



November 29, 2021

Governor's Office of Planning & Research

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STATE CLEARINGHOUSE

John Oquendo, Senior Planner
Ventura County Resource Management Agency
Planning Division
800 South Victoria Avenue, L#1740
Ventura, CA 93009

Subject: SCH No. 2020039054 – Draft Environmental Impact Report for Agromin-Limoneira Commercial Organics Processing Operation, SWIS No. 56-AA-0147 – Ventura County

Dear Mr. Oquendo:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

The Ventura County Resource Management Agency, Planning Division, acting as Lead Agency, has prepared and circulated a Draft Environmental Impact Report (DEIR) in order to comply with CEQA and to provide information to, and solicit consultation with, Responsible Agencies in the approval of the proposed project.

The proposed Agromin-Limoneira Commercial Organics Processing Operation (proposed project) is located on Tax Assessor's Parcel Number (APN) 090-0-180-085. The proposed project will be located on 70-acres. Currently, 15-acres is used for an agricultural composting operation. The remainder of the subject parcel includes lemon orchards, three propane powered windmills, and oil and gas wells.

The applicant requests that a Conditional Use Permit (CUP) and an ordinance text amendment to the Ventura County Zoning Non-Coastal Ordinance be granted to authorize a new commercial organics processing operation in an unincorporated area of Ventura County, near the City of Santa Paula. The CUP will expand an existing 60,000 tons per year agricultural material composting operation into a 295,000 tons per year (1,250 tons per day) large-scale commercial organics processing operation. The project will expand the existing facility from 15-acres to 70-acres. The facility will operate Monday through Saturday (6:00am to 6:00pm) with remote monitoring on Sunday and employ 37 people. The site will have a storage capacity of 153,000 cubic yards.

Water will be provided by the City of Santa Paula via a new service connection to existing infrastructure at Todd Road and wastewater disposal will be handled by a new Onsite Wastewater Treatment System (OWTS).

The CUP includes a request to construct and operate the following components of the proposed commercial organics operation:

- Two (2) 80,925 square foot (sq. ft.) organics processing buildings to process food and green materials into compost;
- A 40,000 ton per year (AD) anaerobic digestion system (an in-vessel digestion system that produces compost and methane rich biogas for use onsite);
- A 75,000 ton per year positive pressure covered aerated static pile (CASP) system to process green and food organic materials into compost;
- Continued but expanded open windrow composting of organics (green material) only;
- A 23,107 sq. ft. production/packaging building that contains a bagging operation that produces bagged mulch, woodchips and compost products;
- A 25,000 sq. ft. maintenance building to be used for storage as well as maintenance of onsite mobile equipment, facility equipment and delivery vehicles;
- A two-story 13,516 sq. ft. administration building;
- A scale house building near the proposed project entrance at Edwards Ranch Road;
- Multiple water storage tanks totaling 530,000 gallons (a 50,000-gallon domestic water tank, a 120,000-gallon operations water tank and three (3) 120,000-gallon fire water storage tanks); and,
- Two (2) water drainage retention ponds (approximately 43.5 acre-ft. total storage capacity).

COMMENTS

CalRecycle staff's comments on the proposed project are listed below. Where a specific location in the document is noted for the comment, please ensure the comment is addressed throughout all sections of the DEIR, in addition to the specific location noted.

Section 4.2.1.1, Baseline Vehicle Miles Traveled (VMT), Table 4.2-1. - The DEIR discusses categories of Baseline VMT per year and VMT per day.

Comment: How does this translate into number of vehicles per day? How many vehicles per day will be entering the facility? This may be a permitted parameter for the Solid Waste Facility Permit.

Solid Waste Regulatory Oversight

The Ventura County Resource Management Agency, Environmental Health Division is the Local Enforcement Agency (LEA) for Ventura County and responsible for providing regulatory oversight of solid waste handling activities, including permitting and

inspections. Please contact the LEA, Sean Debley at 805.648.9248 or by email at sean.debley@ventura.org to discuss the regulatory requirements for the proposed project.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency preparing the Final EIR and in carrying out their responsibilities in the CEQA process. CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 916.341.6084 or by e-mail at theodore.tasiopoulos@calrecycle.ca.gov.

Sincerely,



Theodore Tasiopoulos, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Ben Escotto, Supervisor
Permitting & Assistance Branch – South Unit

Sean Debley, Manager
Ventura County LEA