License Agreement is lost, and the exact location of the permitted crossings cannot be plotted. The Project Applicant is aware that there are active train operations along the railroad track and that further development of the property must be coordinated with VCTC and undertaken in accordance with all applicable regulations governing rail lines.

4.3.28 Water Supply

Quality

Domestic water supply for the proposed Project would be provided by the City of Santa Paula. The proposed Project would not result in Project-specific or cumulative impacts to the domestic water quality.

Quantity

Domestic and operational water for the proposed Project would be provided by the City of Santa Paula. The water supply pipeline serving the Project site would be upgraded as part of the Project; however, this modification would not induce growth in the vicinity of the Project, as the diameter increase of the pipe would only be sufficient to supply the Project's required water demand. Additionally, agricultural operations operated by the property owner (Limoneira Company) are predominately located adjacent to the proposed upgrade. Other parcels within the vicinity of the extension and upgraded water service lines are the County Todd Road Jail Facility and the Saticoy Foods Facility. The expansion of the services in the vicinity will not result in additional growth due to the existing ownership and development pattern within this area of Todd Road, therefore no cumulative impacts would occur as it relates to water supply quantity-related impacts. The proposed Project would not result in Project-specific or cumulative impacts to the domestic water supply.

The proposed operation would capture and store rainwater to supplement composting operational water needs. The net irrigation impact to the existing basin is approximately 127 acre-feet per year (AFY). With rainwater capture and storage, the proposed Project would result in a net reduction in groundwater use, estimated at 60 AFY less than the current orchard use in normal precipitation years, 76 AFY less in wet years, with a net increase of 2 AFY in dry years. The proposed Project would not directly or indirectly decrease, either individually or cumulatively, the net quantity of groundwater in a groundwater basin that is overdrafted or create an overdrafted groundwater basin. Groundwater quantity impacts would be less than significant.

Fire Flow Requirements

Water to the proposed Project would be supplied by the City of Santa Paula. The Project is required to provide an on-site water supply that meets the required fire flow in accordance with the Ventura County Fire Code. New fire hydrants and fire sprinklers within the proposed structures would be installed as part of the proposed Project, which would be required to meet VCFPD fire flow requirements. Therefore, impacts would be less than significant.

4.3.29 Waste Treatment & Disposal Facilities

Individual Sewage Disposal Systems

The proposed Project would utilize multiple OWTS, including multiple septic tanks, well pumps, and leach lines. The OWTS require a waste discharge permit from the Los Angeles Regional Water Quality Control Board, as well as conformance with the County Building Code Ordinance, California OWTS policy, EHD guidelines, and required routine maintenance of septic systems. Impacts would be less than significant.

Sewage Collection/Treatment Facilities

The proposed Project would utilize multiple OWTS and would not require connection to a sewage collection facility. The Project is located more than 2.5 miles from existing sewer lines which are within Santa Paula city limits. Therefore, impacts would be less than significant.

Solid Waste Management

Ventura County has at least 15 years of disposal capacity available (refer to the IS, Appendix A), and the Project would not generate substantial amounts of waste that would reduce this disposal capacity. Additionally, Ventura County Ordinance 4421 requires all discretionary permit project proponents whose proposed Project includes construction and/or demolition activities to reuse, salvage, recycle, or compost a minimum of 65 percent of the solid waste generated by their project. The Integrated Waste Management Agency's waste diversion program ensures this 65 percent diversion goal is met prior to issuance of a final zoning clearance for use inauguration or occupancy, consistent with the Ventura County General Plan's Waste Treatment and Disposal Facility Goals and Policies. Therefore, the proposed Project would result in a less than significant impact.

Solid Waste Facilities

The Project's estimated annual average tons per year of feedstock is 295,000 cubic yards and up to 153,000 cubic yards of materials stored on-site. These activities constitute a full solid waste facility permit to be issued by EHD Local Enforcement Agency and requires concurrence from CalRecycle. Composting facilities are required to comply with general design and operating standards per CCR Title 14, Section 17866 and 17867. The buildings must be designed and operated to prevent leachate leaving the site, minimize odors, and ensure employees are working in a safe and healthful workplace. The Project Applicant has prepared a Vector Control Plan, Odor Impact Minimization Plan, Dust Control Plan, and Containment Area for Compost Processing Operations Plan. These plans are expected to adequately address nuisance and public health issues or will be revised as needed to address operational issues as they arise. Compliance with federal, California, and local solid waste regulations, and mitigation measure WASTE MM-1, Composting Facility – Wet and Dry Organics Processing Design, Operation, and Maintenance (refer to the IS, Appendix A) would ensure impacts would be less than significant.

4.3.30 Utilities

The area in which the Project site is located is currently served with electrical, gas, and communication facilities. The proposed Project would utilize a propane tank; therefore, a natural gas service line connection would not be required. Accordingly, Project impacts would be less than significant.

4.3.31 Flood Control Facilities/Watercourses

Watershed Protection District

The Project site is located 0.25 mile north of the SCR, which is a Ventura County Watershed Protection District jurisdictional redline channel. No direct connections to the SCR are proposed. As discussed previously, the Project site is located outside the 100-year floodplain; however, off-site flows would be higher than 1 foot above the landside finished grade of the proposed retaining wall

along the east side of the development. This retaining wall must be designed as a flood wall to meet the guidelines for levee design as delineated by the United States Army Corp of Engineers.

Runoff from the Project site would be released at no greater than the undeveloped flow rate and in such manner as to not cause an adverse impact downstream in peak, velocity, or duration. The proposed Project design, with incorporation of the conditions for retaining wall design and pre-and post-development flow rate design parameters mentioned above, ensures that direct and indirect Project impacts would be less than significant.

Other Facilities

The Project would preserve the existing trend of runoff and local drainage patterns and is designed to capture and prevent any surface water runoff from the site that could impact neighboring properties. Stormwater runoff from working surfaces would be directed to water retention ponds proposed at the south boundary of the Project site. The site has been designed to contain runoff from a 25-year, 24-hour storm within water retention basins.

The Project would not create an obstruction of flow in the existing drainage as the Project would maintain the drainage conditions that presently exist. The Project would not impact the capacity of the downstream channel (SCR) or increase the potential for channel overflow during design storm conditions. There would be no adverse effects to Areas of Special Flood Hazard, regulatory channels, and natural and human-made channels. The proposed Project is required to be completed according to current codes and standards. Therefore, Project impacts would be less than significant.

4.3.32 Law Enforcement/Emergency Services

Proposed land uses are not identified in the Ventura County ISAGs as having the potential to increase demand for law enforcement or emergency services. The Project would maintain 24-hour security for the facility 365 days per year through perimeter fencing, locked gates, and nighttime lighting. The nearest Ventura County Sheriff's Station is the West County Police Services/Headquarters Station, located approximately 5.5 miles west of the Project site. The proposed Project would not substantially increase demand for law enforcement or emergency services and impacts would be less than significant.

4.3.33 Fire Protection Services

Distance and Response

The nearest fire station, Ventura County Fire Station 26, is located 5.5 miles northeast of the Project site. The proposed Project would not require the construction of a new fire station or additional personnel to serve the site. Therefore, the proposed Project would result in a less than significant impact.

Personnel, Equipment, and Facilities

As described above, the proposed Project would not result in the need for additional fire protection services personnel. Additionally, the VCFPD would require a standard condition that on-site water supply (three 120,000-gallon fire water storage tanks are proposed) and fire hydrants meeting the required fire flow be provided in accordance with the Ventura County Waterworks Manual and the Ventura County Fire Code. Therefore, the proposed Project would result in a less than significant impact.

4.3.34 Education

Schools

The Project would not interfere with the operations of an existing school facility or cause a significant demand on schools. The Project site is located approximately 1.9 miles southwest of the Briggs School, 2 miles south of Olivelands School, and 2.2 miles east of Saticoy Elementary School. California authorizes the collection of Developer Fees pursuant to Section 65996 of the California Government Code for commercial and industrial Projects. These fees fund the construction of new school facilities necessitated by the impact of residential and commercial development activity. Payment of such fees are based on the rationale that as commercial and industrial development occurs, so would the need for new or expanded school facilities due to new employment and potential resulting population increase within the geographic area of the Project. Therefore, the proposed Project would be required to pay school developer fees and impacts would be less than significant.

Public Libraries

The Project site is not located adjacent to a public library facility and would not interfere with the operations of an existing public library facility. The nearest public library, Saticoy Library, is located approximately 1.9 miles south of the Project site. The proposed use and development of the Project site would not result in the potential to increase the demand for library services. Therefore, the proposed Project would result in a less than significant impact.

4.3.35 Recreation Facilities

The Project would not include a residential component that would increase demand for recreation, parks, and/or trails and corridors in the local area and would not impede the future development of local parks facilities, and the Project site is not located adjacent to any of these facilities. As described in Section 4.2.27, *Transportation & Circulation*, Project traffic would use an uncontrolled rail crossing to enter the facility, and crossing has been granted by a private agreement between the Limoneira Company and VCTC; Project traffic would not affect operation of this railroad. A new lease for project access will be required by VCTC. As discussed in the Santa Paula Branch Line Recreational Trail Master Plan (July 1999), the existing railroad right-of-way is the future location of Santa Paula Branch Line Trail. Figure 83 of the Trail Master Plan depicts typical design for private road crossings which include the following improvements: signage and trail markings, warning lights and trail fencing, and crossing arms. The implementation of the Trail Master Plan will include the final design and construction of this typical crossing layout. With the implementation of the typical crossing design the trail would not be substantially affected by Project traffic. Therefore, the proposed Project would result in a less than significant impact.

4.3.36 Energy

The proposed Project would require the use of petroleum, electricity, and natural gas for construction and operation. Electricity would be provided by Southern California Edison (SCE) and natural gas would be provided by an on-site propane tank. According to the California Energy Commission (CEC), in 2019, the County of Ventura consumed approximately 5,344.0 gigawatt-hours (GWh) of electricity (CEC 2020a) and 186 million therms (17,300,000 million British thermal units [MMBtu]) of natural gas (CEC 2020b).

Project construction would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction activities would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of 13 CCR Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than 5 minutes to minimize unnecessary fuel consumption. Construction equipment would also be subject to the U.S. EPA Construction Equipment Fuel Efficiency Standard (40 Code of Federal Regulations Parts 1039, 1065, and 1068), which would minimize inefficient fuel consumption. Therefore, Project construction would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Project operation would consume approximately 2.0 GWh of electricity and 4,970 MMBtu of natural gas per year, which represents less than 0.04 percent of the 5,344 GWh from the County's annual electricity use and less than 0.03 percent of the 17,300,000 MMBtu from the County's annual natural gas use. The Project would comply with standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California Green Building Standards (as codified in CCR Title 24, Part 11) requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) require newly constructed buildings to meet energy efficiency performance standards set by the CEC. The standards are updated every 3 years, and each iteration increases energy efficiency standards. Furthermore, use of nonrenewable energy resources would decline over time as the electricity generated by renewable resources provided by SCE continues to increase to comply with California requirements through SB 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Based on the above, the Project would not result in wasteful or unnecessary energy consumption, and impacts would be less than significant.

5 Other CEQA Required Discussions

This section discusses growth-inducing impacts and irreversible environmental impacts that would be caused by the proposed Project.

5.1 Growth Inducement

Section 15126(d) of the CEQA Guidelines requires a discussion of a proposed Project's potential to foster economic or population growth, including ways in which a Project could remove an obstacle to growth. Growth itself does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed Project's growth-inducing potential is therefore considered significant if Project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

The proposed Project would not directly generate population growth, because it does not include residential uses. However, the Project may indirectly increase the local population if new employees relocate to the surrounding area. As discussed in Section 4.3, *Less Than Significant Environmental Effects*, "Population and Housing" of this EIR, and as outlined the Initial Study (Appendix A), the net increase of employees at the expanded Agromin-Limoneira facility is expected to be 26 employees. None of the employees would live on site but may potentially live in the County of Ventura. As determined by the Southern California Association of Governments (SCAG), the January 2020 population of Ventura County is 886,400 and the forecast population in 2040 is 965,400 (SCAG 2016), for an increase of 79,000 persons over the next 20 years. Ventura County currently has approximately 3.08 persons per household (U.S. Census Bureau 2020). As a result, the proposed Project would result in an estimated potential additional 81 residents (26 employees x 3.08 people per dwelling unit) if each new employee represented a new household in the County. The estimated potential 81 residents from the proposed Project represents less than 0.01 percent of the estimated population increase in the area through the year 2040. Due to the relatively small increase in population which may result from the proposed Project, this potential indirect increase in population would be accommodated within the unincorporated County of Ventura growth projections which were derived from the SCAG forecasts. Therefore, any population growth associated with the Project would not result in significant long-term physical environmental effects.

5.1.2 Economic Growth

The proposed Project would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, construction of the Project would not be growth-inducing from a temporary employment standpoint. While the proposed Project would also add long-term employment opportunities associated with operation of the facility, as stated above, the Project would not cause an exceedance in the regional growth forecasts.

The proposed Project would not be expected to induce substantial economic expansion to the extent that direct or indirect physical environmental effects would result.

5.1.3 Removal of Obstacles to Growth

The Project site is located in an area that is served by existing infrastructure. The City of Santa Paula would provide potable water to the proposed Project, as confirmed in a Will Serve letter, dated March 22, 2018, from the City (Attachment 7 of the Initial Study [Appendix A]). The Project site is located outside the City's service area; therefore, approval of an Out of Agency Service Agreement from the Ventura Local Agency Formation Commission (LAFCo) would be required; however, annexation would not be required. The Project would connect to the City's water lines via a new service connection from an existing City water line to the Ventura County Jail at Todd Road to the east. The new water line would serve as the primary water supply for the proposed Project.

The existing water line for current operations at the Project site is an 8-inch line connected to a Limoneira-owned water well located approximately 4,000 feet northeast of the Project site. This water line runs from the well to a 10,000-gallon water tank located at the north side of the existing operation. Other water lines run from there to other tanks on the site. The proposed water line would be 12 inches in diameter, run along the southeastern Project boundary on Roger Road, northwest along a private right-of-way, and then east along Gaythorne Road.

As shown in Figure 2-2 of this EIR, the proposed water line would be placed within existing rights-of-way such as driveways and dirt roads. The new water line would connect to the proposed utilities pad, located in the southeast area of the Project site. From there, it would run along the Project site's southeast boundary, just outside of the Project site but within the parcel on which the Project site is located, until it connected to the existing City water line to the Ventura County Jail at Todd Road to the east. The proposed water line would be 12 inches in diameter and would replace an existing water line within an alignment that exists within the Project parcel. The proposed line would be larger than the existing water line, which measures 8 inches in diameter but is designed to service the proposed Project and not accommodate additional growth in the area.[1] Please see Section 2, *Project Description,* for more detailed information pertaining to the water-line alignment.

The area in which the Project site is located is currently served with electrical, gas, and communication facilities. The Project site is currently served by existing electrical facilities provided by SCE. The proposed Project will utilize a propane tank; and, therefore, a natural gas service line connection would not be required. Wastewater disposal would be handled by a new On-site Wastewater Treatment System (OWTS). Much like water service outlined above, electrical, cable, and telephone infrastructure could be needed but would be sized to specifically serve the proposed Project.

The Project site would be accessed from the intersection of Telegraph Road and Olive Road (both public rights-of-way) south to Edwards Ranch Road (a private road) and crossing at the Southern Pacific Railroad right-of-way. As outlined in Section 4.3, *Less Than Significant Environmental Effects*, of this EIR and the Initial Study (Appendix A), the existing turning radius at the southwest and southeast corners of intersection at Telegraph Road and Edwards Ranch Road are inadequate for large truck turning movements. As a result, roadway widening and utility pole relocation are required for the Project. In addition, mitigation measure *TRANSPORTATION MM-1, Road Improvements*, requires road improvements at Telegraph Road and Edwards Ranch Road (refer to the Initial Study, Appendix A). These improvements are required to access a private road and would

[1] Information surrounding the proposed new water line was not available at the time of the Initial Study and thus not included in previous reports. However, because the water line would be built in previously disturbed areas and is being upsized to serve only the proposed Project, the improvement would not result in additional impacts beyond those examined in the Initial Study and has therefore been analyzed in this EIR, not through revisions to the Initial Study.

specifically serve the proposed Project. Further, the Project's traffic study concluded that the Project would not significantly impact study area roadway segments, would not significantly impact AM or PM peak hour intersection operations, would be required to pay Ventura County's Traffic Impact Mitigation Fee, would not have impacts based on the County's Congestion Management Plan (CMP) criteria, and would not exceed the CMP cumulative thresholds.

Because the Project constitutes redevelopment within a developed area and any extension of new infrastructure would be sized to specifically serve the proposed Project, Project implementation would not remove an obstacle to growth resulting in significant impacts.

5.2 Irreversible Environmental Effects

The CEQA Guidelines require that EIRs contain a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed Project.

The proposed Project would include further development on an already partially developed site in unincorporated Ventura County. Construction and operation of the Project would involve an irreversible commitment of construction materials and non-renewable energy resources. For example, the Project would involve the use of building materials and energy, some of which are non-renewable resources, to construct six buildings with an overall building floor area of 230,779 square feet. Consumption of these resources would occur with any development in the region and are not unique to the proposed Project.

The proposed Project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products and natural gas. However, increasingly efficient building design would offset this demand to some degree by reducing energy demands of the Project. As discussed in 4.3, *Less Than Significant Environmental Effects*, under "Energy," of this EIR and as outlined in the Initial Study (Appendix A), the Project would comply with applicable energy conservation requirements. Specifically, the Project would comply with standards set in California Building Code (CBC) Title 24, California Green Building Standards Code (as codified in California Code of Regulations Title 24, Part 11) for energy-efficient light fixtures and building materials, and 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requirements for newly constructed buildings to meet energy efficiency performance standards set by the California Energy Commission. Furthermore, use of nonrenewable energy resources would decline over time as the electricity generated by renewable resources provided by SCE continues to increase to comply with California requirements through SB 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. Consequently, the Project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and slowly renewable resources would be less than significant. Again, consumption of these resources would occur with any development in the region and is not unique to the proposed Project.

Additional vehicle trips associated with the proposed Project would incrementally increase local traffic and regional air pollutant and GHG emissions. However, as discussed in Section 4.3, *Less Than Significant Environmental Effects*, "Air Quality" and "Greenhouse Gas Emissions" of this EIR and as outlined in the Initial Study, development and operation of the Project would not generate air quality or GHG emissions that would result in a significant impact.

The Project would also require a commitment of law enforcement, fire protection, water supply, and solid waste disposal services. However, as discussed in Section 4.3, *Less Than Significant Environmental Effects*, "Public Services" and "Utilities and Service Systems" of this EIR and as outlined in the Initial Study (Appendix A), impacts to these service systems would not be significant.

CEQA requires decision-makers to balance the benefits of a proposed Project against its unavoidable environmental risks in determining whether to approve a Project. The analysis contained in this EIR concludes that the proposed Project would result in a significant and unavoidable impact to agricultural soils and VMT, as discussed in Section 4.1, *Agricultural Resources – Soils* and Section 4.2, *Transportation & Circulation - VMT* of this EIR, impacts would remain significant and unavoidable due to the irreversible loss of agricultural soils and increase in VMT from project operation. However, as stated in the Project objectives of the Initial Study, the Project would provide substantial public benefits as it would:

- Provide local and regional agricultural and nursery customers with high-quality composted products
- Assist in meeting California's GHG reduction goals of AB 32, AB 1826. Although GHG emissions are created by the composting process, these are outweighed by the avoided uncontrolled GHG emissions associated with landfills[2].
- Assist in meeting the landfill diversion goals in AB 939, AB 341, SB 1383 as well as meeting the SB 1383 procurement requirements for jurisdictions (e.g., County) as found in California Code of Regulations (CCR) 14 Section 18993.1 (adopted July 2020)
- Produce carbon negative fuel: The AB 32 Low Carbon Fuel Standard calls for a 10 percent reduction of the state's fuel intensity by 2020. The renewable Compressed Natural Gas (CNG) to be produced by the Project's dry AD Facility will assist California in meeting that goal. Biomethane generated from the AD of food material and green material has been determined by the California Air Resources Board (CARB) to be carbon negative
- Facilitate waste diversion and landfill space conservation through green material and food material composting
- Provide a convenient, environmentally compliant and cost-effective facility for the recycling of food material, green material, and other organic materials
- Promote public awareness of the benefits of recycling organics through public outreach programs
- Stimulate employment opportunities in the County of Ventura by adding additional employees at the site, and through the operator's on-going efforts, increase the use of organic products by farmers, landscape companies, golf courses, parks department, and other similar users of such products

[2] According to the U.S. Environmental Protection Agency's Landfill Methane Outreach Program landfill gas is comprised of roughly 50 percent carbon dioxide and 50 percent methane. Whereas a compost pile decomposes aerobically – with oxygen – producing mainly carbon dioxide. Methane is a potent GHG, 28 to 36 times more effective than carbon dioxide at trapping heat in the atmosphere over a 100-year period and therefore is more devastating to the climate. Please see the following link for more information: https://www.epa.gov/lmop/basic-information-about-landfill-gas#:~:text=LFG%20is%20extracted%20from%20landfills,in%20an%20LFG%20energy%20project.

6 Alternatives

6.1 Introduction

In accordance with CEQA Guidelines Section 15126.6, this section contains a comparative impact assessment of alternatives to the proposed Project. The primary purpose of an alternatives analysis under CEQA is to provide decision-makers and the public with a reasonable range of feasible alternatives to the proposed Project that could attain most of the basic project objectives, while avoiding or reducing any of the Project's significant adverse environmental effects.

Analysis of three alternatives to the proposed Project is provided for informational purposes and to allow decision-makers to consider the project in light of hypothetical alternative development scenarios, thereby promoting CEQA's purpose as an information disclosure statute. This analysis is guided by the following considerations set forth under CEQA Guidelines Section 15126.6:

- An EIR need not consider every conceivable alternative to a project
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process
- Reasons for rejecting an alternative include:
  - Failure to meet most of the basic project objectives
  - Infeasibility
  - Inability to avoid significant environmental effects

6.2 Potentially Significant Impacts

The Project was analyzed for potentially significant impacts related to each of the environmental issues discussed in the Initial Study (IS; see EIR Appendix A). Topics concluded to be potentially significant in the IS are further analyzed in this EIR. Topics determined in the IS to be scoped out of the EIR are summarized in Section 4.3, *Less-than-significant Environmental Effects*. The results of the EIR analysis indicate that the proposed Project would result in the following significant and unavoidable impacts. Mitigation measures are either not available or would not be successful for the following topics to reduce the respective significant impacts to a less-than-significant level:

- Agricultural Resources – Soils, specifically related to loss of Important or Prime Farmland (significant and unavoidable impact level – mitigation would not reduce to a less-than-significant level)
- Transportation & Circulation – Vehicle Miles Traveled (VMT), specifically related to increase in VMT (significant and unavoidable impact level – mitigation would not reduce to a less-than-significant level)

6.3 Project Objectives

As discussed in Section 2, *Project Description*, the objectives for the proposed Project are to:

- Produce and provide local and regional agricultural and nursery customers with high-quality composted products

- Assist in meeting California's GHG reduction goals of AB 32 and AB 1826. Although GHG emissions are created by the composting process, these are outweighed by the avoided uncontrolled GHG emissions associated with landfills.
- Assist in meeting the landfill diversion goals in AB 939, AB 341, SB 1383, as well as meeting the SB 1383 procurement requirements for jurisdictions (e.g., County) as found in CCR 14 §18993.1 (adopted July 2020)
- Produce Carbon Negative Fuel: The AB 32 Low Carbon Fuel Standard calls for a 10 percent reduction of the fuel intensity by 2020. The renewable compressed natural gas (CNG) to be produced by the proposed Project's dry AD facility would assist California in meeting that goal. Biomethane generated from the anaerobic digestion of food material and green material has been determined by CARB to be carbon negative
- Facilitate waste diversion and landfill space conservation through green/food material composting
- Provide a convenient, environmentally compliant and cost-effective facility for the recycling of food material, green material, and other organic materials
- Promote public awareness of the benefits of recycling organics through public outreach programs
- Stimulate employment opportunities in the County by adding additional employees at the site, and through the operator's ongoing efforts, increase the use of organic products by farmers, landscape companies, golf courses, parks department, and other similar users of such products

6.4 Alternatives to the Proposed Project

Included in this analysis are three alternatives, including the CEQA-required "no project" alternative that involves changes to the Project that may reduce the Project-related environmental impacts as identified in this EIR. Alternatives have been developed to provide a reasonable range of options to consider that would help decision-makers and the public understand the general implications of revising or eliminating certain components of the proposed Project.

The following alternatives are evaluated in this EIR:

- **Alternative 1 (No Project):** Under the No Project Alternative, the proposed Project would not be constructed. Rather, the existing site would remain operational for composting purposes, but no expansion or change in existing operations would occur. In addition, the adjacent 55 acres of citrus orchards would remain operational. No roadway, landscaping, utility, or vehicle parking improvements would occur.
- **Alternative 2 (Alternate Technology Mix):** Under the Alternate Technology Mix Alternative, the same amount of feedstock waste and other organic materials (i.e., food and landscape waste) would be brought to the Project site for processing as under the proposed Project, but a different composting technology mix for processing the organic material brought to the Project site would be utilized as follows: 25 percent open air windrow (OAW),[1] 60 percent covered aerated static pile (CASP), and 15 percent AD, rather than the composting technology mix included in the proposed Project of 60 percent OAW, 25 percent CASP, and 15 percent AD. While this alternative may produce a small decrease in total acres of composting facility and acres of farmland removed from production because CASPs generally require less land area than

[1] OAW uses naturally occurring microbes that feed on organic material (i.e., feedstock waste) and require oxygen. By feeding on organic material, the microbes break down the material and turn it into compost.

OAWs (US EPA, 2021), the areas that would be occupied by CASPs and OAWs are not considered to be permanently removed from agricultural production[2] since these composting devices could be removed and the underlying farmlands could be repurposed. Additionally, because of operational and space constraints that are necessary around either a CASP, OAW or combination of both systems, any decrease in total acres of composting facility and acres of farmland removed from production would be minimal. This analysis therefore assumes a <1-acre reduction in the total acres of composting facility and acres of farmland removed from production compared to the proposed Project, but no reduction in acres of permanent prime farmland conversion compared to the proposed Project. This different mix of technology would therefore consist of 69+ acres of composting facility area, 54+ acres of which would be new. As such, 54+ acres of citrus orchards adjacent to the existing 15-acre facility would be converted from Prime Farmland use to composting facility use rather than the 55 acres of existing citrus orchard that would be converted under the proposed Project, but only 34.26 acres of this conversion is considered permanent. Roadway, landscaping, and utility improvements would occur that would be similar in scope and location to those of the proposed Project, and vehicle parking improvements would be the same because there would be no reduction in employees compared to the proposed Project.

- **Alternative 3 (Reduced Intensity):** Under the Reduced Intensity Alternative, the amount of feedstock waste and other organic materials (i.e., food and landscape waste) brought to the Project site would be reduced by 20 percent. This different composting intensity at the Project site would consist of 56 acres of composting facility area (41 acres of which would be new). As such, 41 acres of citrus orchards adjacent to the existing 15-acre facility would be converted from Prime Farmland use to composting facility use, although only 29 acres of this conversion is considered permanent. Roadway, landscaping, and utility improvements would occur that would be similar in scope and location to those of the proposed Project. Vehicle parking improvements would be reduced by 20 percent to reflect a 20 percent reduction in employees compared to the proposed Project.

Table 6-1 provides a summary comparison of the development characteristics of the proposed Project and each of the alternatives considered. Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.5 through 6.7.

[2] Under the proposed Project, 55 acres of the Project site would be converted from citrus orchards to the uses included in the proposed Project. While the proposed Project would remove approximately 55 acres of Prime Farmland from production, only 34.26 of these acres would be converted from agricultural production to paved areas and proposed buildings. The proposed use of approximately 21 acres of the Project site for landscaping, retention basins, and native soil areas (including areas covered by composting piles) would remove these areas from agricultural production but would not necessarily result in permanent conversion of agricultural land, and therefore only 34.26 acres of permanent farmland removal/conversion would occur, as further discussed in Section 4.1, *Agricultural Resources* of this EIR.

Table 6-1 Comparison of Project Alternatives' Buildout Characteristics

Feature	Proposed Project	Alternative 1 (No Project)	Alternative 2 (Alternate Technology Mix)	Alternative 3 (Reduced Intensity)
Building Gross Square Feet	237,273	130	237,273	184,623
Acres of Composting Facility	70 (55 of which would be new)	15	69+ (54+ of which would be new)	56 (41 of which would be new)
Acres of Farmland Removed from Production	55	0	54+	41
Acres of Permanent Prime Farmland Conversion	34.26	0	34.26	29
Tons Processed per Year	295,000 tons per year (average of 808 tons per day)	60,000 tons per year (average of 164 tons per day)	295,000 tons per year (average of 808 tons per day)	236,000 tons per year (average of 647 tons per day)
Residential Units	0	0	0	0
Employees	37 (26 of which are new)	11	37 (26 of which are new)	30 (19 of which are new)
Maximum Building Height	Up to 35 feet	12 feet	Up to 35 feet	Up to 35 feet
Sustainability & Energy Efficiency Level	2019 CalGreen Building Code & Title 24, Pt 6	N/A	2019 CalGreen Building Code & Title 24, Pt 6	2019 CalGreen Building Code & Title 24, Pt 6

6.5 Alternative 1 (No Project)

6.5.1 Description

CEQA Guidelines Section 15126.6(e) require EIRs to evaluate a "No Project Alternative," which is defined as the "circumstance under which the project does not proceed." Under Alternative 1 (No Project), the proposed Project would not be constructed, and the existing site would remain operational for composting purposes. In addition, the adjacent 55 acres of citrus orchards would remain operational. No roadway, landscaping, utility, or vehicle parking improvements would occur.

6.5.2 Impact Analysis

a. Agricultural Resources – Soils

Under the No Project Alternative, the Project site would not be expanded, the on-site composting uses would remain operational, and roadways/landscaping/utilities would remain the same. The expanded composting facility and associated off-site water utility line improvements would not be constructed and operated on the project site, nor would the various landscape and roadway improvements occur. Since there would not be any acreage loss of existing citrus orchard within Prime Farmland, there would be no agricultural resources/soils impact under this alternative.

The proposed Project would result in significant and unavoidable impacts related to agricultural resources/soils (see Section 4.1, *Agricultural Resources – Soils*). The No Project Alternative would result in no impacts related to agricultural resources/soils. However, this alternative would not meet the Project objectives of providing expanded composting facilities, working towards California GHG emissions reduction goals related to solid waste emissions, or working toward California landfill-diversion goals.

b. Transportation & Circulation – VMT

Under the No Project Alternative, the Project site would not be redeveloped, the existing on-site uses would not be removed, and roadways would remain the same. The No Project Alternative would not result in additional vehicle trips, and the transportation system would be the same as identified under existing conditions. None of the transportation-related impacts of the proposed Project would occur and none of the mitigation measures that apply to the proposed Project would be implemented. Existing conditions would remain as they are currently, and the No Project Alternative would not generate any additional vehicle traffic or VMT compared to the current level of existing Project site trips or VMT. Thus, there would be a less than significant impact related to transportation under the No Project Alternative.

The proposed Project's transportation impacts (specifically those related to VMT) would be significant and unavoidable (see Section 4.2, *Transportation & Circulation – VMT*). The proposed Project would generate more daily vehicle trips and VMT than this alternative. The No Project alternative would not provide roadway and utility improvements that would occur under the proposed Project. Transportation impacts from the No Project Alternative would be less than those of the proposed Project. However, this alternative would not meet the Project objectives related to composting facilities in terms of transportation, since this alternative would not expand a composting facility in a convenient, centralized location within the County along a key transportation corridor thereby reducing out-of-County composting trips.

6.6 Alternative 2 (Alternate Technology Mix)

6.6.1 Description

Under the Alternate Technology Mix Alternative, the same amount of feedstock waste and other organic materials (i.e., food and landscape waste) would be brought to the Project site for processing as under the proposed Project, but a different composting technology mix for processing the organic material would be utilized as follows: 25 percent OAW, 60 percent CASP, and 15 percent AD, rather than the composting technology mix included in the proposed Project of 60 percent OAW, 25 percent CASP, and 15 percent AD. Using CASP technology allows construction of larger piles that require less land area than using OAW technology (US EPA, 2021); however, because of operational and space constraints that are necessary around either a CASP, OAW or combination of both systems, any decrease in total acres of composting facility and acres of farmland removed from production would be minimal. This alternative therefore assumes a less than one acre reduction in composting facility area compared to the proposed Project, resulting in 69+ acres of composting facility area (54+ acres of which would be new). As such, 54+ acres of citrus orchards adjacent to the existing 15-acre facility would be converted from Prime Farmland use to composting facility use rather than the 55 acres of existing citrus orchard that would be converted under the proposed Project.

Under the proposed Project, the proposed use of approximately 21 acres of the Project site for landscaping, retention basins, and native soil areas (including areas covered by composting piles) would remove these areas from agricultural production but would not necessarily result in permanent conversion of agricultural land since these composting devices could be removed and the underlying farmlands could be repurposed, and therefore only 34.26 acres of direct loss of Prime Farmland would occur, equaling 62 percent of the 55 acres of existing citrus orchard that would be removed. Because any space savings achieved by use of CASPs rather than OAWs would not necessarily result in permanent conversion of agricultural land, the Alternate Technology Mix Alternative assumes that the same amount of orchard removed would result in permanent conversion of Prime farmland as under the proposed Project. Using this assumption, 34.26 acres of Prime farmland would be permanently converted under this alternative. Roadway, landscaping, and utility improvements would be similar in scope and location to those of the proposed Project, and vehicle parking improvements would be the same because there would be no reduction in employees compared to the proposed Project.

6.6.2 Impact Analysis

a. Agricultural Resources – Soils

Under the Alternate Technology Mix Alternative, the existing on-site composting facility and operations would be expanded. However, a different composting technology mix for processing the organic material brought to the Project site would be utilized. The increase in CASP and decrease in OAW would require less land area for composting operations, but because of operational and space constraints that are necessary around either a CASP, OAW or combination of both systems, any decrease in total acres of composting facility and acres of farmland removed from production would be minimal. Thus, this alternative would expand the 15-acre facility to a 69+ acre facility, rather than a 70-acre facility as under the proposed Project.

Overall, this alternative would result in conversion (i.e., direct loss) of approximately 54+ acres of orchard and row crops that are considered Prime Farmland rather than the 55 acres of existing citrus orchard that would be converted under the proposed Project, with 34.26 acres of these 54+ acres being permanently converted. This would exceed the 5-acre significance threshold for impacts to Prime Farmland (from Table 4.2-1). Thus, there would be a significant and unavoidable agricultural resources/soils impact under this alternative. While implementation of Mitigation Measures AG-1 (establishment of an agricultural conservation easement) would reduce impacts to Important Farmland to the extent feasible within the County as a whole, it would not prevent the loss of existing Important Farmland caused by permanent conversion of 34.26 acres of the Project site from agricultural production to an agricultural accessory use.

The proposed Project impacts related to agricultural resources (soils) would be significant and unavoidable (see Section 4.1, *Agricultural Resources – Soils*). Although The Alternate Technology Mix Alternative may lead to a small (less than one acre) reduction in the amount of potentially temporary farmland conversion, it would permanently convert the same amount of Prime Farmland as the proposed Project. This alternative's impact on agricultural resources/soils would remain significant and unavoidable because it would exceed the 5-acre significance threshold for impacts to Prime Farmland. This alternative would not reduce the amount of Prime Farmland conversion compared to the proposed Project, but it would meet the Project objectives of providing expanded composting facilities, working towards California GHG emissions reduction goals related to solid waste emissions, and working toward California landfill-diversion goals. There are no specific agricultural resources/soils Project objectives.

b. Transportation & Circulation – VMT

Under the Alternate Technology Mix Alternative, the existing on-site composting facility and operations would be expanded. However, a different composting technology mix for processing the organic material brought to the Project site would be utilized. The increase in CASP and decrease in OAW is related to processing technology and would not affect the number of vehicle trips or VMT to deliver organic waste to the facility or affect the number of outgoing vehicle trips or VMT. Like the proposed Project, this alternative would result in approximately 2,392,308 annual VMT, or approximately 10,577 peak day VMT, with increased on-site processing and composting of green and food material compared to existing conditions (60,000 tons per year to approximately 295,000 tons per year). As such, this alternative would generate the same increase in VMT as the proposed Project: 594,182 VMT per year and a peak day increase of 2,896 VMT per day. Accordingly, like the proposed Project, this alternative would increase VMT from incoming waste and incoming deliveries.

In addition, since both this alternative and the proposed Project would increase the amount of compost produced and sold on the Project site, there would be a net increase in outgoing sales, although the average trip distance would likely decrease since those purchasing compost at wholesale would have the option of no longer having to travel to the Oxnard-Shoreline facility (resulting in a net decrease of 6 miles average roundtrip distance). Lastly, this alternative would not result in any reduction in the additional 26 employees required under proposed project (37 employees needed minus 11 employees at the existing facility), resulting in the same VMT increase as proposed Project. While both this alternative and the proposed Project would divert vehicle trips to the Gold Coast Materials Recycling Facility and Toland Road Landfill and result in shorter trip lengths for people purchasing compost, both would lead to increased VMT, largely due to the increase in incoming material, the additional compost being sold at wholesale, and the increase in

employees. Under either scenario, this increase would exceed the "no net increase" VMT threshold for impacts related to transportation. Thus, there would be a significant and unavoidable VMT impact under this alternative. There are no feasible mitigation measures available to reduce this impact to a less than significant level.

The proposed Project impacts related to transportation would be significant and unavoidable (see Section 4.2, *Transportation & Circulation – VMT*). The Alternate Technology Mix Alternative would result in approximately the same VMT for facility operation as the proposed Project; and, under this alternative, these impacts would remain significant and unavoidable, because they would exceed the "no net increase" threshold for VMT even with implementation of feasible mitigation measures. This alternative would meet Project objectives related to composting facilities, as this alternative would expand a composting facility in a convenient, centralized location within the County along a key transportation corridor, thereby reducing out-of-County composting trips .

6.7 Alternative 3 (Reduced Intensity)

6.7.1 Description

Under the Reduced Intensity Alternative, the amount of feedstock waste and other organic materials (i.e., food and green material) brought to the Project site would be reduced by 20 percent. This different composting intensity at the Project site would consist of 56 acres of composting facility area (41 acres of which would be new). As such, 41 acres of citrus orchards adjacent to the existing 15-acre facility would be converted from Prime Farmland use to composting facility use rather than the 55 acres of existing citrus orchard that would be converted under the proposed Project. The Reduced Intensity Alternative assumes that the same percentage of orchard removed would result in permanent conversion of Prime farmland as under the proposed Project: 70 percent. Using this assumption, only 29 acres of the 41 acres of Prime farmland that would be converted under this alternative are considered permanently converted.

Roadway, landscaping, and utility improvements that would occur would be similar in scope and location to those of the proposed Project. Vehicle parking improvements would be reduced by 20 percent to reflect a 20 percent reduction in employees compared to the proposed Project.

6.7.2 Impact Analysis

a. Agricultural Resources – Soils

Under the Reduced Intensity Alternative, the existing on-site composting facility and operations would be expanded. However, approximately 20 percent less organic material would be brought to the Project site. The decrease in processing intensity would require less land area and employees for composting operations, and, thus, this alternative would expand the 15-acre facility to a 56-acre facility (rather than to a 70-acre facility as under the proposed Project).

Overall, this alternative would result in conversion (i.e., direct loss) of approximately 41 acres of orchard and row crops that are considered Prime Farmland rather than the 55 acres of existing citrus orchard that would be converted under the proposed Project, with 29 acres of these 41 acres being permanently converted. This would exceed the 5-acre significance threshold for impacts to Prime Farmland (from Table 4.2-1). Thus, there would be a significant and unavoidable agricultural resources/soils impact under this alternative. While implementation of Mitigation Measures AG-1 (establishment of an agricultural conservation easement) would reduce impacts to Important

Farmland to the extent feasible within the County as a whole, it would not prevent the loss of existing Important Farmland caused by the permanent conversion of 29 acres of the project site from agricultural production to an agricultural accessory use.

The proposed Project's impacts related to agricultural resources (soils) would be significant and unavoidable (see Section 43.1, *Agricultural Resources – Soils*). The Reduced Intensity Alternative would permanently convert approximately 9 fewer acres of Prime Farmland than the proposed Project; however, this alternative's impact on agricultural resources/soils would remain significant and unavoidable, because it would exceed the 5-acre significance threshold for impacts to Prime Farmland. This alternative would meet Project objectives related to provision of expanded composting facilities, working towards California GHG emissions reduction goals related to solid waste emissions and working toward California landfill diversion goals. There are no specific agricultural resources/soils Project objectives.

b. Transportation & Circulation – VMT

Under the Reduced Intensity Alternative, the existing on-site composting facility and operations would be expanded. However, approximately 20 percent less processing of organic material brought to the Project site would occur. This reduction in processing of material at the facility would lower the number of vehicle trips and VMT required to deliver organic waste to the facility compared to the proposed Project. This alternative would therefore result in less annual VMT and peak day VMT compared to the proposed Project, with 20 percent decreased on-site processing and composting of green and food waste. Compared to the proposed Project, the VMT from incoming material and incoming deliveries also would decrease. Assuming a 20 percent reduction in VMT proportional to the 20 percent decrease in on-site processing and composting of green and food waste compared to the proposed Project, this alternative would generate 118,836 fewer VMT per year than the proposed Project and 579 fewer peak day VMT than the proposed Project, resulting in an increase of 475,346 VMT per year and 2,317 peak day VMT; whereas the proposed Project would generate an increase of 594,182 VMT per year and a peak day increase of 2,896 VMT per day.

In addition, since there would be a decrease in compost produced and sold at the Project site compared to the proposed Project, there would also be a net decrease in outgoing sales, although the average trip distance for those travelling to the facility would still likely decrease compared to existing conditions, since some of those purchasing compost at wholesale would have the option of no longer having to travel to the Oxnard-Shoreline facility (resulting in a net decrease of 6 miles average roundtrip distance for some deliveries compared to existing conditions). Lastly, this alternative would require an additional 19 employees (24 employees needed minus 11 employees at the existing facility), which also would result in an increase in VMT but would be less than the 26 employees (37 employees needed minus 11 employees at the existing facility) under the proposed Project. While diverting vehicle trips from the Gold Coast Materials Recycling Facility and Toland Road Landfill to the Project site would result in shorter trip lengths for people purchasing compost compared to existing conditions, this alternative would increase VMT compared to existing conditions, largely due to the increase in incoming material, the additional compost being sold at wholesale, and the increase in employees. This would exceed the "no net increase" VMT threshold. Thus, there would be a significant and unavoidable transportation impact under this alternative. There are no feasible mitigation measures available to reduce this impact to a less-than-significant level.

The proposed Project impacts related to transportation would be significant and unavoidable (see Section 4.2, *Transportation & Circulation – VMT*). The Reduced Intensity Alternative would result in

fewer VMT from a 20 percent reduced facility operation than the proposed Project; however, this impact would remain significant and unavoidable due to an increase in VMT even with implementation of feasible mitigation measures, although a smaller increase in VMT than under the proposed Project. This alternative would meet Project objectives related to composting facilities in terms of transportation, as this alternative would expand a composting facility in a convenient, centralized location within the County along a key transportation corridor, thereby reducing out-of-County composting trips.

6.8 Alternatives Considered but Rejected

Section 15126.6 of the CEQA Guidelines states that:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.
>
> The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

The California Supreme Court, in *Citizens of Goleta Valley v. Board of Supervisors* (1990), indicated that a discussion of alternative sites is needed if a project "may be feasibly accomplished in a successful manner considering the economic, environmental, social, and technological factors involved" at another site. Several criteria form the basis of whether alternative sites need to be considered in detail. These criteria take the form of the following questions:

1. Could the size and other characteristics of another site physically accommodate the project?
2. Is another site reasonably available for acquisition?
3. Is the timing of carrying out development on an alternative site reasonable for the applicant?
4. Is the project economically feasible on another site?
5. What are the land use designation(s) of alternative sites?
6. Does the lead agency have jurisdiction over alternative sites? and
7. Are there any social, technological, or other factors which may make the consideration of alternative sites infeasible?

Site characteristics that could support a project that meets the Project objectives include appropriate size to accommodate an economically viable expanded composting facility project, availability of appropriate utilities, and central location in Ventura County. To accommodate the needed composting services, the expanding composting facility must be located on a property or properties that is zoned appropriately, lacks steep slopes, is not located on Prime Farmland, lacks sensitive habitat and receptors, and measures approximately 70 acres or larger.

The following alternative sites were initially considered. However, for reasons discussed below, they were dismissed from further consideration.

6.8.1 Alternative Site Alternative

The purpose of considering an alternative location was to determine if another site in the County could provide the same level of service but would be located in an area that might reduce potentially significant impacts. The consideration of alternative sites involved a variety of factors, including, but not necessarily limited to, available land area, proximity to source materials and compost market, land use compatibility, land suitability (i.e., flat land, away from sensitive receptors, and within a reasonable shipping distance of Agromin's customers), access, and the ability to meet the objectives of the proposed Project.

An inventory conducted by Agromin concluded that there are very limited opportunities to locate commercial organics processing operations on suitable land that is not already under a Williamson Act Contract or on land that is not designated as Prime Farmland.

Open Space zoning designations are typically located on parcels with much higher slope percentages, higher concentrations of sensitive resources (e.g., rivers/streams), and higher concentrations of natural habitat. As a result, development on land zoned open space would require a large amount of grading, slope stabilization, and removal of natural and/or sensitive habitat. Another constraint is the fact that the County's Open Space zones are typically located outside of Ventura County's valley floors. Thus, locating composting facilities on these outlying parcels would significantly increase the travel distances required to bring product to the agricultural customer. The extra shipping distance would increase the cost of product delivery, which could disincentivize compost use in agriculture. Most of the other non-prime agricultural land within the County contains steeper slopes and/or sensitive natural resources such as drainages, streams, and rivers that make such sites unsuitable for a composting facility.

In addition, current County zoning does not provide adequate, reasonably located land for commercial composting facilities, especially medium- and large-scale facilities. According to an analysis of properties in unincorporated Ventura County with industrial (M-2/M-3) zoning conducted in April 2021, the only vacant M2/M3 zoning is located in the Ojai-Ventura-Santa Paula areas of the unincorporated area of the county. The total area of vacant parcels zoned M2 and M3 is 365.085 acres made up of 81 parcels ranging in size from 31.74 acres to 0.04 acres. The only properties with development potential (contiguous properties possessing a total area close to 70 acres) are along Ventura Avenue, but these appear to be eliminated from meeting the Project objectives due to proximity to residential development/developed suburban areas. These properties may also be subject to Ventura County General Plan Policy Prohibitions related to degradation of Level of Service and traffic safety. Specifically, these sites fail to provide a convenient, environmentally compliant, and cost-effective site for a facility for the recycling of food material, green material, and other organic materials. A list and map of these sites is included in Appendix D of this EIR.

Given the aforementioned reasons, the Alternative Site Alternative was deemed infeasible and, thus, was rejected from further consideration and analysis and the EIR.

6.9 Environmentally Superior Alternative

Table 6-2 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed Project for each of the issue areas studied.

Table 6-2 Impact Determinations Comparison of Alternatives

Issue	Proposed Project	Alternative 1 (No Project)	Alternative 2 (Alternative Technology Mix)	Alternative 3 (Reduced Intensity)
Agricultural Resources – Soils	Significant and Unavoidable	No Impact (less than proposed Project)	Significant and Unavoidable (similar to proposed Project)	Significant and Unavoidable (less than proposed Project)
Transportation & Circulation – VMT	Significant and Unavoidable	No Impact (less than proposed Project)	Significant and Unavoidable (same as proposed Project)	Significant and Unavoidable (less than proposed Project)

Results of Table 6-2 are summarized as follows:

Alternative 1 (*No Project).* Compared to the proposed Project, Alternative 1 would result in fewer agricultural resources/soils and transportation and circulation/VMT impacts. Such impacts would be less than significant.

Alternative 2 (*Alternate Technology Mix).* Compared to the proposed Project, Alternative 2 would result in similar agricultural resources/soils impacts and the same transportation and circulation/VMT impacts, and these impacts would remain significant and unavoidable.

Alternative 3 (*Reduced Intensity).* Compared to the proposed Project, Alternative 3 would result in reduced agricultural resources/soils impacts and transportation and circulation/VMT impacts, but these impacts would remain significant and unavoidable.

Based on the alternatives' comparison analysis provided above, Alternative 1 would be the environmentally superior alternative. However, under CEQA, another alternative must be selected as the environmentally superior alternative when the No Project Alternative is determined to have the least overall impacts.

Both Alternatives 2 and 3 would have fewer agricultural resources/soils impacts than the proposed project. While Alternative 2 would result in slightly less temporary loss of prime farmland (with an estimated reduction of less than one acre compared to the proposed Project), it would lead to the same amount of permanent prime farmland conversion and is therefore considered to have a similar level of agricultural resources/soils impacts. Alternative 3 would lead to 29 acres of permanent Prime farmland conversion rather than 34.26 acres of permanent Prime farmland conversion under the proposed Project. Alternative 2 would not reduce the proposed Project's transportation and circulation/VMT impacts, but Alternative 3 would.

Alternative 2 would allow the facility to process the same amount of organic material as the proposed Project, whereas Alternative 3 would reduce the amount of organic material that could be processed at the facility compared to the proposed Project. As such, Alternative 2 would do a better job than Alternative 3 of assisting California and the County to meet its composting needs as well as its GHG emissions reduction goals related to solid waste emissions and landfill-diversion goals.

Alternative 3 would, however, reduce the significant, unavoidable environmental impacts of the proposed Project identified in this EIR and Alternative 2 would not. Alternative 3 is therefore the environmentally superior alternative other than the No Project Alternative, although neither alternative would reduce the proposed Project's significant and unavoidable impacts to a less than significant level.

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7 References

7.1 Bibliography

Executive Summary

Harrison Industries. 2018. Commercial Organics Processing Facility Entitlement Plans.

Merriam-Webster. 2020. Definition of *windrow*. https://www.merriam-webster.com/dictionary/windrow (accessed November 2020).

Ventura County of. 2020. Ventura County 2040 General Plan. Adopted September 2020. https://docs.vcrma.org/images/pdf/planning/plans/Final_2040_General_Plan_docs/VCGPU_00_Cover-Acknowledgements-TOC_2020_09_15_web.pdf (accessed November 2020)

1. Introduction

Ventura County of. 2020. Ventura County 2040 General Plan. Adopted September 2020. https://docs.vcrma.org/images/pdf/planning/plans/Final_2040_General_Plan_docs/VCGPU_00_Cover-Acknowledgements-TOC_2020_09_15_web.pdf (accessed November 2020).

Ventura, County of. 2020a. Ventura County Non-Coastal Zoning Ordinance, Division 8, Chapter 1 of the Ventura County Ordinance Code. Last amended December 15, 2020; effective January 14, 2021. Ventura County Planning Division. https://docs.vcrma.org/images/pdf/planning/ordinances/VCNCZO_Current.pdf (accessed March 2021).

2. Project Description

Harrison Industries. 2018. Commercial Organics Processing Facility Entitlement Plans.

Merriam-Webster. 2020. Definition of *windrow*. https://www.merriam-webster.com/dictionary/windrow (accessed November 2020).

Rasmussen & Associates. 2017. Agromin-Limoneira Architectural Plans.

Ventura, County of. 2019. The 2018 Crop and Livestock Report. July 2019. https://vcportal.ventura.org/AgComm/docs/crop-reports/Ag%20Comm%202018%20Crop%20Report%2008-02-19%20web.pdf (accessed November 2020).

Ventura, County of. 2020. Ventura County 2040 General Plan. Adopted September 2020. https://docs.vcrma.org/images/pdf/planning/plans/Final_2040_General_Plan_docs/VCGPU_00_Cover-Acknowledgements-TOC_2020_09_15_web.pdf (accessed November 2020)

3. Environmental Setting

Ventura, County of. 2020. Recently Approved and Pending Projects. https://vcrma.org/recently-approved-pending-projects (accessed October 2020).

Santa Paula, City of. 2020. Other City Project Documents. https://spcity.org/347/Other-City-Project-Documents (accessed October 2020).

4.1 Agricultural Resources – Soils

California Department of Conservation (DOC). 2016. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed October 2020).

Ventura County of. 2020. Ventura County 2040 General Plan. Adopted September 2020. https://docs.vcrma.org/images/pdf/planning/plans/Final_2040_General_Plan_docs/VCGPU_00_Cover-Acknowledgements-TOC_2020_09_15_web.pdf (accessed November 2020).

_____.2019. The 2018 Crop and Livestock Report. July 2019. https://vcportal.ventura.org/AgComm/docs/crop-reports/Ag%20Comm%202018%20Crop%20Report%2008-02-19%20web.pdf (accessed November 2020).

_____. 2011. Initial Study Assessment Guidelines (ISAG). April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed November 2020).

4.2 Transportation & Circulation - VMT

John Oquendo, Senior Planner, County of Ventura, Resource Management Agency, personal communication, November 5, 2020.

Office of Planning and Research (OPR). 2018. Technical Advisory on Evaluating Transportation impacts in CEQA. April 2018. https://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf (accessed November 2020).

Rob Dal Farra, Vice President, Sespe Consulting, Inc, personal communication, April 5, 2020.

Sespe Consulting, Inc. 2017. Air Quality, Climate Change Impact and Health Risk Assessment Agromin Commercial Organics Processing Operation. May 20, 2017.

Ventura County of. 2020. Ventura County 2040 General Plan. Adopted September 2020. https://docs.vcrma.org/images/pdf/planning/plans/Final_2040_General_Plan_docs/VCGPU_00_Cover-Acknowledgements-TOC_2020_09_15_web.pdf (accessed November 2020).

4.3 Less Than Significant Environmental Effects

California Department of Conservation. 2020. Guidelines for Classification and Designation of Mineral Lands. https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf (accessed December 2020).

California Energy Commission (CEC). 2020a. Electricity Consumption by County. http://www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed November 2020).

_____. 2020b. Gas Consumption by County. http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed November 2020).

Padre Associates, Inc. 2019. Phase I Archaeological Resources Report

Ventura County. 2011. Initial Study Assessment Guidelines (ISAG). April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed October 2020).

5. Other CEQA Required Discussions

Southern California Association of Governments (SCAG). 2016. 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). April 7, 2016.

U.S. Census Bureau. 2020. American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), 5-Year Estimates. Persons Per household, 2014-2018. https://www.census.gov/quickfacts/fact/table/venturacountycalifornia/HSD310218#HSD310218 (accessed November 2020).

6. Alternatives

United States Environmental Protection Agency (US EPA). 2021. Types of Composting and Understanding the Process. https://www.epa.gov/sustainable-management-food/types-composting-and-understanding-process (accessed September 2021).

7.2 List of Preparers

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