Appendix C

Vehicle Miles Traveled (VMT) Analysis

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Project No: 20-09553

John Oquendo, Senior Planner
County of Ventura, Resource Management Agency
800 S. Victoria Avenue, L#1740
Ventura, California 93009
Via email: John.Oquendo@ventura.org

Subject: **Draft Agromin-Limoneira Commercial Organics Processing Operation Project, Vehicle Miles Traveled (VMT) Analysis**

Dear Mr. Oquendo:

This letter provides the results of a vehicle miles traveled (VMT) analysis for the Agromin-Limoneira Commercial Organics Processing Operation Project (Project or proposed Project). This memorandum discusses existing and future VMT conditions for the Project and assesses the Project's impact on VMT for the purposes of addressing consistency with California Environmental Quality Act (CEQA) Guidelines Section 15064.3, subdivision (b).

Project Background

The Project site is located at the south end of Edwards Ranch Road in unincorporated Ventura County, southwest of the city of Santa Paula (Figure 1 and Figure 2). Agromin currently operates the 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 their 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[1] 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.

Once constructed, the Project would process and compost approximately 295,000 tons per year of green and food materials, using a combination of open windrows, Covered Aerated Static Piles (CASP), and Anaerobic Digesters (AD). Feedstock material would be collected from various residential and

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

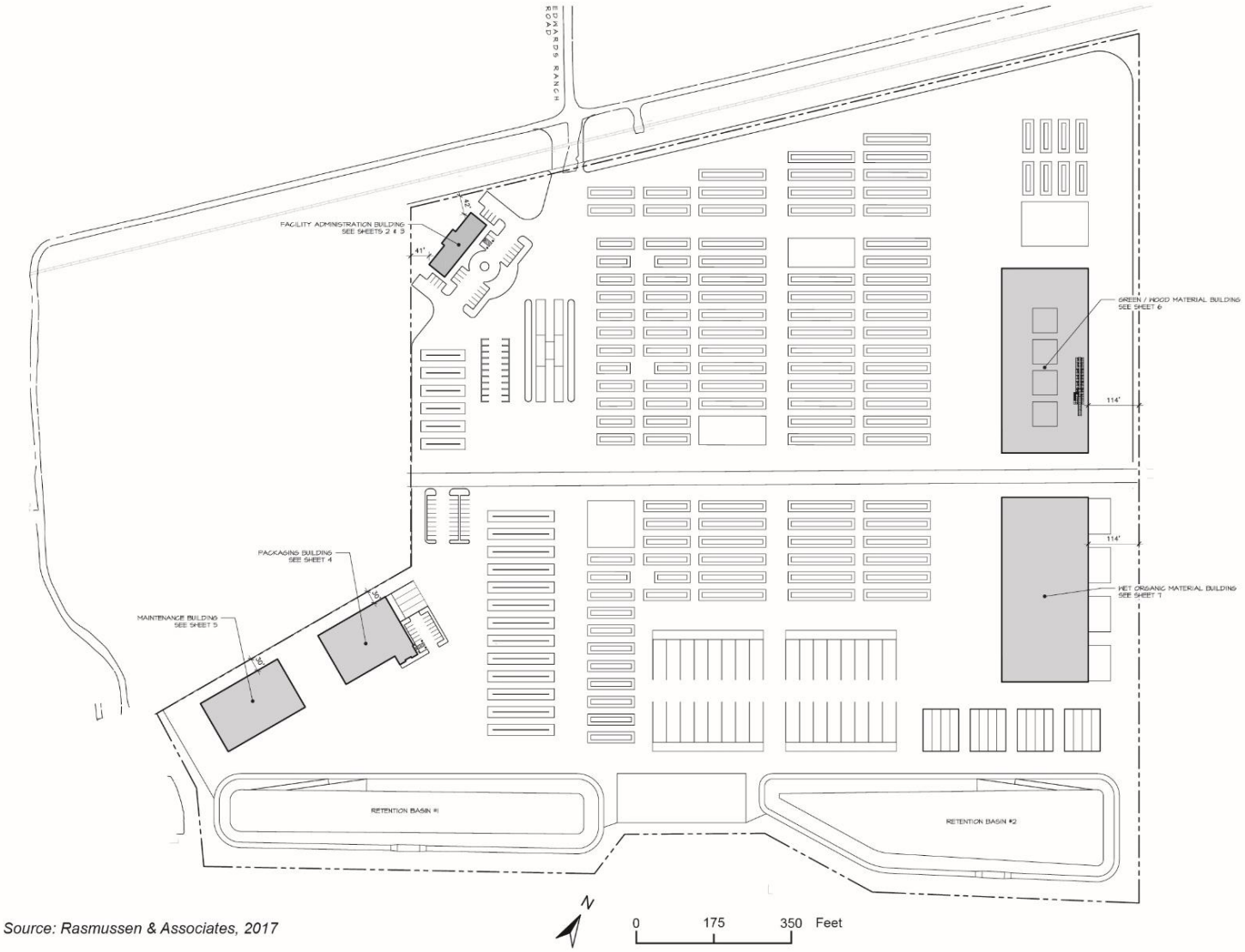
commercial sources throughout Ventura County as well as the City of Carpinteria and delivered to the Project via haul trucks for processing. The Project also would receive additional feedstocks from self-haulers (e.g., landscapers, contractors, residents) as well as shipments of soil amendment products (e.g., peat moss, gypsum, mulch, etc.), which would be blended with compost to produce specialty organic products. Finished products would either be sold on-site in bulk or bagged/packaged on-site for sale to retail outlets throughout the County. See Figure 3 for a site plan and Figure 4 for a process flow diagram which displays the Project layout and processing operations.

Figure 1 Regional Location

Figure 2 Project Location

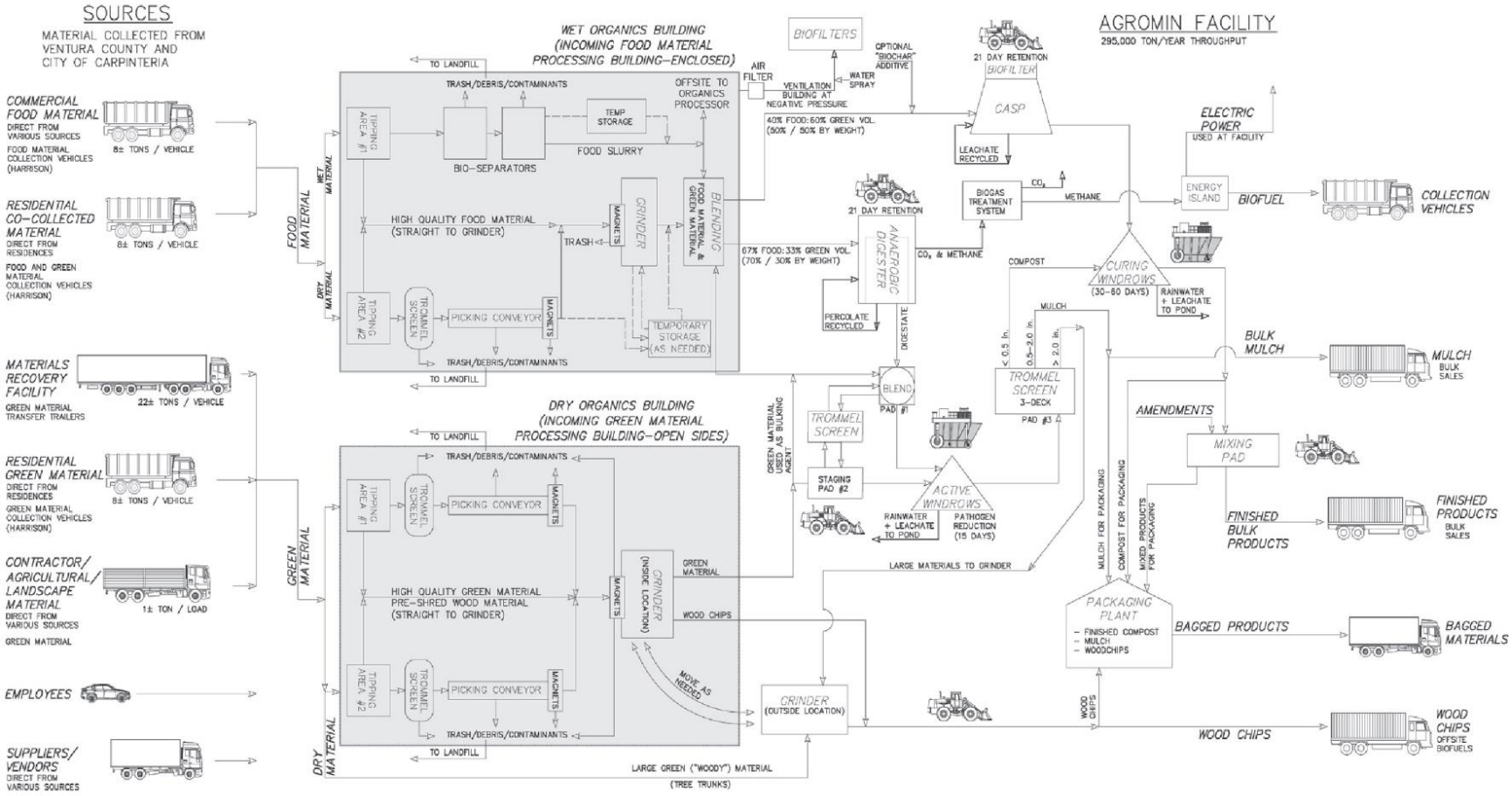
Imagery provided by Microsoft Bing and its licensors © 2020.

Figure 3 Site Plan



Source: Rasmussen & Associates, 2017

Figure 4 Process Flow Diagram



Source: Sespe Consulting, Inc., 2017.

Regulatory Setting

Senate Bill 743 – Transportation Impacts

Senate Bill 743 (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 Climate Action 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 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 Cal. Code of Regs., 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. For a land use project like the proposed Project, "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact… Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact." See section 15064.3(b)(1).
3. "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)
4. 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).

Ventura County General Plan

Circulation, Transportation, and Mobility Element

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

- **Policy CTM-1.1: 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 State 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 five 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:

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. 2020b. Ventura County 2040 General Plan. Adopted September 2020. https://docs.vcrma.org/images/pdf/planning/plans/Final_2040_General_Plan_docs/VCGPU_04_Circulation_Element_2020_09_15_web.pdf (accessed November 2020)

If a proposed project is found to have a significant impact on VMT, the impact must be reduced, as feasible[2], 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.

Ventura County Non-Coastal Zoning Ordinance

Sec. 8109-0.7 – Transportation Demand and Trip Reduction Measures

This section discusses the minimum requirements prior to the approval of discretionary development as it relates to standards for transportation demand management and trip reduction measures. These standards provide an opportunity to reduce VMT and encourage mode shift to non-vehicular travel modes. The section 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.

[2] "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.

Approach

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. Implementation Program CTM-P: Interim Vehicle Miles Traveled CEQA Assessment Criteria requires that, following June 30, 2020 and prior to completion of Implementation Program CTM-B, all projects (not exempt from CEQA analysis) should be evaluated for potential environmental impacts relative to VMT using the State's minimum reduction standards. According to the County, the proposed Project would be considered an infrastructure project, since it will serve a public need for waste reduction and is 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 release 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. Trip-based VMT analysis is recommended over boundary-based VMT analysis as the most appropriate methodology for analyzing VMT impacts under CEQA. Trip-based VMT analysis captures the full extent of the vehicle trip length, even the portion that extends beyond the jurisdictional boundary. This analysis utilizes a trip-based VMT analysis consistent with the recommendations in OPR's Technical Advisory.

VMT Assessment

New VMT that would result from the proposed Project were estimated by Sespe Consulting, Inc. (Sespe) in the Air Quality, Climate Change Impact and Health Risk Assessment for the proposed Project (May 2017, Appendix A). As shown in Figure 4, trips coming into the facility would include materials collected from the County of Ventura and City of Carpinteria, employees, and supplies vendors. 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 Materials Recovery Facility (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 collection vehicles leaving the facility, mulch bulk sales, finished product bulk sales, bagged materials, and wood shipped off-site for biofuels. Incoming and outgoing

trips also include an average of approximately 10 visitors per day to the site, accounting for the project's educational component.

Sespe's calculation of baseline trip distances included a number of assumptions associated with current material travel to Agromin's existing operations at Oxnard and Santa Paula and to the Toland Road Landfill:

- Green and food material currently going to the Toland Road Landfill is first delivered by trash trucks to the Gold Coast 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, there are two segments to the baseline trip distances for the material currently going to the landfill.
- Green and food material currently going to existing operations at the Project site and green material going to existing operations at the Oxnard-Shoreline facility are primarily direct trips from the source of generation. The source of generation for incoming trips was assumed to be the same as the California Department of Resource Recycling and Recovery waste generation profile by area shown in Table 1.
- The trip distance for incoming trips was assumed to be from a central point at each municipality to either the MRF or the existing operations at Oxnard or Santa Paula (see Table B7, Appendix A).

Table 1 Incoming Waste Generation Source

Location	Waste Generation 2014 (tons/year)	Percent of Total Trips
Camarillo	45,359	8.6%
Carpinteria	9,240	1.8%
Ojai	7,070	1.3%
Oxnard	249,317	47.4%
Port Hueneme	15,324	2.9%
Ventura	116,973	22.2%
Santa Paula	20,442	3.9%
Unincorporated County	62,162	11.8%
Totals	**525,886**	**100%**

Source: Sespe Consulting, Inc. 2017; Appendix A

As outlined in Table 2, baseline VMT is 1,798,126 annual VMT, or 7,681 peak day VMT, with a majority of the VMT being generated due to waste going to the Gold Coast MRF and then the Toland Road Landfill.

Table 2 Baseline Vehicle Miles Traveled (VMT)

		Vehicle Miles Traveled (VMT)		
Category	**Trip Type**	**Average Distance per Roundtrip**	**VMT Per Year**	**Peak Day VMT**
Incoming Waste	Commercial (FL)	18.3	0	0
	Residential (SL)	18.3	120,481	458
	MRF – Ventura (TT)	24.5	67,540	245
	MRF – Santa Barbara (TT)	24.5	7,415	49
	Business Haul	18.3	44,154	165
	Self-Haul	18.3	93,622	348
	Roll-Off	18.3	22,059	92
		Total	**355,272**	**1,356**
Incoming Deliveries	Organics	50	4,266	100
	Packing and fertilizer		1,405	100
	Sand and soil		23,536	151
	Miscellaneous		5,420	100
		Total	**34,626**	**452**
Outgoing Sales	Bobtail Truck	30	30	0
	Roll-off	30	13,470	90
	Transfer Trailer	30	66,150	270
	Sales Yard Delivered	30	83,736	390
	Sales Yard Self Haul	30	65,160	270
		Total	**228,546**	**1,020**
Employees	Employee	20	212,160	760
	Visitor	20	52,000	220
	TBD	20	0	0
		Total	**264,160**	**980**
Existing to Landfill	To Ventura MRF (SL/FL)	18.8	529,533	2,239
	MRF to Toland (TT)	38	385,989	1,634
		Total	**915,522**	**3,873**
		Baseline Total VMT	**1,798,126**	**7,681**

MRF = Materials Recovery Facility; SL = side loader; FL = front loader; TT = transfer trailer semi

Source: Sespe Consulting, Inc. 2017; Appendix A

Table 3 outlines the Project's calculated VMT. The Project would result in approximately 2,392,308 annual VMT, or approximately 10,577 peak day VMT. As shown in Table 3, the large amount of VMT previously generated due to waste going to the MRF and then the Toland Road Landfill under baseline conditions would be eliminated, since with the proposed Project green and food waste would be going directly to the Project site. However, since this waste would no longer be going to the Toland Road Landfill, the incoming waste to the Project would increase as compared to baseline conditions. Further, the proposed Project would increase on-site processing and composting of green and food waste from 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, if the Project is approved, also have the option of doing so at the Project site (resulting in a net decrease of six miles average roundtrip distance). 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 3 Project Vehicle Miles Traveled (VMT)

		Vehicle Miles Traveled (VMT)		
Category	**Trip Type**	**Average Distance per Roundtrip**	**VMT Per Year**	**Peak Day VMT**
Incoming Waste	Commercial (FL)	24.8	218,454	941
	Residential (SL)	24.8	251,983	1,089
	MRF – Ventura (TT)	23.9	119,034	526
	MRF – Santa Barbara (TT)	23.9	29,759	143
	Business Haul	24.8	135,113	594
	Self-Haul	24.8	661,136	2,823
	Roll-Off	24.8	35,641	173
		Total	**1,451,119**	**6,290**
Incoming Deliveries	Organics	46	10,222	93
	Packing and fertilizer		3,367	93
	Sand and soil		56,402	279
	Miscellaneous		12,988	139
		Total	**82,980**	**603**
Outgoing Sales	Bobtail Truck	24	70	0
	Roll-off	24	31,579	144
	Transfer Trailer	24	155,084	672
	Sales Yard Delivered	24	196,313	840
	Sales Yard Self Haul	24	152,763	648
		Total	**535,809**	**2,304**
Employee	Employee	20	270,400	1,160
	Visitor	20	52,000	220
	TBD	20	0	0
		Total	**322,400**	**1,380**
		Total Project VMT	**2,392,308**	**10,577**

FL = front loader; SL = side loader; TT = transfer trailer semi

Source: Sespe Consulting, Inc. 2017; Appendix A

Results

As outlined in Table 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. Although the Project would divert trips from the Gold Coast MRF and Toland Road Landfill to the Project site and result in shorter trip lengths for those purchasing compost, the increase in VMT is largely due to the increase in incoming waste, the additional compost being sold in bulk, and the increase in employees.

Table 4 Summary of Net Increase in 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**

Conclusion

The results of the VMT analysis indicate that the Project would result in a net increase in VMT in the area. This is considered a significant impact.

No feasible mitigation measures have been identified that would reduce the Project's net change in VMT to zero or less. 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. 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

While these measures could reduce additional VMT, especially VMT generated by additional employee trips, the infrastructure/community serving land use context of the Project and its relatively isolated location limiting opportunities for alternative modes of transportation such as carpooling, transit, biking, and walking, makes meaningful reductions in VMT difficult to achieve. As a result, there is no feasible mitigation currently available. Therefore, the VMT impact is expected to remain significant and unavoidable.

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 and AB 1826. Although GHG emissions are created by the composting process, these are outweighed by the avoided uncontrolled GHG emissions associated with landfills.[3]

[3] 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

- 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 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 to be produced by the Project's dry Anerobic Digestion Facility will assist the State in meeting that goal. Biomethane generated from the anaerobic digestion of food material and green material has been determined by the California Air Resources Board to be carbon negative.
- Facilitate waste diversion and landfill space conservation through green/food waste composting.
- Provide a convenient, environmentally compliant, and cost-effective facility for the recycling of food waste, green waste, 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 to increase the use of organic products by farmers, landscape companies, golf courses, parks department, and other similar users of such products.

As outlined above, the 2040 General Plan Policy CTM-1.2: Projects with Significant Transportation Impacts indicates if there is no feasible mitigation measures available to reduce project impacts to a less than significant level the County decision-making body may make a statement of overriding consideration (pursuant CEQA) which determines that the benefits of the Project outweigh the unavoidable adverse environmental impacts.

Sincerely,
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Attachments

Attachment A Air Quality, Climate Change Impact and Health Risk Assessment for the Agromin Commercial Organic Processing Operation, Sespe Consulting Ince. May 2017

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.