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Governor's Office of Planning & Research

December 3, 2021

Dec 03 2021

John Oquendo
County of Ventura, Planning Division
800 South Victoria Avenue, #1740
Ventura, CA 93009

STATE CLEARINGHOUSE

RE: Agromin-Limoneira Organics Processing
Operation – Draft Environmental Impact
Report (DEIR)
SCH# 2020039054
GTS# 07-VEN-2020-00463
Vic. VEN-126 PM 6.953

Dear John Oquendo,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project proposes 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. The expansion would result in the removal of 55 acres of existing citrus orchard. The project would result in the direct, permanent loss of approximately 34.26 acres of Prime Farmland to an agricultural accessory use. Use of 22 acres of the Project site for landscaping, retention basins, and native soil areas (including compost piles) would remove these areas from agricultural production but would not necessarily result in permanent conversion of agricultural land.

The nearest State facility to the proposed project is SR-126. After reviewing the DEIR, Caltrans has the following comments:

As stated in the DEIR and Appendix C, Vehicle Miles Travelled (VMT) Analysis, the project would generate a peak day increase of 2,896 VMT per day. This increase in VMT is due to increased vehicle trips associated with incoming waste, incoming deliveries, additional compost being sold, and the Project's 26-employee net increase. This increase to net VMT in the area is considered a significant environmental impact.

Mitigation measures discussed in Appendix C were not considered viable due to the project's land use context and relative isolation. Caltrans does not concur with this assessment due to the future potential for the project site to be accessed via active modes of transportation. The Ventura Countywide Bicycle Master Plan has identified the trip from Ventura to Santa Paula as a Bikeway Network Gap. To address this gap the Master Plan has proposed a Class 1 multi-use trail called

the Santa Paula Branch Line Trail. This 32 mile multi-use path has already completed segments in the city of Santa Paula, and the planned extension through the project area could use Telegraph Road, Highway 126, or the Santa Paula Branch Line right-of-way, all of which are adjacent to or very near the proposed project's primary entrance. For this reason, Caltrans strongly recommends including the following mitigation measures discussed in the VMT analysis:

- Secure, covered bicycle parking.
- On-site amenities for employees, such as showers, locker rooms, and a bicycle repair station.
- Provide incentives or subsidies that increase the use of modes other than single-occupancy vehicle.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-VEN-2020-00463.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

Cc: State Clearinghouse