

Appendix A

Notice of Preparation and Initial Study



Notice of Preparation of an EIR

County of Ventura • Resource Management Agency • Planning Division

800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • vcrma.org/divisions/planning

The County of Ventura, Resource Management Agency, Planning Division, as the Lead Agency under the California Environmental Quality Act (CEQA), is processing an application for a Conditional Use Permit and Ordinance Text Amendment as described below. The Planning Division completed an Initial Study for the proposed project and determined that the proposed project (individually and cumulatively) may have a significant effect on the environment and an Environmental Impact Report (EIR) is required. The purpose of this notice is to call your attention to this project, and to request that you assist the Planning Division identify any issues that should be addressed in the EIR. Information on the proposed project and instructions on how to provide commentary on the scope of the EIR are provided below.

Project Name: Agromin-Limoneira - Commercial Organics Processing Operation, Case No. PL17-0154.

Applicant: Bill Camarillo, CalWood, Inc. (dba Agromin)

Project Location: The proposed project is located on Tax Assessor's Parcel Number (APN) 090-0-180-085. The APN is part of a larger 994-acre lot subdivided in compliance with the Subdivision Map Act pursuant to a Certificate of Compliance recorded in instrument No. 20140507-00057264-0. The project will be located on 70-acres. Currently 15-acres is used for an agricultural composting facility. The remainder of the subject parcel includes lemon orchards, the historic Edwards Adobe, agricultural-accessory dwellings, and oil and gas wells. The subject property is located within the Saticoy and Santa Paula 7.5 Minute Series Topographic Quadrangle Maps (USGS, 2015).

Project Description: 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 for a term of 50 years in an unincorporated area of Ventura County, near the City of Santa Paula. The Conditional Use Permit will expand an existing 60,000 tons per year Agricultural Material Compost Operation into a 295,000 tons per year Large-Scale Commercial Organics Processing Operation. The project will expand the existing facility from 15-acres to 70-acres. The facility will operate 6 days a week (with remote monitoring on Sunday) and employ 37 people.

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).

In accordance with Titles 14 and 27 of the California Code of Regulations, the Project would be considered a Compostable Materials Handling Facility requiring a Full Solid Waste Facility Permit.

The CUP includes a request 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, 75,000 ton per year positive pressure covered aerated static pile (CASP) system to process food and organic materials into compost (The CASP system will be comprised of two groups of eight individual CASPs units totaling 16 CASPs), Continued but expanded open windrow composting of organics (green material) only, consisting of active, aerobic composting of green materials in long, narrow uncovered pile, a 23,107 sq. ft. production/packaging building contains a bagging operation producing 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 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 120,000 gallon fire water storage tanks), two (2) water drainage retention ponds (approximately 43.5 acre-ft. total storage capacity).

The request also includes an amendment to the Non-Coastal Zoning Ordinance (NCZO), which is being required by the County to allow for development of the Project, due to inconsistencies between the Project and NCZO Section § 8107-36.4.1.a. Per NCZO §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. The applicant proposes a zoning text amendment which will add provisions to the NCZO for the development of organics processing operations in the AE (Agricultural Exclusive) zone on land with classified agricultural soils (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). Criteria developed within the proposed zoning text amendment include: a limitation of the cumulative total loss from operations permitted under these provisions to 200 acres, a maximum operation size of 100 acres, and limitation of the feedstock to sources generated and collected from Ventura County and the City of Carpinteria. The full text of the proposed Non-Coastal Zoning Ordinance amendment may be found in the Initial Study.

List of Potentially Significant Impacts for Analysis in the EIR: The Planning Division prepared an Initial Study which revealed that the project has the potential to create significant impacts to Agricultural Resources – Soils which must be analyzed as part of an EIR.

The Initial Study identifies mitigation measures which avoid or reduce potentially significant impacts of the project to a less than significant level for the following issues: Air Quality (Ventura County Air Pollution Control District, Planning Division), Water

Resources – Surface Water Quality (Watershed Protection District), Biological Resources (Planning Division), Cultural Resources – Historic (Planning Division), Noise and Vibration (Planning Division), Public Health (Environmental Health Division), Transportation & Circulation – Roads and Highways – Safety and Design of Public Roads (Public Works Agency), Waste Treatment & Disposal Facilities – Solid Waste Facilities (Environmental Health Division).

Public Review Period: The 30-day public review period of the Notice of Preparation is from March 20, 2020 to April 20, 2020. Please send your comments to:

**Ventura County Resource Management Agency, Planning Division
Attn.: John Oquendo, Case Planner
800 South Victoria Avenue, L#1740
Ventura, CA 93009**

The public is encouraged to submit written comment to John Oquendo, no later than 5:00p.m. on April 20, 2020 to the address listed above. Alternatively, you may email your comments to Mr. Oquendo at John.Oquendo@ventura.org or fax them at (805) 654-2509.

A copy of the Initial Study is available on the Planning Division website at: <https://vcrma.org/environmental-impact-reports>. The document is also available for review and/or purchase at the Planning Division's public counter on the 3rd floor of the Hall of Administration Building in the Ventura County Government Center located at 800 South Victoria Avenue, Ventura, CA.

Scoping Meeting: All interested persons, affected agencies, responsible agencies, and trustee agencies are invited to attend the scoping meeting, in order to assist the Planning Division with identifying any issues that should be addressed in the EIR and to provide comments on the scope of analysis of the EIR. The scoping meeting will be held on **Tuesday, March 31, 2020 3:00 PM to 5:00 PM** in the Ventura County Hall of Justice – Pacific Conference Room, 1st Floor, located at 800 S. Victoria Avenue, County Government Center, Ventura, CA 93009.



County of Ventura Planning Division

800 South Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2488 • <http://www.ventura.org/rma/planning>

Initial Study for Agromin-Limoneira Commercial Organics Processing Operation Conditional Use Permit and Non-Coastal Zoning Ordinance Text Amendment

Section A – Project Description

1. **Project Case Number(s):** PL17-0154
2. **Property Owner:** Limoneira Company
3. **Applicant:** Bill Camarillo, CalWood, Inc. (dba Agromin), 201 Kinetic Drive, Oxnard, CA 93030
3. **Project Location and Assessor's Parcel Number(s):** The project site is located at the terminus of Edwards Ranch Road, south of State Highway 126, approximately five miles west 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.
4. **Existing General Plan Land Use Designation and Zoning Designation of the Project Site:**
 - a. **General Plan Land Use Designation:** Agricultural
 - b. **Zoning Designation:** AE 40 ac (Agricultural Exclusive, 40-acre minimum lot size)
5. **Description of the Environmental Setting:** The proposed project is located on Tax Assessor's Parcel Number (APN) 090-0-180-085. The APN is part of a larger 994-acre lot subdivided in compliance with the Subdivision Map Act pursuant to a Certificate of Compliance recorded in instrument No. 20140507-00057264-0. The project will be located on 70-acres. Currently 15-acres is used for an agricultural composting facility. The remainder of the subject parcel includes lemon orchards, the historic Edwards Adobe, agricultural-accessory dwellings, and oil and gas wells. The subject property is located within the Saticoy and Santa Paula 7.5 Minute Series Topographic Quadrangle Maps (USGS, 2015).

Existing Operations:

The site is currently occupied by a 15-acre agricultural material composting operation licensed through CalRecycle under a 2005 Enforcement Agency

Notification (SWIS #56-AA-0147) with an annual loading of 60,000 tons per year. 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. Material feedstock is received at the site via truck deliveries; truck loads that exceed 1% of contaminants 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 any use other than agriculture, 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, and turning the materials by heavy equipment. Equipment presently operated on the site includes grinders, screeners, loaders, tractors and an excavator. Volume of waste and material handled on-site 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 (2) portable toilets and three (3) 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 farmer worker dwelling units, and agricultural accessory and support structures and improvements.

Oil and Gas Facilities On-Site:

The site has a history of oil and gas production beginning in the 1960's. Historic topographic maps and records from the Division of Oil, Gas and Geothermal Resources (DOGGR) show approximately ~~ten (10)~~nine (9) oil wells and four (4) oil sumps within the Project area. ~~Eight All of the oil wells are abandoned, one is an active producing well and one an idle waterflood injection well.~~¹ An existing 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 current boundary of the existing agricultural material composting operation. The proposed project will support access to these wells by the oil company as required by DOGGR.

Easements:

Existing easements through the proposed project site are shown on the attached plans (Attachment 2). Easements within the project area include:

¹ Modifications to text in this Initial Study since this document was originally published are shown in underline and ~~strikeout~~ with grey shading. These changes were made to correct minor errors in the text and do not represent substantial changes.

- 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 Ventura County Transportation Commission Committee;
- Southern California Edison (SCE) easements for public utilities and incidental purposes; and
- An 8-foot-wide easement for petroleum pipelines owned by the Shell Oil Company.

Table A1 – Surrounding Zoning and Land Uses:

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

6. Project Description: 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 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 proposed project would utilize a combination of open windrows, Covered Aerated Static Piles (CASPs), and Anaerobic Digestion (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 project site will be accessed from the intersection of Telegraph Road and Olive Road (both public rights-of-ways) south to Edwards Ranch Road (a private road) and crossing at the Southern Pacific Railroad right-of-way. Options for off-site secondary access for public safety purposes include utilization of existing private roads to Todd Road (includes a railroad crossing over

Todd Barranca) or to Darling Road (includes a railroad crossings over Ellsworth Barranca).

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).

Buildings:

The proposed project includes the construction of six new structures.

Table A2 – Building Coverage

Structure	Building Coverage² (Square Feet [sq. ft.])
Facility Administration Building	7,022
Scale House	13,800
Maintenance Building	25,000
Production/Packaging Building	23,107
Wet Organics Building	80,925
Dry Organics Building	80,925
Total Building Coverage	230,779
Net Building Coverage Percentage	7.6

The Facility Administration Building will be approximately 13,516 sq. ft., and 35 ft. in height. The building will include two classrooms, 14 office spaces, a conference room, and four restrooms. There would be 21 parking spaces and two handicap accessible spaces adjacent to the building.

A scale house (unenclosed area of 12,500 sq. ft.) with two scales will be located just south of the Facility Administration Building along the alignment of Edwards Ranch Road.

The Maintenance Building will 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 onsite processing equipment, onsite mobile equipment and company-owned delivery vehicles.

The Production/Packaging Building will be approximately 23,107 sq. ft. and 33 ft. in height. The building would include the main packaging floor, five offices, a break

² Building Coverage: The ratio of the area of land covered by buildings to total lot area, expressed as percent coverage. For purposes of this definition, "building" is any structure having a roof supported by columns or walls, and "building area" is the area included within the surrounding exterior walls or columns of a building, exclusive of courts.

room, a conference room, and two restrooms. There would be 15 parking spaces and two handicap accessible spaces for employees adjacent to this building. In addition to employee parking, the production/packaging facility would include four loading docks.

The Wet Organics Building (food waste) 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 (4) biofilters to control volatile organics (VOCs) and odor emissions.

The Dry Organics Building (green waste) will 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.

The expansion of the existing 15-acre agricultural organics processing operation to the proposed commercial organics processing facility would result in the removal of 50 acres of existing citrus orchard. Additionally, three propane-powered windmills will be removed as part of the orchard removal.

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. A text amendment to the NCZO is proposed as part of the project in order 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.

Operational Components:

Incoming green and food water materials would be unloaded, processed, screened, and sorted inside the wet and dry process buildings. The dry organics building would process green/woody materials while the wet organics building would process food and other potentially odorous materials. Both buildings will accommodate tipping areas, 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 digesters or covered aerated static piles.

A 40,000 ton per year anaerobic digestion (AD) system would produce high-quality compost and methane rich biogas. The biomethane generated would be used to fuel an internal combustion combined heat and power (CHP) 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 4-bay AD units. Each 4-bay AD unit includes approximately a 3600 sq. ft. concrete pad, four (4) prefabricated steel insulated tunnels (each 12 ft. by 40 ft, and 12 ft in height), an above ground percolate tank (12 feet in width, 10 feet in height, and 48 feet in length) with 2 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 positive pressure covered aerated static pile (CASP) system will aerobically decompose green and food organic materials into useable compost. The CASP system will be comprised of two groups of eight individual CASPs units totaling 16 CASPs.

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

The Production/Packaging Building will include a bagging operation. Producing mulch, woodchips and compost products would be bagged or in bulk (weighed) 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 transported off-site to the end user by company-owned vehicles.

On-site water storage would be located on the southern border site and would include a 50,000-gallon domestic water tank, 120,000-gallon operations water tank, and three 120,000-gallon fire water storage tanks.

Proposed drainage improvements include two water drainage retention ponds (approximately 43.5 acre-ft. total storage capacity) located on the south, down gradient, edge of the Project site that covers approximately 7.3 acres.

The project will require road improvements at the intersection of Telegraph Road and Edwards Ranch Road, including construction of a right turn lane on the eastbound side Telegraph Road, installation of 150-foot storage length for both the westbound left turn lane and the eastbound right turn lane on Telegraph Road, and pavement widening and utility relocation for the southwest and southeast corners of Telegraph Road/Edwards Ranch Road to accommodate large truck movements into the project site.

The total expected project life is 50 years. No employees will reside on the project site. Currently, the existing composting operation has 11 full-time employees. The proposed project would increase the total number of full-time equivalent employees to 37.

Table A3 - Facility Employees and Hours of Operation

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

In accordance with Titles 14 and 27 of the California Code of Regulations, the Project would be considered a Compostable Materials Handling Facility requiring a Full Solid Waste Facility Permit.

7. Regulatory Framework: The State of California has implemented several legislative changes which have accelerated the need for organic composting facilities across the State. Solid waste diversion and reductions in greenhouse gas emissions are now mandated by the California Air Resources Board (CARB) in conjunction with the California Department of Resources Recycling and Recovery (CalRecycle). The key developments are summarized below:

- Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (AB 32, Chapter 488, Statutes of 2006) charges CARB with “monitoring and regulating sources of emissions of greenhouse gases that cause global warming in order to reduce emissions of greenhouse gases (GHGs).” CARB is responsible for administering the multi-year program to limit California’s GHG emissions to 1990 levels by 2020. Since then, Senate Bill (SB) 32 (Pavley, Chapter 249, Statutes of 2016) was enacted, which set a statewide GHG emission target of 40 percent below the 1990 level by 2030. AB 32 also creates the State’s Climate Change Scoping Plan to achieve the maximum technologically feasible and cost-effective GHG emission reductions by 2020. As part of this Scoping Plan, the State is moving towards the elimination of organic materials in landfills specifically targeting methane, which has a high global warming potential.
- SB 1383 (Lara, Chapter 395, Statutes of 2016). As required by SB 1383, Cal Recycle in consultation with CARB, is charged with developing regulations to reduce disposal of organic waste by 50 percent of 2014 levels by 2020 and 75 percent by 2025.
- AB 1826 (Chesbro, Chapter 727, Statutes of 2014) requires businesses and multi-family developments (exceeding five units) to recycle organic waste (green material, food material, wood waste) as of April 1, 2016. These materials may be processed by composting and grinding (mulch production).

8. List of Responsible and Trustee Agencies: Los Angeles Regional Water Quality Control Board, California Department of Fish and Wildlife, California Department of Recycling (CalRecycle), Resources Management Agency - Environmental Health Division, Ventura Local Agency Formation Commission.

9. Methodology for Evaluating Cumulative Impacts: Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time [California Environmental Quality Act (CEQA) Guidelines, 2014c, § 15355].

In order to analyze the proposed project’s contribution to cumulative environmental impacts, this Initial Study relies on both the list method in part (e.g., for the analysis of impacts on biological resources) and the projection (or plans) method in part (e.g., for the analysis of cumulative traffic impacts).

With regard to the list method, this Initial Study evaluated the proposed project’s contribution to cumulative impacts associated with related past, present, and

reasonably foreseeable probable future projects [CEQA Guidelines, 2015c, § 15064(h)(1)] – mainly those located within proximity to the project sites and have the potential to contribute to the impact that is evaluated in this Initial Study. Section A includes a list of pending and approved projects within the County of Ventura and cities of Santa Paula and Ventura. A map of pending and approved projects are attached (Attachment 3).

With regard to the projection method, this Initial Study includes an analysis of whether the project will comply with the requirements of a plan, regulation, or program specified by law or adopted by a public agency with jurisdiction over the affected resource, which in itself has been subject to environmental review pursuant to the CEQA Guidelines [§ 15064(h)(3)]. For instance, in order to address the potential cumulative adverse impacts of traffic on the Regional Road Network (RRN), County staff evaluated the proposed project in light of the Ventura County Traffic Impact Mitigation Fee (TIMF) Ordinance 4246 and policies of the Ventura County General Plan Goals, Policies and Programs (2013c; Policy Section 4.2.2), which require that the Transportation Department of the Public Works Agency collect a TIMF for development projects that make a cumulatively considerable contribution to the RRN.

Table A4 – Ventura County Unincorporated Area Pending and Recently Approved Projects within 5 Mile Radius

Permit No.	Permit Type	Description	Status
County of Ventura Projects			
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 Tax Assessor's Parcel 149-0-041-185 and Tax Assessor's Parcel 149-0-041-205; and (3) approval of a Conditional Certificate of Compliance to create a legal lot for Tax Assessor's Parcel 149-0-041-185 that complies with the Subdivision Map Act and Ventura County Subdivision Ordinance	Pending
PL15-0195	Conditional Use Permit (CUP)	Conditional Use Permit for an existing Assembly Use located in the Rural Exclusive-20,000 sq. ft 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 (APN145-0-153-030). The Assembly Use includes 1,910 sq. ft. Assembly Hall/Chapel, a 1,218 sq. ft. Community Center, and a 1,502 sq. ft. parsonage (Single-family dwelling unit). The site is also developed with 42 accessory parking space. Water is provided by the Vineyard Avenue Water Company and sewer service is provided by the County Community Service District.	Pending
PL16-0017	CUP	Conditional Use Permit for Strickland Mutual Water Company (SMWC). 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-	Approved

Permit No.	Permit Type	Description	Status
		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 (A) replace a water supply well currently idled by drought, and (B) bring the existing system into compliance with Ventura County Water Works Manual (VCWWM).	
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 Blvd., Oxnard. A conditional use permit authorizing a caretaker dwelling for the contractor's service and storage yard. During the initial phase of the project the applicant will install landscaping and screening in order to abate violations and continue to operate the contractor service and storage yard. Once adequate water service is made available by the Garden Acres Water Mutual Company, the proposal includes constructing a 3,000 sq. ft. warehouse with an internal restroom, and removal of the various storage sheds.	Pending
PL17-0049	CUP	Conditional Use Permit for an existing 80-foot tall communications facility and associated equipment. The original Conditional Use Permit (CUP) 4912 expired. The stealth facility is designed as a faux pine tree. No physical improvements are proposed.	Pending
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 E Ventura Blvd in El Rio	Pending
PL17-0108	Minor Mod.	Modification of Conditional Use Permit (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
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
PL18-0011	Lot Line Adjustment (LLA)	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) will increase in size from 1.21 acres to 1.44 acres, this lot is zoned OS-160 ac. Parcel B will	Pending

Permit No.	Permit Type	Description	Status
		decrease in size from 76.35 acres to 76.12 acres, this parcel is zoned AE-40 AC.	
PL18-0029	CUP	Conditional Use Permit 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. The	Pending
PL18-0041	Minor Mod.	Minor Modification to Conditional Use Permit (CUP) No. 5020-1 to authorize a ten year time extension of an existing wireless communications facility (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' X 22' fenced enclosure and open equipment cabinets within another fenced enclosure accommodating 2 separate carriers. The enclosures include batteries and a generator.	Pending
PL18-0057	Minor Mod.	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, though the antennas are visible.	Pending
PL18-0068	CUP	The applicant requests a Conditional Use Permit (Case No. PL18-0068) to authorize a minor expansion to an existing two-story drive through mini-storage facility by adding an 32,715 sq. ft. interior third-story to the shell of the existing warehouse building (Building "A"), construction of a new two-story multi-use building (Building "B") 4,640-sq. ft., 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
PL18-0138	Minor Mod.	Minor Modification to authorize the continued use of a contractor service and storage yard at 11032 Nardo Street in Saticoy. This permit re-instates 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 will continue to be provided by the United Water Conservation District.	Approved
PL18-0139	Minor Mod.	Modification to remove the expiration date of November 6th, 2018 for Case No. PD1943, an RV storage facility with an office, addressed as 1028 Mission Rock Road, Santa Paula.	Pending

Permit No.	Permit Type	Description	Status
PL19-0002	CUP	<p>Conditional Use Permit for an existing plant research and development facility that consists of :</p> <ul style="list-style-type: none"> • 1,685 sq. ft. of unenclosed covered canopy; • 125,881 sq. ft. of greenhouses; • 24,450 sq. ft. of warehouse/storage buildings; • the removal of 8,034 sq. ft. of greenhouse structures; • the removal of 15,291 sq. ft. of office space; • the construction of 7,729 sq. ft. new office/administration space; • the removal of 11,413 sq. ft. of miscellaneous accessory structures; • the construction of 10,695 facilities/operations building; • the construction of a 144 sq. ft. entry; • the construction of a 1,920 sq. ft. shop building; • the construction of a 3,720 sq. ft. seed storage building; • the construction of an 1,800 sq. ft. pump house; and • the construction of a new employee lunch area. • Water to the site is provided by the City of Santa Paula and wastewater is provided by an onsite septic system 	Pending
PL19-0006	Merger	The applicant requests a modification of a Conditional Use Permit be granted to authorize the continued use of a 1,190-sq.-ft. caretaker dwelling and 610-sq.-ft. office associated with an existing, permitted self-storage facility. The storage facility is authorized under PD 1163.	Approved
PL19-0014	Merger	Parcel map waiver lot line merger between two legal lots referenced in Tax Assessor's parcel numbers 145-0-012-100 and 145-0-012-110. Parcel #1 (145-0-012-100) is a legal lot granted by deed measuring at .30 acres (13,300 sq. ft.), 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 sq. ft.) with a General Plan land use designation existing community (El Rio/Del Norte) and zoned RE-10,000 sf.. These lots will merge to form one contiguous 1.4 acre lot, addressed as 269 Walnut Ave, Oxnard.	Pending
PL19-0027	LLA	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 P113-0165 (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

Permit No.	Permit Type	Description	Status
PL19-0033	PAJ	Permit Adjustment to CUP No. 4735-2 to authorize the re-configuration of approved Phase 1B of the Todd Road Jail facility. The proposal involves the relocation of approximately one-half of the approved 149,762 square-foot inmate housing building from the eastern side of the existing jail facility to the western side of the facility.	Pending
PL19-0034	PAJ	Permit Adjustment to CUP Case 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
PL19-0036	PAJ	Permit Adjustment to CUP Case No. LU2932 for modifications to Wishtoyo Clubhouse, commonly known as the Mountain View Golf Course, addressed as 16799 South Mountain View Road. Facility improvements include enclosing an existing 520 sq. ft. 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 Open Space and is zoned Open Space 80 acres.	Pending
PL19-0039	PAJ	Request for modification of existing CUP Case No. 4858 (and Minor Modification No. PL14-0040) to decommission and abandon Water Well site no. 5, 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.	Pending
PL19-0060	LLA	LCA Contract application and Lot Line Adjustment between APNs 109-0-042-080 and 109-0-042-090.	Pending
PL19-0062	Minor Modification	Minor Modification to CUP Case No. 4535 for the ongoing operation of an 80 ft tall wireless communication tower owned by American Tower known as Site No. 301077.	Pending
Projects within the City of Ventura			
PROJ-8150	Residential	17 Single Family Homes, 1 Duplex	Pending
PROJ-6811	Mixed Use	306 Apartment Units, 5,000 sq. ft. Commercial, 5,000 sq. ft. Clubhouse	Approved
PROJ-6270	Residential	117 Single Family Homes, 31 Affordable for sale Triple/Quadplex, 50 Apartment Units	Approved
PROJ-8446	Residential	131 Single Family Homes, 34 Town Home Units, 2 Parks, 3 Miniparks.	Approved

Permit No.	Permit Type	Description	Status
PROJ-4154	Residential	50 Apartment Units (Low Income)	Approved
PROJ-7166	Mixed Use	Mixed Use: 43 Apartment Units, 2 Live/Work Units, 2100 sq. ft. Commercial/Retail	Approved
PROJ-03829	Residential	216 Single Family Homes; 110 Town Home Units	Approved
PROJ-8427	Residential	78 Apartment Units	Approved
PROJ-13226	Commercial	1,162 sq. ft. Car Wash and Existing Food Mart Building Remodel	Pending
PROJ-8428	Mixed Use	Mixed Use: 43 Apartment Units, 1200 sq. ft. Retail	Approved
PROJ-4222	Residential	173 Apartment Units	Approved
Projects within the City of Santa Paula			
18-CDP-03	Mixed Use	Convert 2nd floor offices to 6 new apartments in downtown retail building, and, remodel ground floor commercial unit.	Pending
13-CDP-09	Airpark Specific Plan	Twelve new buildings comprising 37 units for airport residential and/or aviation-related businesses.	Approved
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
12-CDP-05	Industrial	Unfinished and incomplete Industrial Park.	Pending
16-CUP-06	Commercial	New 5-Mega Watt (MW) battery storage facility, solar charged, ties into Southern California Edison (SCE) grid. Phase 2 will expand the facility to 20 MW.	Approved
18-CUP-04	Industrial	Remodel of site for construction equipment yard.	Approved
17-CDP-04	Industrial	New heavy equipment storage yard.	Approved
15-CDP-06	Industrial	New 52,000 sq. ft. factory for specialty pipe manufacturing.	Approved
16-CDP-07	Commercial	Banquet hall and event center conversion from existing retail (furniture) store in Central Business District.	Approved
18-CUP-02	Commercial	New hard cider taproom, outdoor patio, & production facility in Central Business District.	Approved
18-DR-09	Commercial	New restaurant.	Pending
18-CDP-04	Commercial	New 30,000 sq. ft. commercial development: 20,000-sq. ft. medical office building, 10,000 sq. ft. educational building, 148-parking spaces.	Approved
18-CDP-01	Commercial	New self-storage facility w/rental office. Increase Floor to Area Ratio from 0.25 to 0.345.	Approved
19-DR-09	Institutional	New classroom building to replace ~60-year old modular ("temporary") classroom facilities.	Pending
19-CI-07 / PC C-5367	Institutional	New 50-foot tall wireless telecommunications facility to support municipal water oversight, operations and management.	Pending

Section B – Initial Study Checklist and Discussion of Responses³

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
RESOURCES:								
1. Air Quality (VCAPCD)								
Will the proposed project:								
a) Exceed any of the thresholds set forth in the air quality assessment guidelines as adopted and periodically updated by the Ventura County Air Pollution Control District (VCAPCD), or be inconsistent with the Air Quality Management Plan?			X				X	
b) Be consistent with the applicable General Plan Goals and Policies for Item 1 of the Initial Study Assessment Guidelines?			X				X	

1. Air Quality (VCAPCD) Impact Discussion:

1a. The project site is currently occupied by a 15-acre, roughly 60,000 ton per year agricultural material composting operation, operated by Agromin. The operation receives and processes green materials/wood wastes collected from surrounding agricultural programs on Limoneira properties, and green material collected by curbside recycling programs in cities within Ventura County. This operation involves open-air processing and composting of green materials. The process involves the initial shredding and screening of material, placement into large open windrows, turning of the windrows with heavy equipment, screening to separate the fine composted materials from the larger material, and curing of the fine composting materials in windrows.

The project applicant, Agromin, currently operates a 9-acre green and agricultural materials compost facility (“Agromin Shoreline”) in the City of Oxnard (APN 231-0-040-165) and unincorporated area of Ventura County (APNs 231-0-080-070, 231-0-080-085, and 231-0-040-315), pursuant to Conditional Use Permit (CUP) 5001-1. The CUP allows Agromin to accept and process approximately 55,000 tons of green material per year. Operations at the Agromin Shoreline facility are proposed to be modified under Major Modification Permit Case No. PL13-0101 which will expand the CUP boundary to

³ The threshold criteria in this Initial Study are derived from the *Ventura County Initial Study Assessment Guidelines* (April 26, 2011). For additional information on the threshold criteria (e.g., definitions of issues and technical terms, and the methodology for analyzing each impact), please see the *Ventura County Initial Study Assessment Guidelines*.

12 acres and extend operations at the site tentatively until operations can commence at the Limoneira site. Current operations at the facility and Current operations at Agromin Shoreline include material receiving and sorting, pre-processing using a grinder and trammel screens, and composting of organics in open windrows. The applicant-provided project description references transferring the Agromin Shoreline to the proposed 70-acre commercial composting facility in Santa Paula. As the existing compost operations at both the project site and Agromin Shoreline will be completely integrated into the proposed project, these operations are considered part of the baseline/existing conditions used to evaluate the proposed project for incremental air quality impacts. Also included in the baseline assumptions are existing landfill emissions using the volume of divertible compositable 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, there is only one waste hauling company taking the organic waste in west county to landfill locations. This diverted offset-method is acceptable and used in certified EIRs across the state⁴, as the nature of the proposed expanded compost project is directly related to mandated requirements to divert organic waste away from landfills (SB 1383, 2016), and because quantifying ozone precursors are a regional air quality issue for the purposes of attaining federal and state ambient ozone air quality standards.

According to the Air Quality, Climate Change Impact and Health Risk Assessment (AQCCIA, Attachment 4) and Dust Control Plan (Attachment 5) prepared by the Applicant’s consultant, ozone precursor pollutants and localized emissions resulting from the operation of the proposed project are estimated to remain below the thresholds of significance identified in the VCAPCD’s Air Quality Assessment Guidelines (AQAG). The report identifies incremental project-related changes for Reactive Organic Compound (ROC) emissions, estimated to be 22 pounds (lbs.)/day and -291 lbs./day Nitrous Oxides (NOx)(Attachment 4). Note, the incremental NOx emissions are less than existing as the proposed off-road equipment used on site will be the cleanest diesel engine available (Tier 4), the amount of equipment is smaller from the consolidation of the existing Santa Paula and Oxnard compost facilities, and less vehicle miles travelled from waste sources to new destination. An emissions summary table is provided below.

Table 1a.-1		
Emission Sources	Regional Ozone Precursors ⁱ	
	ROC (lbs./day)	NOx (lbs./day)
<i>Baseline Operations</i>		
Composting Sources ⁱⁱ	1,176	
Landfill Fugitives ⁱⁱⁱ	296	

⁴ Badlands Landfill Integrated Project, EIR 2017, EA No. 2017-03
 West Contra Costa Sanitary Landfill Bulk Materials Processing Center, EIR 2003, SCH No. 2002102057
 Nursery Product Hawes Composting Facility, EIR 2006, SCH No. 2006051021
 Coachella Valley Compost SW Facility Revision, EIR 2015, SCH No. 2013081021
 Sonoma County Waste Management Compost Facility, EIR 2012, SCH No. 2008122007

Landfill LFGCS ⁱⁱⁱ	26	157
Mobile Sources ^{iv}	12	229
<i>Proposed Operations</i>		
Composting Sources ^v	1,525	
Mobile Sources	7	95
<i>Incremental Operational Emissions</i>		
(Proposed – Baseline)	22	-291
VCAPCD Thresholds	25	25
Exceedance?	No	No

ⁱ All emissions are taken from applicant consultant air quality calculations excel sheet titled “AG01-Emission Calcs_v10- Landfill VOC Using Flared Gas”

ⁱⁱ includes existing stockpile, windrow, and CASP emissions for Santa Paula and Oxnard compost facilities

ⁱⁱⁱ based on landfill gas collection system performance standards and existing organic waste taken to both county landfills

^{iv} includes on-road vehicles and off-road mobile equipment; reduction in mobile emissions due to proposed use of Tier 4 off-road equipment and less vehicle miles travelled from waste sources to Gold Coast Recycling & Transfer Station for sorting and transfer to landfill

^v includes proposed stockpile, windrow, CASP fugitives, and wet building biofilter emissions

Ventura County is currently designated as non-attainment for federal and state ozone standards. In accordance with the Ventura County AQAG (October 2003), Section 5.3 “Calculating Operational Emissions”, for purposes of determining whether the project will have a significant adverse impact on air quality, project-related ROC and nitrogen oxides (NOx) emissions from compost processing equipment that is required to have a Ventura County APCD Permit to Operate are not considered because these emissions are mitigated and enforced through the APCD permitting system (ministerial) and its rules and regulations. The AQCCIA prepared by the Applicant’s consultant included stationary emissions requiring APCD permits for informational purposes but not in the regional significance determination for ozone precursors.

Odors are substances in the air that pose a potential nuisance to nearby land uses. A public nuisance is defined by APCD Rule 51 as “such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or to the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.” As identified in the AQAG guidelines (Table 6-3), composting facilities are prescribed a screening distance of one mile for nearby sensitive land uses. The proposed commercial organic processing facility will handle compositable material feedstock (food and green waste) and active windrow composting which has the potential to impact nearby sensitive receptors (Todd Road Jail is 0.59 miles to the northeast, and onsite sensitive receptors will abut the proposed CUP boundary). Pursuant to the AQAG, “any project that has the potential to create a public nuisance by subjecting members of the public to objectionable odors should be deemed to have a significant odor impact.” Therefore, the proposed expanded compost facility may have a significant odor impact. However, the Applicant is proposing to process all incoming food waste in an enclosed building (i.e. “wet organics building”) that will be equipped with a negative-pressure blower

system to prevent all odors and emissions from escaping the building. The negative-pressure ventilation system will force air pollutants and odors through a biofilter located outside which is proposed to have a 90% control efficiency. The Applicant is also proposing to have a Covered Aerated Static Pile (~~GORE system~~) to compost the processed food waste and green waste mix, which would have a 97% emission control. In addition, the Applicant's consultant prepared an Odor Impact Minimization Plan (OIMP, Attachment 6) in compliance with California Code of Regulations (CCR) Title 14, Section 17863.4 (Compost Material Handling Facilities) and VCAPCD requirements for assessments of odor related project impacts. The plan will be employed during the operational phase of the project and includes the following objectives: monitoring odor of emissions, implementation of processes to eliminate odors, and implementation corrective action procedures to address odor impacts from facility operations. The plan indicates multiple sensitive receptors are located within the one-mile screening distance of the VCAPCD guidelines; the Todd Road Ventura County Jail is approximately 0.59 miles northeast of the CUP boundary and onsite dwelling units adjoin the CUP boundary to the south and east. Impacts related to odor are found to be less than significant with mitigation incorporated into the project design by way of 1) fully enclosing the food waste processing operation, which has the highest odor potential, 2) processing the food and green bulk compost in a CASP with 97% odor control technology, and 3) implementation of the OIMP. The compost facility would also be obtaining an APCD Permit to Operate for the proposed biofilter, AD and CASP emission control equipment to comply with applicable emission reduction rules in addition to compliance with APCD Rules 50 (Opacity), 51 (Nuisance), and 55 (Fugitive Dust). The APCD is proposing to adopt a compost rule, which was included as a proposed emission control measure in the most recent 2016 Air Quality Management Plan (AQMP). Adoption of a compost rule will further reduce criteria pollutant emissions and odors generated at the project site.

Based on information in the project application, 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 since the project roadways, scale house, and admin building lot will be paved with asphalt. The tipping/staging areas are proposed to be paved with cement, and the windrow and feedstock areas will be laid with cement-treated native soil. In addition, full implementation and adherence to the Dust Control Plan (Attachment 5) and APCD Rules 51, Nuisance, and 55, Fugitive Dust (also included in facility's existing CUP and APCD permit conditions) will help minimize fugitive dust prior to creating a nuisance potential.

The Applicant consultant assessed localized exposure of toxic air contaminants (TAC) to nearby sensitive receptors in accordance with the California Air Resources Board (CARB) Hotspots Analysis and Reporting Program (HARP 2). Cumulative cancer risks to residents were calculated with a 30-year exposure period; worker cancer risks were calculated with a 25-year exposure period based on Office of Environmental Health Hazard Assessment (OEHHA) guidelines. Acute and chronic risks were also calculated using the same OEHHA derived method. Based on the information submitted (AQCCIA), there will be less toxic exposure from the proposed project conditions as

compared with the existing operations at the Santa Paula site. This is primarily due to the replacement of older dirtier diesel engine equipment with cleaner Tier 4 diesel equipment, usage of cleaner waste delivery transfer trucks (CNG) and electrification of some of the equipment.

According to the applicant's project description, the proposed project operations for the Agromin Limoneira Facility would increase the total number of full-time employees from 11 to 37; none of the employees will live on site but may potentially live in the Santa Paula Non-Growth Area. The 2016 AQMP population forecasts are interpolated from the Southern California Association of Governments' (SCAG) 2016 Regional Transportation Plan (RTP) for forecast years 2020, 2025, 2030, and 2035. If the 20 employees from the Agromin Shoreline facility transfer to the Limoneira facility, a potential increase of 46 new residents (the net gain of employees from the project plus the transfer from Shoreline) would not negatively contribute to the 2025 population growth forecast for the unincorporated county (104,182 vs. current population of 99,673) and does not conflict or obstruct with implementation of the most recent adopted AQMP (Initial Study Item Checklist C. Air Quality, Item 1).

1b. The proposed project has been evaluated for consistency with the General Plan Air Quality Goals 1.2.1-1 and -2 and Policies 1.2.2.1 through 3 and 5. The proposed project is consistent with General Plan Policy 1.2.2.1 and the requirement to comply with the AQMP. The estimated emissions do not exceed 25 lbs./day or greater for ROC or NO_x, as described in the Air Quality Assessment Guidelines, 2003, Section 5 "Estimating Ozone Precursor Emissions".

Mitigation/Residual Impact(s)

Mitigation Measure AQ MM-1 – Dust Prevention

Purpose: To ensure that fugitive dust and particulate matter that may result from site operations are minimized to the greatest extent feasible.

Requirement: The Permittee shall comply with the provisions of applicable VCAPCD Rules and Regulations, which include but are not limited to, Rule 50 Opacity, Rule 51 Nuisance, and Rule 55 Fugitive Dust. The Permittee shall ensure compliance with the following provisions:

- a. Permittee shall cease all organics processing and compost pile spreading activities during periods of high winds (minimum 25 MPH) to prevent excessive amounts of fugitive dust generated from windrow stockpiles and unpaved roads.
- b. No person shall cause or allow the emissions of fugitive dust from any applicable source such that the dust remains visible beyond the midpoint (width) of a public street or road adjacent to the property line of the emission source or beyond 50 feet from the property line if there is not an adjacent public street or road.

- c. Permittee shall periodically water or treat all unpaved on-site roads with environmentally safe dust suppressants to prevent excessive amounts of dust.
- d. The Permittee shall either operate or ensure that all on-site vehicles travel at speeds not to exceed 15 miles per hour.
- e. Permittee shall control dust from composting stockpiles, windrows and other related materials with the potential to release fugitive dust to minimize dust release.
- f. The Permittee shall minimize the amount of material tracked onto the highway to help control potential associated dust concerns by either a wheel wash and/or a grating system at the entrance of the facility. As vehicles leave the facility, mud and soil shall be either washed and/or vibrated from the wheels prior to leaving the property.
- g. Notwithstanding the 3 available track-out control measures outlined in APCD Rule 55, Section B.3, all track-out shall be removed at the conclusion of each workday or evening shift subject to the same condition regarding PM-10 efficient street sweepers as outlined in Subsection B.3.a.iii. The use of blowers for removal of track-out is expressly prohibited under any circumstances.
- h. Permittee shall maintain in good condition and in proper tuning all composting and spreading equipment engines in accordance with the engine manufacturer's specifications.

Documentation: The Permittee shall submit the Final Dust Control Plan to the Planning Division and the Environmental Health Division Local Enforcement Agency (LEA) for review and approval. The plan shall comply with identified VCAPCD Rules and Regulations.

Timing: Prior to the issuance of the Zoning Clearance for construction, the Permittee shall submit the Final Dust Control Plan for review and approval. All protocols in the approved Final Dust Control Plan shall be implemented by the Permittee for the life of the Project.

Reporting and Monitoring: The Planning Division and the LEA will maintain copies of all documentation and reporting related to the approval of the Final Dust Control Plan. The APCD shall also have access to and review the document for compliance with Rules 50, 51 and 55 prior to approval. Monitoring and Enforcement of dust-related provisions for project shall be conducted by APCD staff during compliance inspections and on a complaint-basis.

Mitigation Measure AQ MM-2 – Nuisance

Purpose: To ensure that the facility operates in accordance with the Rules and Regulations of the Ventura County Air Pollution Control District, with emphasis on Rule 51, Nuisance.

Requirement: Facility shall be operated in accordance with the Rules and Regulations of the Ventura County Air Pollution Control District, with emphasis on Rule 51, *Nuisance*. The Permittee shall ensure compliance with the following provision:

- a. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endangers the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.

Documentation: The Permittee shall prepare and submit a Final Odor Impact Minimization Plan (OIMP) to the Planning Division and the Environmental Health Division Local Enforcement Agency (LEA) for review and approval. The plan shall be in compliance with applicable state and local requirements to minimize operational odors from migrating offsite and creating a public nuisance.

Timing: Prior to the issuance of a Zoning Clearance for Construction, the Permittee shall submit the Final OIMP for review and approval. The Final OIMP shall be reviewed annually and updated as necessary to reflect any changes in the design or operation of this site, including but not limited to any change in the methods of storing feedstock, type(s) of equipment, site layout, and odor control measures. Modifications to the OIMP shall be submitted to the Planning Division and LEA before any changes are implemented at the site. All protocols in the approved Final OIMP shall be implemented by the Permittee for the life of the Project.

Reporting and Monitoring: The Planning Division and LEA will maintain copies of all documentation and reporting related to the implementation of the OIMP. The Planning Division and LEA has the authority to inspect the site to confirm the OIMP has been implemented consistent with the requirements of Ventura County Ordinance Code §4719. Monitoring and Enforcement of composting-generated odors is done by the LEA, as APCD does not have regulatory authority over composting odors (H&SC §41700) although other air contaminants may be called in as complaints to APCD and inspectors will be dispatched accordingly.

Mitigation Measure AQ MM-3 – Permits Required

Purpose: To ensure that project operations shall be conducted in compliance with all applicable VCAPCD Rules and Regulations, in particular Rule 10, (Permits Required) certain types of new and modified equipment and operations require APCD permits prior to installation.

Requirement: The Permittee shall obtain an Authority to Construct prior to installation and a Permit to Operate prior to operation. All APCD Permitting requirements shall be satisfied prior to any operations commencing onsite. To contact APCD Permitting, please call at the Engineering Division at 805-645-1401 or by email at engineering@vcapcd.org.

Documentation: An approved Authority to Construct and an approved Permit to Operate from APCD.

Timing: The Permittee shall submit the appropriate applications and supporting documentation to APCD for review and approval prior to a Zoning Clearance for construction. The Permittee shall provide the Planning Division these APCD permits, or written confirmation from APCD that the permits are not needed, prior to the issuance of a Zoning Clearance for use inauguration and/or installation.

Monitoring and Reporting: A copy of the approved Authority to Construct and Permit to Operate shall be maintained as part of the project file. Ongoing compliance with the requirements of the Permit to Operate shall be accomplished through field inspection by APCD Inspectors.

Residual Impacts:

Following the implementation of Mitigation Measures AQ MM-1, AQ MM-2, and AQ MM-3, impacts to air quality will be less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
2A. Water Resources – Groundwater Quantity (WPD)								
Will the proposed project:								
1) 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?		X				X		
2) In groundwater basins that are not overdrafted, or are not in hydrologic continuity with an overdrafted basin, result in net groundwater extraction that will individually or cumulatively cause overdrafted basin(s)?		X				X		
3) In areas where the groundwater basin and/or hydrologic unit condition is not well known or documented and there is evidence of overdraft based upon declining water levels in a well or wells, propose any net increase in groundwater extraction from that groundwater basin and/or hydrologic unit?	X				X			
4) Regardless of items 1-3 above, result in 1.0 acre-feet, or less, of net annual increase in groundwater extraction?		X				X		
5) Be consistent with the applicable General Plan Goals and Policies for Item 2A of the Initial Study Assessment Guidelines?		X				X		

2A. Water Resources – Groundwater Quantity (WPD) Impact Discussion:

2A-1. The proposed project will convert an existing 15-acre composting facility and a 55-acre lemon orchard to a 70-acre commercial organics processing operation. Water use by the existing composting operation is not known. The 55-acre lemon orchard is estimated to use 2.75 AFY for a total of 151 AFY. Domestic water demand is estimated at 48 AFY.

Water for the proposed project will be supplied by the City of Santa Paula (Attachment 7) from wells pumping in the Santa Paula Basin. The Santa Paula Basin is in hydrologic connection with the Oxnard Subbasin, designated Critically Overdrafted by the California Department of Water Resources.

The proposed operation will remove the orchard and render the site area impermeable. Irrigation return flows from agriculture are an important source of recharge. According to the Facility Water Balance Study (Attachment 8), “an efficient orchard irrigation system should not create excessive runoff either as surface flow or groundwater percolation.” However, the study does not provide information regarding the loss of recharge and precipitation due to reduction of permeability of the 55 acre orchard area. According to a 2010 study conducted by the Irrigation Training and Research Center for the Fox Canyon Groundwater Management Agency (FCGMA), citrus in the area has an adjusted leaching requirement of 16%. Therefore, the net irrigation impact by the existing basin is approximately 127 AFY. Similarly, a 2017 study by Daniel B. Stephens & Associates for FCGMA found that 10% of precipitation infiltrated for deep percolation/infiltration of precipitation nearest the project site.

The proposed operation will capture and store rainwater to supplement composting operational water needs. With rainwater capture and storage, the proposed project would result in a net reduction in groundwater use, estimated at 60 AF less than the current orchard use in normal precipitation years, 76 AF less in wet years, with a net increase of 2 AF 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 and is considered less than significant for groundwater quantity.

2A-2. The proposed project overlies the Santa Paula Basin, which is in hydrologic connection with the Oxnard Subbasin, designated Critically Overdrafted by the California Department of Water Resources. However, the proposed project will result in a net decrease in groundwater use from the present use with the conversion of land use from agricultural to commercial. The proposed project would not result in net groundwater extraction that would individually or cumulatively cause an overdrafted basin and is therefore considered less than significant for groundwater quantity

2A-3. This item does not apply to the project. The project site overlies the Santa Paula groundwater basin which is a well-known and documented groundwater basin.

2A-4. The proposed project will not result in an increase of 1.0-acre feet or more of net groundwater extraction.

2A-5. The proposed project will be consistent with the applicable General Plan Goals and Policies for Item 2A of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): Potential impacts on groundwater extraction will be less-than-significant. No mitigation is required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
2B. Water Resources - Groundwater Quality (WPD)								
Will the proposed project:								
1) Individually or cumulatively degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the Basin Plan?		X				X		
2) Cause the quality of groundwater to fail to meet the groundwater quality objectives set by the Basin Plan?		X				X		
3) Propose the use of groundwater in any capacity and be located within two miles of the boundary of a former or current test site for rocket engines?	X				X			
4) Be consistent with the applicable General Plan Goals and Policies for Item 2B of the Initial Study Assessment Guidelines?		X				X		

2B. Water Resources - Groundwater Quality (WPD) Impact Discussion:

2B-1. and 2B-2. The historically most shallow depth of groundwater as 15 feet below the ground surface applicant provided Geotechnical Report (Attachment 9, Earth Systems, December 2017) identifies the. Potential project groundwater quality impacts would be associated with discharges from the proposed septic systems and discharges from composting operations. The Applicant’s consultant submitted a Containment Area for Compost Processing Operations Plan (Attachment 10) which outlines the best practices and controls for stormwater management. The proposed project consists of both aerobic and anaerobic composting operations. Leachate from composting operations can contaminate groundwater if allowed to percolate into soil. The project will be designed with all process and working surfaces paved or underlain with engineered low permeability soils with hydraulic conductivity <10 5 cm/s in accordance with State Water Resources Control Board Order WQ 2015 0121 DWQ General Waste Discharge Requirements for Composting Operations. Stormwater retention ponds will be designed with liners with a hydraulic conductivity of <10 6 cm/s. Anaerobic digester sumps will be constructed of precast concrete inside a polyethylene geomembrane liner. Proposed anaerobic digesters will include subsurface sumps to collect percolate. Construction in accordance with these requirements and Standard Condition No. 172 Containment Area

for Compost Processing Operations, will mitigate potential leaching to groundwater to less than significant.

The proposed project includes installation of multiple on-site wastewater treatment systems (OWTS) septic systems. The OWTS will be permitted by the County of Ventura Environmental Health Division and regulated by the State Water Resources Control Board. Septic systems have the potential to contaminate groundwater if not properly installed or maintained. Properly installed and maintained OWTS will reduce the groundwater contamination potential to less than significant and not cause groundwater to exceed groundwater quality objectives set by the Basin Plan.

The proposed project will not cause the quality of groundwater to fail to meet the groundwater quality objectives set by the Basin Plan because the project liquid effluent is disposed of through a County Environmental Health Department approved onsite septic system. Such systems have adequate separation from adjacent properties and nearby systems and are constructed with adequate clearances from historical high groundwater levels so as not to create any cumulative effects upon local groundwater supplies.

The proposed project includes the storage of hazardous materials, vehicle maintenance, and installation of an emergency generator. Standard Conditions of approval:

- Vehicle and Equipment Maintenance Area
- Containment Area for Hazardous Materials; and
- Diesel Fuel Tank Area are required.

2B-3. The project does not propose the use of groundwater within two miles of the boundary of a former or current test site for rocket engines and is considered to have no impact.

2B-4. The proposed project will be consistent with the applicable General Plan Goals and Policies for Item 2B of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): Potentially significant impacts on groundwater quality are mitigated with implementation of a containment plan (required as a standard condition of approval) and compliance with the Waste Discharge Requirements enforced by the RWQCB. No mitigation is required. Residual impacts on groundwater quality will be less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
2C. Water Resources - Surface Water Quantity (WPD)								
Will the proposed project:								
1) Increase surface water consumptive use (demand), either individually or cumulatively, in a fully appropriated stream reach as designated by SWRCB or where unappropriated surface water is unavailable?	X				X			
2) Increase surface water consumptive use (demand) including but not limited to diversion or dewatering downstream reaches, either individually or cumulatively, resulting in an adverse impact to one or more of the beneficial uses listed in the Basin Plan?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 2C of the Initial Study Assessment Guidelines?		X				X		

2C. Water Resources - Surface Water Quantity (WPD) Impact Discussion:

2C-1 and 2C 2. Surface water is not proposed to be used for the project. Water for the project will be supplied by the City Santa Paula. According to the City of Santa Paula 2018 General Urban Water Management Plan, the City currently utilizes groundwater exclusively from five municipal wells within the Santa Paula Groundwater Basin. The project is considered to have no impact on surface water quantity.

2C-3. The proposed project will be consistent with the applicable General Plan Goals and Policies for Item 2C of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s): The proposed project will not require surface water supplies to be diverted or dewatered. Potential impacts on surface water consumption will be less-than-significant. No mitigation is required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
2D. Water Resources - Surface Water Quality (WPD)								
Will the proposed project:								
1) Individually or cumulatively degrade the quality of surface water causing it to exceed water quality objectives as contained in Chapter 3 of the three Basin Plans?			X				X	
2) Directly or indirectly cause storm water quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 2D of the Initial Study Assessment Guidelines?		X				X		

2D. Water Resources - Surface Water Quality (WPD) Impact Discussion:

2D-1. The proposed project is addressed as 13290 W Telegraph Road (APN 090-0-180-085) and is located outside the County unincorporated urban area. The Todd Barranca and Ellsworth Barranca, tributaries to the Santa Clara River (SCR), flow along the east and west property boundaries accordingly. The southern boundary of the property is less than 200 feet away from the SCR Reach 3. The SCR has documented water quality impairments and effective Total Maximum Daily Loads (TMDLs) to address these impairments including bacteria and chloride TMDLs. Water quality at Reach 3 is documented on Clean Water Act 303(d) list for chloride, bacteria, total dissolved solids and toxicity.

The proposed development will disturb over 70 acres, replacing existing lemon orchards with approximately 50 acres of impervious surface dedicated to building footprints, driveways, water tanks, concrete pads, and impervious area for compost storage and processing.

Runoff pollution from the proposed impervious surfaces has the potential to contribute to the exceedances of water quality objectives in downstream waterbodies. Increased new development and urbanization is typically addressed through the Part 4.E., "Planning and Land Development Program" of the Ventura Countywide NPDES Municipal Stormwater Permit No. CAS004002, but the proposed project located outside urban Existing Community area, is not subject to these requirements. Overall, the

proposed development and increased impervious surface area 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 and is expected to have a Potentially Significant Impact (PSM) on surface water quality objectives. Incorporation of the mitigation measure CSWP MM-1 – Post-Construction Best Management Practices (below), will ensure individual and cumulative impacts to existing impaired downstream waterbodies and water quality objectives will be avoided.

2D-2. The proposed project is addressed as 13290 W Telegraph Road (APN 090 0 180 085) in the Santa Clara River watershed and located outside the County unincorporated urban area. The Conditional Use Permit is for construction of a large-scale Commercial Organics Processing Operation (Composting) facility. The proposed development will replace existing lemon orchards, will disturb over 70 acres, replacing existing lemon orchards with approximately 50 acres of impervious surface dedicated to building footprints, driveways, water tanks, concrete pads, and impervious area for compost storage and processing. In accordance with the Ventura Countywide Municipal Stormwater NPDES Permit CAS004002, “Development Construction Program” Subpart 4.F, the Permittee will be required to include Best Management Practices (BMPs) designed to ensure compliance and implementation of an effective combination of erosion and sediment control measures for a disturbed site greater than 5 acres to protect surface water quality during construction (Table 8 in Subpart 4.F). The proposed construction activities are also subject to coverage under the NPDES General Construction Permit (No. CAS000002). Additionally, once constructed, the proposed project will be subject to compliance with the State Water Resources Control Board Order WQ 2015 0121 DWQ, General Waste Discharge Requirements for Composting Operations.

As such, neither the individual project nor the cumulative threshold for significance would be exceeded and the project is expected to have a Less than Significant (LS) impact related to water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits.

2D-3. Mitigation measure Mitigation Measure CSWP MM-1 – Post-Construction Best Management Practices, and standard conditions assigned to the proposed project will ensure that the proposed project is consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 2D of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

Mitigation Measure CSWP MM-1 – Post-Construction Best Management Practices

Purpose: To ensure runoff from new impervious surfaces does not contribute pollutants or degrade water quality of downstream surface waters resulting in further exceedances of water quality objectives contained in the Los Angeles Region Basin Plan.

Requirement: The Permittee shall include post construction stormwater best management practices (BMPs) to retain/treat the new impervious surface runoff, a Maintenance Plan and annual verification of ongoing maintenance.

Documentation: The Permittee shall submit the following items to the Watershed Protection District – County Stormwater Program Section (CSWP) for review and approval:

- a. A complete site plan prepared and stamped by a California licensed civil engineer or land surveyor that accurately delineates the location of the proposed development, existing and proposed impervious surfaces, storm drain system elements, general drainage patterns, and proposed site specific Post Construction Stormwater Management Plan (PCSMP). A drawing detail prepared and stamped by a California licensed civil engineer or architect verifying that the installation of the PCSMP will meet performance criteria defined in Section III of the Part 4.E of the Permit and the 2011 Technical Guidance Manual (TGM), to the maximum extent practicable.
- b. Maintenance Plan (Exhibit “C” of the County’s “Covenant for Maintenance of Post Construction Stormwater Management Control System” form available at <http://onestoppermit.ventura.org>) for the detention basins shall be prepared in accordance with Section 7 and Appendix I of the TGM. The plan shall include but not limited to the following:
 - 1) the location of each device;
 - 2) the maintenance processes and procedures necessary to provide for continued operation and optimum performance;
 - 3) a timeline for all maintenance activities; and
 - 4) any technical information that may be applicable to ensure the proper functionality of this device.
- c. Maintenance Agreement (County’s “Covenant for Maintenance of Post Construction Stormwater Management Control System” form is available at <http://onestoppermit.ventura.org>) signed by the Property Owner including a signed statement accepting responsibility for maintenance of the detention basins. The statement must include written verification that the detention basins will be properly maintained. At a minimum, this statement shall include the following:
 - 1) written conditions in the sales or lease agreement, which require the Property Owner or tenant to assume responsibility for PCSMP maintenance and annual maintenance inspection;
 - 2) written text in project covenants, or
 - 3) any other legally enforceable agreement or mechanism that assigns PCSMP maintenance responsibility.

- d. Completed and signed Annual Maintenance Verification Report (Exhibit “D” of the County’s “Covenant for Maintenance of Post Construction Stormwater Management Control System” form available under the County Stormwater Program Section tab at <http://onestoppermit.ventura.org>).

Timing: The above listed items (a, b and c) shall be submitted to the CSWP for review and approval prior to Zoning Clearance for Construction. In addition, the Annual Maintenance Verification Report (d) shall be submitted to CSWP annually prior to September 15th after signing off for occupancy and issuing the Certificate of Occupancy.

Monitoring and Reporting: CSWP staff will review the submitted materials to ensure the project does not contribute to exceedances of water quality objectives in downstream receiving waters. Maintenance Plan shall be kept on site for periodic review by CSWP staff.

Residual Impacts:

Following the implementation of Mitigation Measure CSWP MM-1, impacts to surface water quality objectives will be less than significant.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
3A. Mineral Resources – Aggregate (PInG.)								
Will the proposed project:								
1) Be located on or immediately adjacent to land zoned Mineral Resource Protection (MRP) overlay zone, or adjacent to a principal access road for a site that is the subject of an existing aggregate Conditional Use Permit (CUP), and have the potential to hamper or preclude extraction of or access to the aggregate resources?	X				X			
2) Have a cumulative impact on aggregate resources if, when considered with other pending and recently approved projects in the area, the project hampers or precludes extraction or access to identified resources?					X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 3A of the Initial Study Assessment Guidelines?	X				X			

3A. Mineral Resources – Aggregate (PInG.) Impact Discussion:

3A-1. through 3A-3. The CUP boundary is not within the MRZ-2 Overlay; however, the subject property is located adjacent to MRZ-2 zoned lands, and adjacent to lands that may possess land use approvals for mining activities (CUP-1524 EUA#7). A review of available records indicates that no active surface mining is presently occurring within the vicinity of the project. The project site is also not located adjacent to a principal access road for a site that is subject to an existing aggregate CUP. The proposed project will not create a project-specific impact or create a cumulatively considerable contribution to a cumulative impact and will not hamper or preclude extraction or access to identified aggregate resources. The proposed project was evaluated for cumulative impacts for pending and recently approved projects in the area and was determined was not determined to create a cumulatively considerable impact related to the extraction or access to aggregate resources. The proposed project was determined to comply with the applicable *Ventura County General Plan* Goals 1.4.1 1 through 3 and Policies 1.4.2 6 through 8.

The project is consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 3A of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

Because no significant impacts on mineral resources have been identified, no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
3B. Mineral Resources – Petroleum (PIng.)								
Will the proposed project:								
1) Be located on or immediately adjacent to any known petroleum resource area, or adjacent to a principal access road for a site that is the subject of an existing petroleum CUP, and have the potential to hamper or preclude access to petroleum resources?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 3B of the Initial Study Assessment Guidelines?		X				X		

3B. Mineral Resources – Petroleum (PIng.) Impact Discussion:

3B-1. The subject property and proposed CUP boundary are located within the boundary of the Saticoy Oil Field and adjacent to multiple land use permits allowing petroleum extraction (CUP 308; CUP 462; CUP 2810). An existing oil production well (Vintage Projection California, LLC Saticoy Field Edwards 28) and an idle oilfield injection well (Vintage Production California, LLC Edwards 27) are located near the center of the current permit boundary of the existing Agricultural Material Composting Operation (432 feet southeast of the existing facility entrance). The proposed project will support access to the wells by the oil company as required by DOGGR. Additionally, the proposed project will not preclude physical access to the Saticoy Oil Field. Impacts related to the construction and operation of proposed project will remain less than significant with respect to Mineral Resources.

3B-2. The project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 3B of the Ventura County Initial Study Assessment Guidelines.*

Mitigation/Residual Impact(s)

Based on the discussion above, no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
4. Biological Resources								
4A. Species								
Will the proposed project, directly or indirectly:								
1) Impact one or more plant species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?		X				X		
2) Impact one or more animal species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?			X			X		

4A. Species Impact Discussion:

4A-1. The Ventura County General Plan (December 13, 2016), Biological Resources Policy 1.5.2.1, requires an evaluation by a qualified biologist to assess the potential adverse impacts and, if necessary, the development of mitigation measures for discretionary development that has the potential to adversely affect biological resources. In addition, Biological Resources Policy 1.5.2.2 requires discretionary development to be sited and designed to incorporate all feasible measures to mitigate significant impacts to biological resources. Discretionary actions undertaken by public agencies are required to demonstrate compliance with the California Environmental Quality Act (CEQA).

Biological assessment surveys were conducted at the project site by Biologists Stephen Jones and Matt Schaap, BioResource Consultants, Inc (BRC), a Ventura County Qualified Biology Consulting firm; on July 15, 2014, July 23, 2014, July 30, 2014, December 3, 2015. The biological surveys characterized and mapped the vegetation, assessed the habitat suitability for potential special-status species and wildlife movement, mapped special-status biological resources, conducted a “waters or wetlands delineation and determination”; and recorded observations of plant and wildlife species on the project site (Survey Area).

Information gathered from the surveys supported the preparation of an Initial Study Biological Assessment (ISBA), prepared in accordance with the Ventura County Planning Division’s *Standards for Initial Study Biological Assessments* and pursuant to CEQA Section 15064 (Determining Significant Impacts). The biological resources that occurred at the project site at the time of the surveys and survey results are

documented in the Initial Study Biological Assessment (ISBA) report, prepared by BRC (BRC, 2016) (Attachment 11).

The Survey Area predominantly consists of an existing agricultural compost operations facility and its associated structures, with the remaining area of the parcel characterized as active agricultural (Site and Survey Map, ISBA, Attachment 11). The vegetation with the Survey Area is dominated by non-native agricultural crops and non-native weedy plant species. An unnamed ephemeral drainage (agricultural ditch) transverse the central portion of the parcel (located approximately 120 feet east of the existing driveway) and drains south from the tracks of the Southern Pacific Railroad towards Roger Road, an unnamed dirt road, located outside (south) of the Survey Area (denoted as “W-1” on Wetlands and Waters Map, Attachment 11). The drainage ditch continues southwest to the Santa Clara River, which is located approximately ½ mile from the proposed CUP boundary. Along the proposed eastern boundary of the proposed CUP, there is a concrete lined trapezoidal drainage channel. A windrow of eucalyptus or “Redgum” trees (*Eucalyptus camaldulensis*), lines the western bank of the VCWPD channel (Plant Communities Map, Attachment 11).

Table 4A-1, below provides the percent of various cover types occurring within the Survey Area

Table 4A-1 – Vegetation Cover	
Cover Type	Amount of Cover (percentage)
Native vegetation	5
Non-native vegetation	65
Bare Ground/Graded/Developed/Roads	25

No locally important or rare plant communities were found within the Survey Area. The following are the major plant community types occurring on the parcel:

Agricultural Compost is dominated by bare ground and large compost piles. The area lacks the presence of native plant assemblages. Weedy species occur sporadically through the habitat and include storksbill (*Erodium cicutarium*), pineapple weed (*Chamomilla suaveolens*) and ragweed (*Ambrosia psilostachya*).

Agricultural is dominated by lemon and orange crop trees and strawberries. The habitat lacks a presence of native plant assemblages. Weedy species occur sporadically and include storksbill, ragweed, and horehound (*Marrubium vulgare*).

Cleared Areas are roads, pads and other improved areas or areas void of any vegetation. The cleared areas lack non-native plant assemblages and are dominated by bare ground with occurrences of weedy species including storksbill, pineapple weed, horehound and ragweed.

Agricultural Ditch is an ephemeral drainage ditch that drains Survey Area 1; it transverses the site from north to south and is located 120 feet east of the existing

facility driveway. The ditch is dominated by weedy species including ragweed and horehound, with occurrences of mulefat (*Baccharis salicifolia*) and white sweet clover (*Melilotus albus*).

The Plant Communities Table in Attachment 11 provides an estimate of potential impacts to these communities from proposed project development, no locally important or rare plant communities were found within the Survey Areas.

The dominant land use on the parcel is agriculture. The land has been historically cultivated and as such, dominant plant community within the parcel is agricultural crops or ruderal (non-native plants adapted to disturbed conditions), including row crops with occurrences of non-native weedy species. Because of the developed nature of the project site, there are no natural areas occurring that provides a suitable habitat for special-status plant species to occur. Therefore, project development is not likely to impact one or more plant species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity.

4A-2. BRC conducted a query of California Natural Diversity Database RareFind Version 8.1.0 (CNDDDB) for the USGS *Saticoy, Santa Paula, Ventura* and *Oxnard* 7.5-minute topographic quadrangles with a target search within a 5-mile radius of the parcel. Potential special-status wildlife species that could potentially occur in the search radius are provided in the "Observed and Potentially Occurring Special-status Species" table in Attachment 11. Site surveys did not detect any special-status wildlife species. However, suitable habitat is present within the parcel for monarch butterfly (*Danaus plexippus*), coast horned lizard (*Phrynosoma blainvillii*), and silvery legless lizard (*Anniella pulchra pulchra*). In addition, suitable habitat for nesting birds also occur on the parcel. These species are discussed further below:

Monarch butterfly: The monarch butterfly occurs globally, and as a species, the global population is considered somewhat stable however the population of subspecies that inhabits North America, *Danaus plexippus plexippus*, is imperiled (NatureServe & Xerces Society, 2015)⁵. The decline includes the two main populations in North America, the larger eastern population and the smaller western population. The California Department of Fish and Wildlife (CDFW) also recognizes this species as "S3" meaning, that it is vulnerable to extirpation or extinction sub nationally (meaning, within the State). The stand of Eucalyptus trees lining the western bank of the concrete lined trapezoidal drainage channel provide marginal roosting habitat for the butterflies. Monarch butterflies have not been documented as roosting on the site. Breeding sites are associated with Eucalyptus stands along the coast. Current project plans do not entail the removal or trimming of the eucalyptus. However, if these trees are to be removed or trimmed in the future and if monarch butterflies are roosting on these trees, the loss of these trees could be considered potentially a significant impact. Therefore, Mitigation Measure (MM) BIO-1 is proposed, which requires pre-construction surveys be

⁵ Conservation Status and Ecology of the Monarch Butterfly in the United States. Prepared for the U.S. Forest Service, prepared by: The Xerces Society for Invertebrate Conservation. March 2015

conducted and monitoring of the construction activities during the roosting season, for these butterflies.

Coast horned lizard: This species is recognized as “ST” (State Threatened) by the State of California and as “SSC” (Species of Special Concern), by the CDFW. On the project site, potentially suitable coast horned lizard habitat is present within the existing citrus orchards located on the eastern and southern portion of the Survey Area within PC-2 Agriculture (See Plant Communities Map, Attachment 11). These areas have loose-textured soils that are typical of horned lizard habitat. The composting area and the new citrus orchard located on the western portion of the parcel have highly compacted soils. It is highly unlikely that coast horned lizards would be found in these areas. However, there still is a low potential for their occurrence. Expansion of composting operations into areas of suitable habitat of this species on the parcel and other activities associated with the composting operations, such as grading, human and vehicular activity could all result in mortality of these species. This impact is significant. Therefore, MM BIO-2 is proposed, which requires pre-construction surveys and relocation of these lizards, if found within the proposed CUP area.

Silvery Legless Lizard: This reptile species is recognized as a Species of Special Concern (SSC) by the CDFW. Within the Survey Area, suitable habitat for legless lizard may be present within the existing citrus orchards located on the eastern and southern portion of the parcel, within PC-2 Agriculture (Plant Communities Map, Attachment 11). These areas have a well-defined leaf layer and loose-textured soils that allow for legless lizard movement and foraging. The soils in the existing agriculture composting operation area and the newly planted citrus orchard located on the western portion of the parcel are highly compacted and lacks a leaf layer, making it an unsuitable habitat for legless lizards. It is highly unlikely that legless lizards would be found in either area. However, there still is a low potential for their occurrence. Expansion of composting operations into areas of suitable habitat of this species within the Survey Area and other activities associated with the composting operations, such as grading, human and vehicular activity could all result in mortality of these species. This impact is considered potentially significant. Therefore, MM BIO-2 is proposed, which entails pre-construction surveys and relocation of these lizards, if found within CUP boundary.

Nesting Birds: The Federal Migratory Bird Treaty Act (MBTA) and the CDFW Code (3503, 3503.5, 3511, 3513 and 3800) protect most native birds. In addition, the federal and state endangered species acts protect some bird species listed as threatened or endangered. No special-status bird species were detected during the site surveys. However, the agricultural crops and the row of eucalyptus trees on eastern edge of the proposed CUP boundary provide suitable roosting and nesting habitat for a variety of birds.

Project-related impacts to birds protected by these regulations would occur during the breeding season, because unlike adult birds, eggs and chicks are unable to escape impacts. Construction activities such as clearing and grubbing activities, as well as

noise and dust could directly and indirectly impact nesting birds. These impacts could potentially adversely impact nesting birds under the protection of the MBTA and are therefore considered significant.

Therefore, the Permittee will be subject to a standard condition of approval that will require the Permittee to conduct land clearing activities that would avoid the nesting season (January 1 – September 1) or conduct pre-construction surveys within the nesting season to determine presence or absence and if present, to avoid impacts to nesting birds.

Mitigation/Residual Impact(s)

Mitigation Measure BIO MM-1 – Pre-construction Surveys & Construction Monitoring for Monarch Butterfly

Purpose: To avoid impacts to monarch roosts during construction activities.

Requirement: The Permittee shall retain the services of a County-approved qualified biologist to conduct pre-construction roosting monarch surveys within 72 hours prior to construction activities (tree trimming or removal); that may impact the stand of eucalyptus trees occurring on the banks of the trapezoidal located along the eastern boundary of the Condition Use Permit (approximately 2,000 lineal feet).

Documentation: The Permittee shall provide to the Planning Division a copy of the executed contract with a County-qualified biologist, to conduct the Monarch Roosting Habitat Monitoring. A Survey Report documenting the results of the roosting monarch survey shall be provided to the Planning Division, 72 hours prior to any plans to trim or remove the *Eucalyptus* trees located along the eastern boundary of the Condition Use Permit (approximately 2,000 lineal feet). If roosting monarchs are detected, the Permittee will consult with the Planning Division prior to undertaking tree removal or trimming activities. Should activities occur that may potentially disturb roosting monarchs, a biological monitor will be required to monitor such activities to ensure that the potential roost is not disturbed.

Timing: Winter roosting monarch surveys shall be required, only between winter roosting season of the Monarchs (October to March). An initial pre-construction survey shall be conducted within 72 hours prior to construction activities (tree trimming or tree removal). Monitoring activities shall include periodic roosting monarch surveys prior to commencement of any construction activities that may disturb potential roost areas. The Permittee shall provide a copy of the preliminary monitoring report and a final report monitoring report to the Planning Division, within 14 days of the completion of activities that may impact the roosting habitat (*Eucalyptus* trees).

Monitoring and Reporting: The Permittee shall submit a copy of the executed contract (with financial information redacted) with the County-qualified biologist for the monitoring to the Planning Division for review. The Permittee shall provide a copy of the preliminary monitoring report and a final report. The Permittee shall submit the

preliminary monitoring report, 72 hours prior to impacting the roosting habitat (*Eucalyptus* trees). The final monitoring report shall be submitted to the Planning Division, within 14 days of the completion of monitoring activities. The Planning Division maintains copies of the executed contract and the monitoring reports in the Project file. The Planning Division has the authority to inspect the property during the monitoring phase of the Project to ensure that the County-approved biologist is on-site as required. If the Planning Division confirms that the County-approved qualified biologist is not monitoring the Project in compliance with this condition, enforcement actions may be enacted in accordance with § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

Mitigation Measure BIO MM-2 – Pre-Construction Surveys and Relocation of Special-Status Reptile Species

Purpose: To avoid significant impacts to special-status wildlife that could occur during vegetation removal and grading activities.

Requirement: Not less than two weeks prior to the commencement of ground disturbing activities (e.g., vegetation removal and grading), the Permittee shall install a silt-screen fence around the area of disturbance. This practice shall be implemented for each recurrence of vegetation removal and grading until the full extent of ground disturbing activities has been implemented under the approved project. The Permittee shall hire a County-approved qualified biologist to monitor all ground disturbing activities for the presence of special status wildlife. The County-approved qualified biologist shall possess a valid California Department of Fish and Wildlife (CDFW) Scientific Collecting Permit.

Following the installation of the silt-screen fence, the qualified biologist shall conduct preconstruction surveys within the fenced area for Coast horned lizard and Silvery Legless lizard. The qualified biologist shall ensure that these species are not harmed within these fenced areas. Individuals of these species that are found within the fenced area shall be relocated to suitable undisturbed habitat, outside of the areas directly and indirectly (e.g., noise) affected by the construction and operational phases of the project. The preconstruction surveys and relocation activities shall be conducted according to methods approved by the CDFW. The silt fencing must remain in place until the completion of ground disturbance activities.

Documentation: The Permittee shall submit the following documentation to the Planning Division for review and approval:

- Signed contract (financial information redacted) with a County-approved qualified biologist responsible for conducting preconstruction surveys and relocation of special status wildlife, with proof of a valid CDFW Scientific Collection Permit;
- Grading plan(s) which depict the location and specifications of the required exclusionary silt fencing, in compliance with the CDFW recommendations for excluding special status species from active construction areas;

- A memorandum prepared by the qualified biologist with confirms the completion of the preconstruction surveys, reports the results of the surveys and avoidance and relocation activities.

Timing: Prior to the issuance of a Zoning Clearance for construction, the Permittee shall submit the following documents:

- One copy of the signed contract (financial information redacted) with a County-approved biologist responsible for conducting preconstruction surveys and relocation of special status wildlife, with proof of a valid CDFW Scientific Collection Permit; and
- Three copies of the grading plans with the location and specifications of the required exclusionary silt fencing.

Within 30 days of the wildlife surveys and relocation activities, the Permittee shall provide a memorandum reporting the results.

Monitoring and Reporting: The Permittee shall confirm with the Planning Division that a County-approved qualified biologist has been contracted to implement the requirements of this condition prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the signed contract and the survey reports in the Project file. The Planning Division has the authority to inspect the property during the development phase of the Project to ensure that the survey and wildlife relocation work is conducted as required and the silt fencing is maintained as required. If the Planning Division confirms that the required surveys are not conducted as agreed upon or the fencing is not maintained as required, enforcement actions may be enacted in accordance with § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

Residual Impacts:

With the implementation Mitigation Measures BIO MM-1 and BIO MM-2, project-specific impacts, as well as the proposed project's contribution to significant cumulatively impacts to special status species and its habitats, would be reduced to a less than significant level.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
4B. Ecological Communities - Sensitive Plant Communities								
Will the proposed project:								
1) Temporarily or permanently remove sensitive plant communities through construction, grading, clearing, or other activities?	X				X			
2) Result in indirect impacts from project operation at levels that will degrade the health of a sensitive plant community?	X				X			

4B. Ecological Communities - Sensitive Plant Communities Impact Discussion:

4B-1and 4B-2. The subject parcel is in active agriculture (55 acres of orchards) that has been heavily modified to support agricultural production. Additionally, approximately 15 acres is dedicated to an agricultural organics processing facility. No sensitive plant communities occur on the parcel. The proposed project will not temporarily or permanently remove sensitive plant communities through any of the proposed construction activities. Additionally, operation of the proposed Commercial Organics Processing Operation will not result in any indirect impact that will degrade the health of a sensitive plant community.

Mitigation/Residual Impact(s)

The project will result in no impacts sensitive plant communities and no residual impacts. No mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
4C. Ecological Communities - Waters and Wetlands								
Will the proposed project:								
1) Cause any of the following activities within waters or wetlands: removal of vegetation; grading; obstruction or diversion of water flow; change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; or any disturbance of the substratum?			X			X		
2) Result in disruptions to wetland or riparian plant communities that will isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation?			X			X		
3) Interfere with ongoing maintenance of hydrological conditions in a water or wetland?			X			X		
4) Provide an adequate buffer for protecting the functions and values of existing waters or wetlands?			X			X		

4C. Ecological Communities - Waters and Wetlands Impact Discussion:

4C-1 through 4C-4. There are no areas meeting the three mandatory criteria (hydrology, hydric soils and hydrophytic vegetation) that define “wetlands waters of the U.S.” that occur within the parcel. As indicated in the Analysis for Biological Resources (Attachment 11), an improved/concrete lined channel occurs along the eastern boundary of parcel (denoted as “W-2” in the Waters and Wetlands Map.). The channel is identified as “state waters” and a “waters of the U.S.” and is therefore regulated under Section 1602 of the California Department of Fish and Wildlife Code administered by the California Department of Fish and Wildlife (CDFW) and under Section 404 of the Clean Water Act administered by the Army Corps of Engineers (USACE); respectively. Although this channel occurs along the eastern CUP boundary there are no proposed activities that would encroach into this channel or result in direct or indirect impacts to

this channel. Facility structures are proposed to be sited away from the channel; the Wet Organics building is setback 50 feet from the edge of the channel. An existing agricultural drainage (approximately an 0.90-acre area of State Waters) will be modified via a double barrel pipe pass-through which will direct flows through the facility to the south side of the facility to an existing drainage structure at Roger Road. Therefore, no impacts to the channel is anticipated from proposed construction or operation of the facility.

Ventura County Biological Resources Policy 1.5.2-4 states: “Discretionary development shall be sited a minimum of 100 feet from significant wetland habitats to mitigate the potential impacts on said habitats. Buffer areas may be increased or decreased upon evaluation and recommendation by a qualified biologist and approval by the decision-making body. Factors to be used in determining adjustment of the 100-foot buffer include soil type, slope stability, drainage patterns, presence or absence of endangered, threatened or rare plants or animals, and compatibility of the proposed development with the wildlife use of the wetland habitat area.”

The trapezoidal concrete lined channel is recognized as a “significant wetland” under the County definition. The Applicant is requesting a reduced buffer of 25 feet. Based on the biological assessment of the drainage conducted by the biologist and described in the ISBA (Attachment 11), reduction of the buffer width from the typical 100 feet between the development envelope and the wetlands is not considered to be a significant impact. This is because the segment of the flood control channel adjacent to the CUP’s eastern boundary is heavily disturbed and lacks native vegetation or any associated riparian habitat. Additionally, facility drainage will not be directed to this channel. Therefore, a buffer of 25 feet is adequate to prevent impacts to the drainage.

In the central portion of the parcel is an unnamed ephemeral drainage that traverses the parcel in a northeast to southwest orientation (denoted as “W-2” in the Waters and Wetlands Map, Attachment 11). This drainage supports approximately 0.90 acres of “State Waters”, under the jurisdictional oversight of the California Department of Fish and Wildlife (CDFW), pursuant to Section 1600 of the Fish and Game Code. The US Army Corps of Engineers (USACE) has determined that the unnamed drainage to be an upland-excavated drainage ditch which only drains uplands and is therefore not considered a Waters of the U.S. Therefore, the unnamed drainage is not jurisdictional and is not regulated under Section 404 of the Clean Water Act by the USACE (ISBA, 2016, Attachment 11).

Activities proposed will not impact USACE jurisdictional waters as the unnamed drainage is not considered Waters of the U.S. In addition, as stated earlier, no wetland areas meeting the three mandatory criteria (hydrology, hydric soils and hydrology) will be impacted by the project. However, project approval will result in impacts to 0.90 acres of State Waters, due to the filling of the unnamed drainage in support of the installation of a double barrel arch pipe pass-through. The pipe pass-through will direct flows through the facility to the south side of the facility to an existing drainage structure at Roger Road.

Due to the lack of native plant assemblages and wildlife habitat within the unnamed drainage, the filling of the unnamed ephemeral drainage/ agricultural ditch will not result in wildlife habitat loss and therefore, no mitigation for habitat loss is required. However, the permanent loss of approximately 0.90 acres of State Waters is a potentially significant impact as the filling of the drainage will result in morphological changes to the drainage and result in diversion or obstruction of the natural drainage flow. The Applicant proposes this modification to expand the existing footprint of the existing Organics Processing Operation from 15-acres to 70-acres and to increase annual loading from 60,000 tons per year to 295,000 tons per year. Therefore, MM-BIO 3 is proposed, entailing the procurement a Lake and Streambed Alteration Agreement (LSAA), and compliance with California Fish and Game Code § 1602. With the implementation of this mitigation, impacts to state waters will be reduced to a level below significance.

Mitigation/Residual Impact(s)

Mitigation Measure BIO MM-3 – California Department of Fish and Wildlife (CDFW) Lake & Streambed Alteration Agreement (LSAA)

Purpose: To ensure compliance with California Fish and Game Code § 1602.

Requirement: The Permittee shall obtain a LSAA from the CDFW for any excavation, fill, or other land disturbance activity within the ephemeral drainage depicted in the site drawings, identified as W-1 of the Waters and Wetlands map of the Initial Study Biological Assessment (January 2016, Exhibit TBD).

Documentation: The Permittee shall provide written proof or documentation to the County that the Permittee has obtained either: (1) the LSAA from the CDFW; or, (2) written verification from CDFW stating that a LSAA is not required.

Timing: The Permittee shall provide the LSAA or written verification from the CDFW to the Planning Division prior to issuance of a Zoning Clearance for construction.

Monitoring and Reporting: The Planning Division maintains a copy of the LSAA provided by the Permittee in the Project file. Monitoring of any mitigation measures required as part of the LSAA is the responsibility of CDFW.

Residual Impact(s):

With the implementation Mitigation Measures BIO MM-3, project-specific impacts, as well as the proposed project's contribution to significant cumulatively impacts to the unnamed ephemeral drainage; would be reduced to a less than significant level.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
4D. Ecological Communities - ESHA (Applies to Coastal Zone Only)								
Will the proposed project:								
1) Temporarily or permanently remove ESHA or disturb ESHA buffers through construction, grading, clearing, or other activities and uses (ESHA buffers are within 100 feet of the boundary of ESHA as defined in Section 8172-1 of the Coastal Zoning Ordinance)?	X				X			
2) Result in indirect impacts from project operation at levels that will degrade the health of an ESHA?	X				X			

4D. Ecological Communities - ESHA (Applies to Coastal Zone Only) Impact Discussion:

4D-1 and 4D-2. The project site is not located in the Coastal Zone; therefore, ESHA policies and analysis do not apply.

Mitigation/Residual Impact(s)

No impacts identified. No mitigation required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
4E. Habitat Connectivity								
Will the proposed project:								
1) Remove habitat within a wildlife movement corridor?		X				X		
2) Isolate habitat?		X				X		
3) Construct or create barriers that impede fish and/or wildlife movement, migration or long-term connectivity or interfere with wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction?			X				X	
4) Intimidate fish or wildlife via the introduction of noise, light, development or increased human presence?		X				X		

4E. Habitat Connectivity Impact Discussion:

4E-1. through 4E. The Santa Clara River is located along the southern edge of the project, approximately ¼ 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 riparian corridor of the Santa Clara River serves as a suitable habitat (cover, food and shelter) for wildlife movement in the river corridor. The southern boundary of the proposed CUP area is located approximately 800 feet from the edge of the riparian corridor. The Planning Division Staff Biologist determined that this was an sufficient buffer distance between the operational limits of the project and the riverine habitat that supports wildlife movement. The Applicant is not proposing the removal of habitat within the river corridor or modifications to the river ecosystem. Therefore, proposed project development is not anticipated to result in direct impacts to Santa Monica-Sierra Madre wildlife corridor and wildlife movement. However, lighting of the facility operations, especially during night times, may impair wildlife movement of animals that may incidentally use the river corridor next to the project site.

Interruption of darkness by artificial lighting may result in disruptive side effects for wildlife, especially to nocturnal animals that depend upon darkness for movement. Reproductive cycles are most often disrupted when artificial light at night interferes with

species' natural detection systems. Change in light signals the start of activities as foraging (feeding and substance), sheltering, mating and reproducing (fireflies and frogs), and communicating (e.g.: coyotes). Artificial lights alter an animal's circadian rhythm (an animal's natural 24-hour cycle of biological processes) and create miss-cues. These potential negative impacts from lighting are therefore considered significant impacts. MM BIO-4 is therefore proposed, which requires the Permittee to prepare and implement a Lighting Plan, to protect wildlife movement. With the implementation of mitigation measure MM BIO-4, indirect impacts to wildlife corridor and wildlife movement from lighting, would be reduced to a level below significance.

Mitigation/Residual Impact(s)

Mitigation Measure BIO MM-4 – Lighting Plan

Purpose: In order to mitigate impacts associated with night lighting to wildlife movement, and ensure lighting on the subject property is provided in compliance with § 8106-8.6 of the Ventura County Non-Coastal Zoning Ordinance and to ensure the following objectives are met:

- a. avoids interference with reasonable use of adjoining properties;
- b. avoids conflict with landscape features;
- c. minimizes on-site and eliminates off-site glare;
- d. provides adequate on-site lighting for security;
- e. minimizes impacts to wildlife movement;
- f. minimizes energy consumption; and
- g. includes devices that are compatible with the design of the permitted facility.

Requirement: The Permittee shall submit two copies of a lighting plan to the Planning Division for review and approval prior to implementing such plan. The lighting plan must comply with the following:

- a. the lighting plan shall be prepared by an electrical engineer registered by the State of California;
- b. the lighting plan shall include a photometric plan and manufacturer's specifications for each exterior light fixture type (e.g., light standards, bollards, and wall mounted packs).
- c. the lighting plan shall provide illumination information for all exterior lighting such as parking areas, walkways/driveways, streetscapes, and open spaces proposed throughout the development;
- d. all outdoor lighting must be located within 100 feet of a structure or adjacent to a driveway and shall be hooded to direct light downward onto buildings, structures, driveways, or yards, to prevent the illumination of surrounding habitat. Floodlights are prohibited.

- e. in order to minimize light and glare on the project property, all parking lot lighting, exterior structure light fixtures, and freestanding light standards must be a cut-off type, fully shielded, and downward directed, such that the lighting is projected downward onto the property and does not cast light on any adjacent property or roadway; and,
- f. light emanation shall be controlled so as not to produce excessive levels of glare or abnormal light levels directed at any neighboring uses. Lighting shall be kept to a minimum to maintain the normal night-time light levels in the area, but not inhibit adequate and safe working light levels.

The Permittee shall bear the total cost of the review and approval of the lighting plan. The Permittee shall install all exterior lighting in accordance with the approved lighting plan.

Documentation: The Permittee shall submit two copies of a lighting plan to the Planning Division for review and approval.

Timing: The Permittee shall obtain the Planning Division's approval of the lighting plan prior to the issuance of a Zoning Clearance for construction. The Permittee shall maintain the lighting as approved in the lighting plan for the life of the Project.

Monitoring and Reporting: The Planning Division maintains a stamped copy of the approved lighting plan in the Project file. The Permittee shall ensure that the lighting is installed according to the approved lighting plan prior to occupancy. The Building and Safety Inspector and Planning Division staff have the authority to ensure that the lighting plan is installed according to the approved lighting plan. Planning Division staff has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8114-3 of the *Non-Coastal Zoning Ordinance*.

Mitigation/Residual Impact(s):

With implementation of Mitigation Measure BIO MM-4, the proposed project will have a less-than-significant project-specific impact on wildlife corridor and wildlife movement and will not make a cumulatively considerable contribution to a significant cumulative impact related to a wildlife movement corridor.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
4F. Will the proposed project be consistent with the applicable General Plan Goals and Policies for Item 4 of the Initial Study Assessment Guidelines?			X				X	

4F. Impact Discussion:

4F. The project was reviewed and found to be consistent with the *Ventura County General Plan* Goals, Programs and Policies for Item 4 of the Initial Study Assessment Guidelines. The *Ventura County General Plan Biological Resources Policy 1.5.2.1*, requires an evaluation by a qualified biologist to assess the potential adverse impacts and, if necessary, the development of mitigation measures for discretionary development that has the potential to adversely affect biological resources. Biological assessment surveys were conducted at the project site by BioResource Consultants, Inc. (BRC; Attachment 11). The proposed project will result in a potentially significant impact to an unnamed ephemeral drainage along the unnamed agricultural road; the drainage transverse the site from north to south and is located 120 feet to the east of the existing facility driveway. The unnamed ephemeral drainage occurs in the central portion of the Study Area and drains south from the Santa Paula Railroad to outside the Survey Area to Roger Road and continues to the Santa Clara River. Proposed project site improvements require this unnamed ephemeral drainage to be filled and surface drainage redirected to the detention basins via subgrade drainage pipes. The drainage, which occurs in the middle of the CUP boundary, is ‘state waters’ and a County-recognized ‘significant’ wetland. Recommended mitigation measure BIO MM-3 requires the Permittee to submit a California Department of Fish and Wildlife (CDFW) Lake & Streambed Alteration Agreement (LSAA) or written verification that a permit is not required, to mitigate this impact. Implementation of BIO MM-3 is expected to offset impacts to this unnamed ephemeral drainage.

Ventura County General Plan Policy 1.5.2-4 requires development to be setback a minimum 100 feet from significant wetland habitats. The proposed project is adjacent to and west of a drainage channel, a state waters, a water of the US, and a significant wetland habitat. The Applicant is seeking a reduced buffer from 100 feet to a width of 25 feet between facility operations and channel. The area is heavily disturbed and lacks native vegetation and any associated riparian habitat, the type of site features which typically warrant the incorporation of a larger buffer. The proposed 25-foot buffer has been evaluated by the Planning Division Biologist for potential impacts to wetland habitats and the Survey Area conditions noted within the ISBA (Attachment 11) were verified. The project is therefore consistent with Biological Resource Policy 1.5.2-3. Biological Resource.

The project site is 1/4 mile north of the Santa Clara River. The segment of the river ecosystem adjacent to the project site is recognized as the Santa Monica-Sierra Madre Wildlife Corridor. Proposed project actions do not entail removal of habitat within the corridor or actions that would directly impair wildlife movement within the river. Recommended mitigation measure BIO MM-4 – Lighting Plan requires the Permittee to submit for review and approval a Lighting Plan. When implementation of this BIO MM-4, potential lighting impacts on wildlife movement would be reduced to a less than significant level.

With regard to the applicable General Plan Goal and Policies, the proposed project does not involve the removal of special status plant or animal species as indicated above. Additionally, an Initial Study Biological Assessment (BRC; Attachment 11) was prepared for the project in conformance with the County's Initial Study Assessment Guidelines (ISAG). The ISBA identifies impacts to suitable habitat (monarch butterfly (*Danaus plexippus*), silvery legless lizard (*Anniella pulchra pulchra*) and coast horned lizard (*Phrynosoma blainvillii*)) and permanent impacts to State Waters, however mitigation has been added to the project which will reduce impacts below the threshold of significance. The proposed project is therefore consistent with applicable General Plan Policies and Goals.

Mitigation/Residual Impact(s):

With the implementation of the biological mitigation measures BIO MM-1 through BIO MM-4, the proposed project will be consistent with all applicable *Ventura County General Plan* policies governing biological resources.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
5A. Agricultural Resources – Soils (PIng.)								
Will the proposed project:								
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 Section 5a.C of the Initial Study Assessment Guidelines?				X				X
2) Involve a General Plan amendment that will result in the loss of agricultural soils?					X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 5A of the Initial Study Assessment Guidelines?				X				X

5A. Agricultural Resources – Soils (PIng.) Impact Discussion:

5A-1. The project site, with the exception of the existing 15-acre agricultural organics processing facility, includes soils designated as “Prime” in the Ventura County Important Farmland Inventory (IFI). The proposed project includes the creation of a 70-acre commercial organics processing facility where the existing agricultural organics processing facility is located and on and approximately 55 acres of orchards. Pursuant to Section 5a.C of the *Ventura County Initial Study Assessment Guidelines*, converting more than five acres of designated prime soils on Agricultural designated lands is considered a significant impact. The proposed project would convert approximately 55 acres of existing orchards which is considered a potentially significant impact.

5A 2. 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, however as noted in Section 5A 1 (above), the proposed project would result in the loss of agricultural soils. The Applicant is requesting a text amendment to NCZO Section 8107-36.4.1 - General Standards, to allow a commercial organics processing operation. Presently, no organics processing operations, other than those accessory to agricultural activities and on-site composting operations, can be located in the AE 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. The proposed project does not include a General Plan amendment and will not make a

cumulatively considerable contribution to a significant cumulative impact to agricultural soils as defined for Item 5A 2.

5A 3. The proposed project has the potential to conflict with the following General Plan policies and goals:

Goal 1.6.1-1: Preserve and protect agricultural lands as a nonrenewable resource to assure the continued availability of such lands for the production of food, fiber and ornamentals.

Policy 1.6.2-1: Discretionary development located on land designated as Agricultural (see Land Use Chapter) and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory, shall be planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil.

Due to project related impacts associated with the conversion of 55-acres of classified agricultural soils, further evaluation of the consistency between the proposed project and the identified General Plan goal and policy is warranted.

Mitigation/Residual Impact(s):

Impacts to agricultural resources are considered significant and will be evaluated in an EIR.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
5B. Agricultural Resources - Land Use Incompatibility (AG.)								
Will the proposed project:								
1) If not defined as Agriculture or Agricultural Operations in the zoning ordinances, be closer than the threshold distances set forth in Section 5b.C of the Initial Study Assessment Guidelines?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 5b of the Initial Study Assessment Guidelines?		X				X		

5B. Agricultural Resources - Land Use Incompatibility (AG.) Impact Discussion:

5B-1. The proposed project includes the development of a Large-Scale Commercial Organics Processing Operation. The proposed land use is not listed under the

Agriculture or Agricultural Operations categories of the Ventura County NCZO Section 8105-4 Permitted Uses Open Space, Agricultural, Residential and Special Purpose Zones, however the proposed commercial composting facility is permitted in the AE zone with an approved CUP. The proposed project was evaluated for conformance with the Agricultural Commissioners Agricultural/Urban Buffer Policy, which requires a 300-foot setback between non-agricultural uses and agriculture land uses. Non-agricultural land uses (compost piles and the proposed facility buildings) will be approximately 48 feet from adjoining agricultural uses.

On October 7, 2019, the proposed project was heard before the Agricultural Policy Advisory Committee (APAC) and the Agricultural Commissioner. The Applicant requests a reduced buffer from the 300-foot setback requirement. APAC recommended the following requirements:

1. Installation of a vegetative screen which conforms to the minimum standards in the buffer policy;
 - 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 should be vigorous, drought tolerant and at least 6 feet in height at the time of installation
 - Plants should have 50% to 75% porosity (i.e., approximately 50% to 75% of the plant is air space)
 - Plant height should vary in order to capture drift within 4 feet of ground applications
 - A mature height of 15 feet or more is required for trees
 - To ensure adequate coverage, 2 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 eight-foot high chain link fence with top bar;
3. Coordination between Limoneira Company and the Permittee regarding the schedule of agricultural spraying and notification thereof;
4. Posting of Right-to-Farm Ordinance at the project site; and,
5. Execution of an agreement to modify practices (between the Permittee and the Office of the Ventura County Agricultural Commissioner), if needed.

A reduced buffer will address the visual compatibility/aesthetic issues associated with the proposed project, screening the development from the adjacent agricultural lands and any potential public viewing locations. With the implementation and review of prescribed reduced buffer requirements, the proposed project would have less than significant impact on surrounding agricultural uses.

5B-2. With implementation of prescribed reduced buffer requirements incorporated into the project as conditions of approval, the project is consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 5b of the Ventura County Initial Study Assessment Guidelines.

Based on the above discussion, project-specific and cumulative impacts on agricultural land use incompatibility will be less than significant.

Mitigation/Residual Impact(s)

Potential impacts on agricultural resources will be less-than-significant and no mitigation is required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
6. Scenic Resources (PIng.)								
Will the proposed project:								
a) Be located within an area that has a scenic resource that is visible from a public viewing location, and physically alter the scenic resource either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects?		X				X		
b) Be located within an area that has a scenic resource that is visible from a public viewing location, and substantially obstruct, degrade, or obscure the scenic vista, either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects?		X				X		
c) Be consistent with the applicable General Plan Goals and Policies for Item 6 of the Initial Study Assessment Guidelines?		X				X		

6. Scenic Resources (PIng.) Impact Discussion:

6a. and 6b. The project site does not include any land within the Scenic Resource Protection (SRP) Overlay Zone. However, the site is located approximate ¼ mile north of the Santa Clara River and ¼ mile south of and State Route 126, an Eligible County Scenic Highway. The site is currently occupied by a 15-acre agricultural material composting operation that will be expanded to cover approximately 70 acres and include a commercial organics processing facility that would process food and green material delivered to the site. Existing agriculture provides a buffer between the existing composting operation and public viewing locations from Highway 126 and the Santa Clara River. Edwards Ranch Road is a private road and views of the project site would be seen from this location. A review of the project plans (Attachment 2) and photo simulations (Attachment 12, dated January 18, 2016), indicates the Facility Administration Building will be the tallest structure (35 ft in height) and the Wet and Dry Organics Building will be the largest (80,925 sf each). The project is setback from Highway 126 such that motorists traveling along this highway would only see the upper portion of the Facility Administration Building for a brief moment. Unless there is a reason to enter the Santa Clara River, 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 have less than significant impacts on scenic resources in the viewshed surrounding the project site.

Lighting is proposed as part of the of the project that could be visible from public views, if it is excessive or shines into adjacent areas. Therefore, Mitigation Measure BIO MM-4 is proposed, which requires the Applicant to submit a lighting plan to the Planning Division for review and approval.

The proposed project will include development that is characteristic of an industrial facility. Proposed buildings will support composting operations and provide office and classroom space for employees. Windrows will be located throughout the project site, with heavy equipment moving composting materials throughout the site. In order to minimize views of the facility and the intensity of uses that the proposed development will introduce, the project will be conditioned to require the Applicant to submit a materials sample/color board at the time of construction of the new buildings utilizing natural building materials and colors (earth tones and non-reflective paints). The Applicant will also be required to submit a landscape plan to provide visual screening of the facility as part of the screening and landscaping provided under Mitigation Measure CULTURAL MM-2.

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.

6c. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 6 of the *Ventura County Initial Study Assessment Guidelines*.

Conditions of Approval/Residual Impact(s)

Building Materials and Colors

Purpose: In order to ensure that buildings and structures comply with the development standards of the Ventura County Non-Coastal Zoning Ordinance and Ventura County General Plan Policy 1.7.2.2(3)(e) and blend in with the Project site's surroundings.

Requirement: The Permittee shall utilize building materials and colors compatible with surrounding terrain (earth tones and non-reflective paints) on exterior surfaces of all structures, including but not limited to the proposed buildings, water tanks, walls, and fences. All glass and other materials used on building exteriors and structures must be selected to minimize reflective glare.

Documentation: A copy of the approved plans denoting the building materials and colors.

Timing: Prior to the issuance of a Zoning Clearance for construction, the Permittee shall submit the building plans with the colors and materials noted on all structures for review and approval by the Planning Division. Prior to occupancy, the Permittee shall paint the structures according to the approved plans.

Monitoring and Reporting: The Planning Division maintains the approved plans in the Project file. Prior to occupancy, the Planning Division has the authority to inspect the site to ensure that the exterior of the structures were treated as approved. The Permittee shall maintain these materials and colors throughout the life of the Project. The Planning Division has the authority to inspect the site to confirm on-going compliance with the approved plans consistent with the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

Based on the discussion above, no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
7. Paleontological Resources								
Will the proposed project:								
a) For the area of the property that is disturbed by or during the construction of the proposed project, result in a direct or indirect impact to areas of paleontological significance?		X				X		
b) Contribute to the progressive loss of exposed rock in Ventura County that can be studied and prospected for fossil remains?		X				X		
c) Be consistent with the applicable General Plan Goals and Policies for Item 7 of the Initial Study Assessment Guidelines?		X				X		

7. Paleontological Resources Impact Discussion:

7a. In accordance with the Ventura County Initial Study Assessment Guidelines, Planning Division staff reviewed the Paleontological Map Series of the RMA GIS (2015c), which indicated the subject property has an undetermined paleontological importance. In addition, staff review the California Department Conservation GIS map located at <https://maps.conservation.ca.gov/cgs/QSD>, which identifies the geologic formation of the subject property as Alluvial fan deposits (Holocene to Pleistocene Quaternary Deposits) and Stream terrace deposits (early Holocene to Pleistocene)

within the project site. Pursuant to the Ventura County Initial Study Assessment Guidelines, the paleontological importance of the project site is considered low (Ventura County, 2015a).

Although the proposed project will not likely result in impacts to paleontological resources, future ground disturbance activities will be subject to the following condition of approval, to ensure the protection of any subsurface resources that are inadvertently encountered during ground disturbance activities.

Paleontological Resources Discovered During Grading

Purpose: In order to mitigate potential impacts to paleontological resources that may be encountered during ground disturbance or construction activities.

Requirement: If any paleontological remains are uncovered during ground disturbance or construction activities, the Permittee shall:

- a. Cease operations and assure the preservation of the area in which the discovery was made;
- b. Notify the Planning Director in writing, within three days of the discovery;
- c. Obtain the services of a paleontological consultant or professional geologist who shall assess the find and provide a report that assesses the resources and sets forth recommendations on the proper disposition of the site;
- d. Obtain the Planning Director's written concurrence with the recommended disposition of the site before resuming development; and
- e. Implement the agreed upon recommendations.

Documentation: The Permittee shall submit the paleontologist's or geologist's reports. Additional documentation may be required to demonstrate that the Permittee has implemented the recommendations set forth in the paleontological report.

Timing: If any paleontological remains are uncovered during ground disturbance or construction activities, the Permittee shall provide the written notification to the Planning Director within three days of the discovery. The Permittee shall submit the paleontological report to the Planning Division immediately upon completion of the report.

Monitoring and Reporting: The Permittee shall provide the paleontological report to the Planning Division to be made part of the Project file. The Permittee shall implement any recommendations made in the paleontological report to the satisfaction of the Planning Director. The paleontologist shall monitor all ground disturbance activities within the area in which the discovery was made, in order to ensure the successful implementation of the recommendations made in the paleontological report. The

Planning Division has the authority to conduct site inspections to ensure that the Permittee implements the recommendations set forth in the paleontological report, consistent with the requirements of § 8114-3 of the *Ventura County Non-Coastal Zoning Ordinance*.

7b. The proposed project will not contribute to the progressive loss of exposed rock in Ventura County that can be studied and prospected for fossil remains. Therefore, the proposed project will not create a project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact to paleontological resources.

7c. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 7 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

Based on the discussion above, no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
8A. Cultural Resources - Archaeological								
Will the proposed project:								
1) Demolish or materially alter in an adverse manner those physical characteristics that account for the inclusion of the resource in a local register of historical resources pursuant to Section 5020.1(k) requirements of Section 5024.1(g) of the Public Resources Code?		X				X		
2) Demolish or materially alter in an adverse manner those physical characteristics of an archaeological resource that convey its archaeological significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for the purposes of CEQA?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 8A of the Initial Study Assessment Guidelines?		X				X		

8A. Cultural Resources - Archaeological Impact Discussion:

8a-1 and 8a-2. The proposed project will be located on a 70-acre portion of a 994-acre lot, within the Saticoy and Santa Paula 7.5 Minute Series Topographic Quadrangle Maps (USGS, 2015). The project site has been historically used for agricultural purposes and is presently cultivated with row crops and orchard plantings. The site is also occupied by the existing agricultural composting operation which currently occupies 15 acres of the subject property.

County Planning staff reviewed the Resources Appendix of the Ventura County General Plan (Figure 1.8.1) the County GIS database, and permits on adjoining properties. The project site is not located within either the Very Sensitive or Sensitive areas of the Archeological Sensitivity Map, and no past archaeological survey had been performed for the subject property.

On April 3, 2019, County Planning staff contacted the South Central Coastal Information Center (SCCIC) to determine if an archaeological assessment would need to be performed. SCCIC is an affiliate of the State Office of Historic Preservation and the official repository for archaeological records for most of Southern California. SCCIC determined that a Phase I Archeological Resources Report should be prepared by a professional archaeologist prior to approval of project plans due the unknown archeological sensitivity of the project area. The Phase I Archeological Resources Report consists of a summary of the findings of the archeological record search, a surface survey of the project impact area and recommendations from the archeologist on appropriate actions for project implementation.

Padre Associates, Inc. was contracted by the Applicant to prepare the Phase I Archeological Resources Report. The formal record search performed by Padre indicated that no archaeological resources have been previously recorded within ½ miles of the project site. Though no archeological sites have been previously recorded within the ½ miles of the project site, the site is located within close proximity to the Western Santa Clara Valley Historic District and the Orchard Farm Historic District. Impacts related to these resources are evaluated further in 8b.

Padre Associates, Inc. also conducted a pedestrian survey of the project site on May 8, 2019. The survey did not identify any archeological resources within the project survey area.

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 coastal resources. On April 12, 2019, Ms. Julie Tumamait-Stenslie, Chair of the Barbareno-Ventureno Band of Mission Indians and designated Native American Heritage Commission tribe listed with traditional lands or cultural places within the boundary of Ventura County, requested to review the Phase I Cultural Resources Report. The report was provided to Ms. Tumamait-Stenslie on May 16, 2019. As of the date of this report, 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 resource surveys would be required for the proposed development. Although the proposed project is unlikely to result in impacts to archaeological resources, future ground disturbance activities will be subject to the condition of approval (below), to ensure the protection of any subsurface resources if they are inadvertently encountered during ground disturbance activities.

With the inclusion of archaeological resources condition (below), the proposed project would not demolish or materially alter in an adverse manner the physical characteristics of an archaeological resource in a local register, pursuant to Section 5020.1(k) requirements of Section 5024.1(g) of the Public Resources Code. Therefore, the proposed project will have a less-than-significant impact on archaeological resources. Furthermore, the proposed project will not make a cumulatively considerable contribution to a significant cumulative impact related to archaeological resources.

8a-3. With implementation of the recommended condition of approval, the proposed project is consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 8a of the *Ventura County Initial Study Assessment Guidelines*.

Condition of Approval/Residual Impact(s)

Archaeological Resources Discovered During Grading

Purpose: In order to mitigate potential impacts to archaeological resources discovered during ground disturbance.

Requirement: The Permittee shall implement the following procedures:

- a. If any archaeological or historical artifacts are uncovered during ground disturbance or construction activities, the Permittee shall:
 - (1) Cease operations and assure the preservation of the area in which the discovery was made;
 - (2) Notify the Planning Director in writing, within three days of the discovery;
 - (3) Obtain the services of a County-approved archaeologist who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
 - (4) Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and
 - (5) Implement the agreed upon recommendations.

- b. If any human burial remains are encountered during ground disturbance or construction activities, the Permittee shall:
- (1) Cease operations and assure the preservation of the area in which the discovery was made;
 - (2) Immediately notify the County Coroner and the Planning Director;
 - (3) Obtain the services of a County-approved archaeologist and, if necessary, Native American Monitor(s), who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
 - (4) Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development on-site; and
 - (5) Implement the agreed upon recommendations.

Documentation: If archaeological remains are encountered, the Permittee shall submit a report prepared by a County-approved archaeologist including recommendations for the proper disposition of the site. Additional documentation may be required to demonstrate that the Permittee has implemented any recommendations made by the archaeologist's report.

Timing: If any archaeological remains are uncovered during ground disturbance or construction activities, the Permittee shall provide the written notification to the Planning Director within three days of the discovery. The Permittee shall submit the archaeological report to the Planning Division immediately upon completion of the report.

Monitoring and Reporting: The Permittee shall provide the archaeological report to the Planning Division to be made part of the Project file. The Permittee shall implement any recommendations made in the archaeological report to the satisfaction of the Planning Director. The archaeologist shall monitor all ground disturbance activities within the area in which the discovery was made, in order to ensure the successful implementation of the recommendations made in the archaeological report. The Planning Division has the authority to conduct site inspections to ensure that the Permittee implements the recommendations set forth in the archaeological report, consistent with the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

Based on the discussion above, no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
8B. Cultural Resources – Historic (PInG.)								
Will the proposed project:								
1) Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources?			X				X	
2) Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code?			X				X	
3) Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA?			X				X	
4) Demolish, relocate, or alter an historical resource such that the significance of the historical resource will be impaired [Public Resources Code, Sec. 5020(q)]?			X				X	

8B. Cultural Resources – Historic (PInG.) Impact Discussion:

8B-1. through 8B-4. The proposed project is located on a 70-acre portion of a 994-acre parcel, within the Saticoy and Santa Paula 7.5 Minute Series Topographic Quadrangle Maps (USGS, 2015). The subject property is located within the western Santa Clara Valley, a geographic area between Saticoy to the west and the City of Santa Paula to the east. The subject property has been historically used for agricultural purposes and is presently cultivated with row crops and orchard plantings. The parcel also contains residential buildings and agricultural support structures.

The subject property 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 subject property also contains Ventura County Landmark No. 2 - The More-Edwards Adobe. A Phase II Historic Resources Report (HRR) was prepared by San Buenaventura Research Associates (SBRA) to assess whether the proposed project will have significant adverse impacts on these districts and the designated Ventura County Landmark No. 2. (Attachment 13).

The western Santa Clara Valley was determined to be eligible for listing as a rural historic landscape district under NRHP evaluation Criterion A as a result of the area's characteristic expression of growth and development related to the area's period of significance (1860-1946). The survey states,

“The district illustrates the historical development of agricultural products and farming techniques, and documents the progression of this land use from the dry farming of grains and row crops, to irrigated tree crops and citrus ranching. The district also illustrates the historic use of the land within the adjacent canyons for stock raising and tree crops.”

Under the NRHP evaluation Criterion C, the survey found that the district was one of the best-preserved examples of a mature Southern California citriculture landscape. The district possesses a significant concentration of buildings, structures, objects and sites related to the citriculture land use. The project site is also within a subarea evaluated in the survey and separately determined to be eligible under NRHP evaluation Criterion A and C. The Edwards Ranch-Orchard Farm was part of the larger Rancho Santa Paula y Saticoy granted to Manuel Jimeno Casarin in 1843, and subsequently sold to Thomas Wallace More in the late 1850's. The 1,043-acre Edwards Ranch-Orchard Farm was apportioned from the Rancho Santa Paula y Saticoy in 1867. The survey identifies the property as the oldest continuous operating ranch in the western Santa Clara Valley. From the period of the late 1850's to Samuel Edwards' purchase of the property in 1883, various buildings and structures were constructed on the subject property. This period is also noteworthy for the introduction of the first 160-acre orchard on the ranch in 1862.

Buildings and structures contributing to the eligibility determination include:

- The More-Edwards Adobe: A cluster of buildings located approximately 250 feet west of the project site comprised of the More-Edwards Adobe and five secondary residences. The More-Edwards Adobe was constructed in 1860 by W.D. Hobson for Thomas Wallace More. Other buildings within this grouping include an office building, two barns, equipment sheds and a row of other buildings that include a schoolhouse moved onto the property after 1902. The Historical Resources Report (Attachment 13) notes that severe structural damage to the More-Edwards Adobe has occurred since the survey occurred in 1996. The report notes that:

“a substantial portion of the building’s eastern wall and a portion of the southern wall have collapsed. The two-story porch on the southern elevation is now almost entirely missing. Wood lap siding covering the adobe wall on the western elevation is bowed in places, suggesting the presence of structural trauma in the wall underneath.”

- Ranch Residence: A circa 1920 single story residence and barn located approximately 25 feet from the project site. The residence is presently occupied.
- Edwards House: A circa 1910 two-story residence, a tennis court and landscaping improvements.

The historic resources report identifies potential project-related impacts and cumulative impacts associated with pending and approved projects within the vicinity of the project area. The project related impacts 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 will result in a reduction of design and setting integrity to the districts and should be regarded as having a significant adverse impact on these districts. Similarly, the operation of the proposed Large-Scale Commercial Organic Processing Operation will 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. This activity will result 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 (CHB) conducted a public meeting to review the project. The CHB 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 CHB 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, and CULTURAL MM-2. Mitigation measure CULTURAL MM-1 will address data recovery and CULTURAL MM-2 requires the Applicant to submit a landscape plan that will introduce a buffer and screen between these structures. No direct impacts to Ventura County Landmark No. 2 (the More-Edwards Adobe) will result from the proposed project; the project will not result in demolition or modification of the building and does not involve operational activities that can impact the structure. Project traffic will 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.

Mitigation/Residual Impact(s)

Mitigation Measure CULTURAL MM-1 – Historic American Buildings Level-III Photo Survey

Purpose: In order to document and formally catalogue the condition of the existing More-Edwards farm cluster.

Requirement: A qualified Historic American Buildings (HABS) photographer in concert with a qualified architectural historian shall collect HABS -Level III documentation of the site. This shall include documentation of the More-Edwards farm cluster spatial relationships, historic context, and the structures, objects and buildings within the farm cluster.

Documentation: The documentation will consist of overview photographs of the farm cluster, photo caption index, photo key maps, and a short-form historic report incorporating a basic plan of the site to create a historic record with 16 to 20 photographic views taken on large format (4-inch x 5-inch or 5-inch x 7-inch) film.

Timing: Prior to the issuance of a Zoning Clearance for construction, the Permittee shall submit one (1) copy of the signed contract (financial information redacted) with a HABS photographer and architectural historian responsible for conducting the HABS survey and one (1) copy of a statement of qualifications for both contractors. The HABS survey shall be conducted prior to commencement of any ground disturbing activities. Within 30 days of the completion of the HABS surveys, the Permittee shall provide documentation of the survey results.

Monitoring and Reporting: The Planning Division and Cultural Heritage Board Program Staff maintains copies of the signed contract and the HABS III survey in the Project file. The Planning Division has the authority to inspect the property during the construction phase of the Project to ensure that the survey work is conducted as required. If the Planning Division confirms that the HABS III survey is not conducted as required, enforcement actions may be enacted in accordance with § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

Monitoring and Reporting: The Planning Division and Cultural Heritage Board Program Staff maintains copies of the HABS III survey in the Project file. The Planning Division has the authority to inspect the property to ensure that the stabilization work is completed as required. If the Planning Division confirms that the documentation requirements have not been implemented as approved, enforcement actions may be enacted in accordance with § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

Mitigation Measure CULTURAL MM-2 – Screening and Landscaping Plan

Purpose: To ensure that operational impacts associated with the project do not have an adverse effect on the western Santa Clara Valley and the Edwards Ranch-Orchard Farm, unlisted rural historic landscape districts, identified as eligible for listing within the National Register of Historic Places under Criterion A and Criterion C and to comply with the County's landscaping and screening requirements.

Requirement: In addition to standard requirements for landscaping and screening, the Permittee shall prepare a landscape plan that details. Installation of the approved landscaping.

The Permittee shall retain a landscape architect to prepare a landscape plan that complies with the requirements of this condition and the “Ventura County Landscape Design Criteria” (1992).

Landscaping Objectives: The Permittee must install and maintain landscaping and screening that serves the following functions:

- a. Screens undesirable views, incompatible land uses or uses in natural settings. The Permittee must install landscaping and screening to screen the Administrative Building, Material Processing Buildings, Maintenance and Packing Buildings, parking area, open windrow composting areas, heavy equipment, materials loading areas, mechanical heating and cooling equipment, water tanks and other site equipment from State Route 126.
- b. Provides visual relief and visual integration with the surrounding agricultural use and the historic use of the site for citriculture. The Permittee must install landscaping that integrates the structures with their surrounding agricultural land uses.
- c. Ensures compatibility with community character. The Permittee must install landscaping that visually integrates the development with the character of the surrounding community.
- d. Compliance with the California Department of Water Resources Model Water Efficient Landscape Ordinance. The Permittee must install landscaping that complies with the requirements of the California Department of Water Resources’ Model Water Efficient Landscape Ordinance, which is available on-line at: <http://www.water.ca.gov/wateruseefficiency/landscapeordinance/>.
- e. Provide appropriate screening measures from the historic district and landmark in such a manner as to minimize its visual impact upon the district and historic landmark, subject to review and approval of Cultural Heritage Board Program Staff’s review and approval. The landscape plan shall incorporate and identify an appropriate mix of box specimen trees (representative of the historic citriculture use of the site), shrubs and perimeter fencing around the CUP Boundary to meet the objective of this screening requirement.

Landscaping Design: The Permittee shall design all landscaping such that the landscaping requires minimal amounts of water and uses required water efficiently, in accordance with the water efficiency requirements of the Landscape Design Criteria and the California Department of Water Resources Model Water Efficient Landscape Ordinance, and must achieve the following design objectives:

- a. Use Available Non-potable Sources of Water. The landscaping must involve the harvesting and/or use of alternative, non-potable sources of water, including stormwater, reclaimed water, and gray water, if available to the Project site.
- b. Protection of Solar Access. The Permittee must design the landscaping to avoid the introduction of vegetation that would now or in the future cast substantial shadow on existing solar collectors or photovoltaic cells, or impair the function of a nearby building using passive solar heat collection.
- d. Create Viable Growing Environment. The landscape design must address the needs of the plants to ensure their health, long-term viability, and protection.
- e. Species Diversity. The landscape plan must integrate a variety of plant species, heights, colors, and textures, as appropriate given the size of the landscape.
- h. Use Non-Invasive Plant Species.

Financial Security: The Permittee shall:

- a. Post a financial assurance to cover the costs of planting and maintaining the required landscaping for 1-year period. The financial assurance may consist of cash, a time certificate of deposit, letter of credit, or bond in a form satisfactory to the Planning Director. The amount of the financial assurance must be based upon cost estimates in the approved landscape plan. The financial assurance shall designate the Ventura County Planning Division as the beneficiary of the instrument.

Upon satisfactory completion of the provisions of the landscape and screening plan for which the financial assurance is made, the County of Ventura can reassign the financial assurance to the Permittee upon request. If the Permittee fails to carry out the provisions of the landscape plan, the County may use the financial assurance to pay the costs associated with correcting the failure. If the amount of the financial assurance exceeds the cost and expense incurred by the County, the County may refund the Permittee the remaining balance. If the amount of the financial assurance is less than the cost and expense incurred by the County for the offsets, the Permittee shall be liable to the County for the difference.

- b. Reimburse the County for staff and/or consultant costs to monitor compliance with the approved landscape plan. Planning Division staff time and consultant costs to monitor compliance will be billed to the Condition Compliance account for the Project. (See Condition No. [insert the condition number for the condition that discusses the Condition Compliance account].)

Documentation: The Permittee shall submit three sets of a draft landscape plan to the Planning Division for review and approval. The draft landscape plan is subject to review and approval of Cultural Heritage Board Program. 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 (above), § 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.

The landscape plan shall include an estimate of the costs to install and maintain the required landscaping for 1-year. The Permittee shall submit the required financial assurance to the Planning Division.

Timing: The Permittee shall submit the landscape plan to the Planning Division for review and approval 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).

The Permittee shall submit the required financial assurance prior to the issuance of a Zoning Clearance for construction. The financial assurance may be released 1-year after landscape installation if the Planning Division determines that the landscaping is in substantial conformance with the approved landscape plan.

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 statement by the landscape architect 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. Operations maintains copies of the financial documentation submitted by the Permittee.

Residual Impacts:

With the implementation of Mitigation Measures CULTURAL MM-1, and CULTURAL MM-2, project-specific impacts, as well as the proposed project's contribution to significant cumulatively considerable impacts to historic cultural resources will be reduced to a less than significant level.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
9. Coastal Beaches and Sand Dunes								
Will the proposed project:								
a) Cause a direct or indirect adverse physical change to a coastal beach or sand dune, which is inconsistent with any of the coastal beaches and coastal sand dunes policies of the California Coastal Act, corresponding Coastal Act regulations, Ventura County Coastal Area Plan, or the Ventura County General Plan Goals, Policies and Programs?	X				X			
b) When considered together with one or more recently approved, current, and reasonably foreseeable probable future projects, result in a direct or indirect, adverse physical change to a coastal beach or sand dune?					X			
c) Be consistent with the applicable General Plan Goals and Policies for Item 9 of the Initial Study Assessment Guidelines?	X							

9. Coastal Beaches and Sand Dunes Impact Discussion:

9a and 9b. The project site is located approximately 8.5 miles east of the Pacific Ocean and, at that distance, the proposed project does not have the potential to adversely impact a coastal beach or sand dune. Therefore, the proposed project will not create a project specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact, to coastal beaches or sand dunes.

9c. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for item 9 of the Ventura County Initial Study Assessment Guidelines.*

Mitigation/Residual Impact(s)

No significant Impacts on coastal beaches and sand dunes have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
10. Fault Rupture Hazard (PWA)								
Will the proposed project:								
a) Be at risk with respect to fault rupture in its location within a State of California designated Alquist-Priolo Special Fault Study Zone?	X							
b) Be at risk with respect to fault rupture in its location within a County of Ventura designated Fault Hazard Area?	X							
c) Be consistent with the applicable General Plan Goals and Policies for Item 10 of the Initial Study Assessment Guidelines?	X				X			

10. Fault Rupture Hazard (PWA) Impact Discussion:

Fault rupture hazard will impact each project individually. No cumulative fault rupture hazard would occur as a result of other projects. Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

10a. and 10b. There are no known active or potentially active faults extending through the proposed project based on State of California Earthquake Fault Zones in accordance with the Alquist Priolo Earthquake Fault Zoning Act, and Ventura County General Plan Hazards Appendix - Figure 2.2.3b. Furthermore, no habitable structures are proposed at this time within 50 feet of a mapped trace of an active fault. There is no impact (N) from potential fault rupture hazard. Therefore, the proposed project will not result in a project-specific impact from potential fault rupture hazard. There is no known cumulative fault rupture hazard impact that will occur as a result of other approved, proposed, or probable projects.

10c. The project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 10 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on fault rupture hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
11. Ground Shaking Hazard (PWA)								
Will the proposed project:								
a) Be built in accordance with all applicable requirements of the Ventura County Building Code?		X			X			
b) Be consistent with the applicable General Plan Goals and Policies for Item 11 of the Initial Study Assessment Guidelines?						X		

11. Ground Shaking Hazard (PWA) Impact Discussion:

The hazards from ground shaking will affect each project individually. No cumulative ground shaking hazard would occur as a result of other projects. Any discussion of potential impacts from ground shaking is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

11a. The property will be subject to moderate to strong ground shaking from seismic events on local and regional fault systems. The County of Ventura Building Code adopted from the California Building Code, requires structures be designed to withstand this ground shaking. The seismic design parameters are provided by the Update of Geotechnical Engineering Report, prepared by Earth Systems, Inc., dated May 17, 2017, page 4 and 5. These parameters may need to be updated to the building code in effect at the time the application for a building permit is submitted. The requirements of the building code will reduce the effects of ground shaking to less than significant (LS). The hazards from ground shaking will affect each project individually, and no cumulative ground shaking hazard will occur as a result of other approved, proposed, or probable projects.

11b. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 11 of the Ventura County Initial Study Assessment Guidelines*.

Therefore, the project is consistent with the applicable General Plan Goals and Policies for Item 11 of the Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s)

No significant Impacts on ground shaking hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
12. Liquefaction Hazards (PWA)								
Will the proposed project:								
a) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving liquefaction because it is located within a Seismic Hazards Zone?		X						
b) Be consistent with the applicable General Plan Goals and Policies for Item 12 of the Initial Study Assessment Guidelines?		X				X		

12. Liquefaction Hazards (PWA) Impact Discussion:

The hazards from liquefaction will affect each project individually. No cumulative liquefaction hazard would occur as a result of other projects. Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

12a. The property is located within a potential liquefaction zone based on the Ventura County General Plan Hazards Appendix – Figure 2.4b. This map is a compilation of the State of California Seismic Hazards Maps for the County of Ventura and was used as the basis for delineating the potential liquefaction hazards within the county. The Update Geotechnical Engineering Report, prepared by Earth Systems, dated May 17, 2017 concludes that the soil profile will experience liquefaction and or seismically-induced settlements during a strong seismic event. The report documents as much as 11 inches of settlement in the vicinity of Boring Number 6 (CPT or cone penetrometer test) and between 0.1 and 4.0 inches for the 9 other boring locations (Page 6). These settlements may be mitigated 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 are considered to be less than significant because the impacts can be address through the . The hazards from liquefaction will affect each project individually, and no cumulative liquefaction hazard will occur as a result of other approved, proposed, or probable projects.

12b. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 12 of the Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on liquefaction hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
13. Seiche and Tsunami Hazards (PWA)								
Will the proposed project:								
a) Be located within about 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir?	X							
b) Be located in a mapped area of tsunami hazard as shown on the County General Plan maps?	X							
c) Be consistent with the applicable General Plan Goals and Policies for Item 13 of the Initial Study Assessment Guidelines?	X				X			

13. Seiche and Tsunami Hazards (PWA) Impact Discussion:

The hazards from seiche and tsunami will affect each project individually. No cumulative seiche and tsunami hazard would occur as a result of other projects. Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

13a. The site is not located adjacent to a closed or restricted body of water based on aerial imagery review (photos dated October 21, 2017, aerial imagery is under the copyrights of Pictometry, Source: Pictometry©, 2017) and is not subject to seiche hazard. There is no hazard from potential seiche and no impact to the proposed project. Therefore, the proposed project will not have a project-specific impact related to potential seiche hazard. The hazards from seiche will affect each project individually, and no cumulative seiche hazard will occur as a result of other approved, proposed, or probable projects.

13b. The project is not mapped within a tsunami inundation zone based on the Ventura County General Plan, Hazards Appendix, Figure 2.6, dated October 22, 2013. There is no impact (N) from potential hazards from tsunami. Therefore, the proposed project will not have a project-specific impact related to tsunami hazards. The hazards from tsunami will affect each project individually, and no cumulative tsunami hazard will occur as a result of other approved, proposed, or probable projects.

13c. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 13 of the Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant seiche or tsunami Hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
14. Landslide/Mudflow Hazard (PWA)								
Will the proposed project:								
a) Result in a landslide/mudflow hazard, as determined by the Public Works Agency Certified Engineering Geologist, based on the location of the site or project within, or outside of mapped landslides, potential earthquake induced landslide zones, and geomorphology of hillside terrain?	X							
b) Be consistent with the applicable General Plan Goals and Policies for Item 14 of the Initial Study Assessment Guidelines?	X				X			

14. Landslide/Mudflow Hazard (PWA) Impact Discussion:

The hazards from landslides/mudslides will affect each project individually. No cumulative landslide/mudslide hazard would occur as a result of other projects. Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

14a. The site is not located in a mapped landslide, not located within a hillside area, and is not located in a potential seismically induced landslide zone, based on analysis conducted by the California Geological Survey as part of California Seismic Hazards Mapping Act, 1991, Public Resources Code Sections 2690 2699.6. The project does not include any excavations into a hillside. There are no impacts (N) to the project resulting from landslide hazard. The hazards from landslides/mudslides will affect each project individually. No cumulative landslide/mudslide hazard would occur as a result of other projects.

14b. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 14 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s): No significant Impacts on landslide and mudflow hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
15. Expansive Soils Hazards (PWA)								
Will the proposed project:								
a) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving soil expansion because it is located within a soils expansive hazard zone or where soils with an expansion index greater than 20 are present?		X						
b) Be consistent with the applicable General Plan Goals and Policies for Item 15 of the Initial Study Assessment Guidelines?		X			X			

15. Expansive Soils Hazards (PWA) Impact Discussion:

The hazards from expansive soils will affect each project individually. No cumulative expansive soils hazard would occur as a result of other projects. Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

15a. The expansion range of the soils in the project area will be mitigated to less than significant by implementation of the Ventura County Building Code. The Update Geotechnical Engineering Report, prepared by Earth Systems, dated May 17, 2017,

recommends foundations into future compacted fill be designed for medium expansive soils conditions (Attachment 9, page 17). Future development of the site will be subject to the requirements of the County of Ventura Building Code adopted from the California Building Code, dated 2016, Section 1803.5.3 that require mitigation of potential adverse effects of expansive soils. These parameters may need to be updated to the building code in effect at the time the application for a building permit is submitted. The hazard associated with adverse effects of expansive soils is considered to be less than significant (LS). The hazards from expansive soils will affect each project individually. No cumulative expansive soils hazard would occur as a result of other projects.

15b. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 15 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on expansive soil hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
16. Subsidence Hazard (PWA)								
Will the proposed project:								
a) Expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving subsidence because it is located within a subsidence hazard zone?		X						
b) Be consistent with the applicable General Plan Goals and Policies for Item 16 of the Initial Study Assessment Guidelines?		X			X			

16. Subsidence Hazard (PWA) Impact Discussion:

The subsidence hazards will affect each project individually. No cumulative subsidence hazard would occur as a result of other projects. Any discussion of potential impacts of seismic and geologic hazards to the proposed project is provided for informational purposes only and is neither required by CEQA nor subject to its requirements.

16a. The project site is located within the probable subsidence hazard zone as delineated on the Ventura County General Plan Hazards Appendix Figure 2.8 (October

22, 2013). 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 is not for oil, gas or groundwater extraction and the effects of the project on subsidence are less than significant. Therefore, the subsidence hazard is considered to be less than significant (LS). The hazards from subsidence will affect each project individually. No cumulative subsidence hazard would occur as a result of other projects.

16b. The proposed project is consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 16 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on subsidence hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
17a. Hydraulic Hazards – Non-FEMA (PWA)								
Will the proposed project:								
1) Result in a potential erosion/siltation hazard and flooding hazard pursuant to any of the following documents (individually, collectively, or in combination with one another): <ul style="list-style-type: none"> • 2007 Ventura County Building Code Ordinance No.4369 • Ventura County Land Development Manual • Ventura County Subdivision Ordinance • Ventura County Coastal Zoning Ordinance • Ventura County Non-Coastal Zoning Ordinance • Ventura County Standard Land Development Specifications • Ventura County Road Standards • Ventura County Watershed Protection District Hydrology Manual • County of Ventura Stormwater Quality Ordinance, Ordinance No. 4142 • Ventura County Hillside Erosion Control Ordinance, Ordinance No. 3539 and Ordinance No. 3683 • Ventura County Municipal Storm Water NPDES Permit • State General Construction Permit • State General Industrial Permit • National Pollutant Discharge Elimination System (NPDES)? 		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 17A of the Initial Study Assessment Guidelines?		X				X		

17a. Hydraulic Hazards – Non-FEMA (PWA) Impact Discussion:

17a 1. There is an increase in impervious area proposed by the project. No increase in flooding hazard or potential for erosion or siltation will occur as a result of the proposed project as the increase in runoff will be collected and detained in proposed stormwater impoundments (Regional and Local Hydrology Study, Attachment 14, April 2017, page

12). Any future development will be completed according to current codes and standards that will require no increase in flooding hazard or increase in the potential for erosion or siltation.

17a 2. The proposed project is consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 17a of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on non-FEMA hydraulic hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
17b. Hydraulic Hazards – FEMA (WPD)								
Will the proposed project:								
1) Be located outside of the boundaries of a Special Flood Hazard Area and entirely within a FEMA-determined 'X-Unshaded' flood zone (beyond the 0.2% annual chance floodplain: beyond the 500-year floodplain)?		X				X		
2) Be located outside of the boundaries of a Special Flood Hazard Area and entirely within a FEMA-determined 'X-Shaded' flood zone (within the 0.2% annual chance floodplain: within the 500-year floodplain)?		X				X		
3) Be located, in part or in whole, within the boundaries of a Special Flood Hazard Area (1% annual chance floodplain: 100-year), but located entirely outside of the boundaries of the Regulatory Floodway?		X				X		
4) Be located, in part or in whole, within the boundaries of the Regulatory Floodway, as determined using the 'Effective' and latest available DFIRMs provided by FEMA?		X				X		
5) Be consistent with the applicable General Plan Goals and Policies for Item 17B of the Initial Study Assessment Guidelines?		X				X		

17b. Hydraulic Hazards – FEMA (WPD) Impact Discussion:

17b-1. through 17b-4. The proposed project is not located in a Federal Emergency Management Agency (FEMA) 1% annual chance (100-year) floodplain as evidenced on FEMA digital Flood Insurance Rate Map 06111C0770E, and 06111C0790E effective January 20, 2010. The project site is in “Zone X Unshaded” areas (i.e., outside of the 100-year floodplain). However, offsite flows from Todd Barranca as determined in the Hydrologic and Hydraulic (H&H) analysis (Attachment 14, Harrison Industries, November 2018) would be higher than one foot above the landside finished grade of the proposed retaining wall along the east side of the development (see Plan Sheets 19 and 20). This creates a leveed condition and therefore the retaining wall must be designed as a flood wall and meet the guidelines for levee design as delineated by the Army Corp of Engineers.

The project proponent will be required to submit final versions of the “Regional & Local Hydrology Study” (Attachment 14) prepared by Harrison and the “Hydrologic and Hydraulic (H&H) Report Todd Barranca” prepared by NextGen and all source model files used to support the study’s findings. The Regional & Local Hydrology Study will be required to be updated to remove any statement of the District as the owner of the adjacent trapezoidal channel. Based on the District’s database of facilities, this channel is not owned by the District.

It has been determined that the proposed project design with the conditions mentioned above mitigates the direct and indirect project-specific and cumulative impacts. Therefore, it is staff’s position that the project impact on the flood hazard is “Less than Significant”.

17b 5. As stated above, the project site is located outside of the 1% annual chance (100-year) floodplain as evidenced on the latest effective DFIRM and, therefore, will be consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 17b of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on FEMA hydraulic hazards have been identified; therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
18. Fire Hazards (VCFPD)								
Will the proposed project:								
a) Be located within High Fire Hazard Areas/Fire Hazard Severity Zones or Hazardous Watershed Fire Areas?		X				X		
b) Be consistent with the applicable General Plan Goals and Policies for Item 18 of the Initial Study Assessment Guidelines?		X				X		

18. Fire Hazards (VCFPD) Impact Discussion:

18a. The subject property is not located within a High Fire Severity Zone. Fire Station 26, located at 536 West Main Street, Santa Paula, is 5.5 miles northeast of the project site. The proposed project will comply with all applicable Federal and State regulations and the requirements of the Ventura County Building Code and Ventura County Fire Code. The proposed project will be subject to conditions of approval to ensure the project is in conformance with current California State Law and the Ventura County Fire Code. Therefore, the proposed project will not create a project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative fire hazards impact.

18b. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 18 of the Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on fire hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
19. Aviation Hazards (Airports)								
Will the proposed project:								
a) Comply with the County's Airport Comprehensive Land Use Plan and pre-established federal criteria set forth in Federal Aviation Regulation Part 77 (Obstruction Standards)?	X				X			
b) Will the proposed project result in residential development, a church, a school, or high commercial business located within a sphere of influence of a County airport?	X				X			
c) Be consistent with the applicable General Plan Goals and Policies for Item 19 of the Initial Study Assessment Guidelines?	X				X			

19. Aviation Hazards (Airports) Impact Discussion:

19a. and 19b. The proposed project will not involve any obstruction to navigable airspace, as all reasonably foreseeable future development on-site will be limited to a maximum of 35 feet. Additionally, the proposed project is not located within the sphere of influence of any County airport. The nearest County airport, Santa Paula, is 4.5 miles to the northeast of the project site. The proposed project will 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); the proposed project does not involve any of the construction activities which require notification under FAR Sec. 77.9. Additionally, the proposed project will not result in residential development, a church, a school, or a high commercial business within the sphere of influence of the Santa Paula Airport. Therefore, the proposed project will not create a project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact related to aviation hazards.

19c. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 19 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s):

No significant Impacts on aviation hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
20a. Hazardous Materials/Waste – Materials (EHD/Fire)								
Will the proposed project:								
1) Utilize hazardous materials in compliance with applicable state and local requirements as set forth in Section 20a of the Initial Study Assessment Guidelines?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 20a of the Initial Study Assessment Guidelines?		X				X		

20a. Hazardous Materials/Waste – Materials (EHD/Fire) Impact Discussion:

20a 1. The site is currently occupied by a 15-acre agricultural material composting operation. The use of hazardous materials at the facility is incidental to the proposed primary land use of the site as a Large-Scale Commercial Organics Processing Operation. Incoming feedstock will contain minimal household hazardous waste and other contaminants, as screened by the commercial generators (source separated) and inspected by the facility operator in compliance with NCZO Section 8107-36.4.1(h). The existing operation maintains an active permit to operate (permit number FA0010148) issued by Ventura County Environmental Health Division (EHD)/Certified Unified Program Agency (CUPA). Incidental handling of hazardous materials is expected to include:

Table 20a.-1

Name of Material	Physical State	DOT Hazard Class	IBC/IFC Hazard Class	Largest Container	Maximum Quantity
Diesel Fuel	Liquid	Class III Combustible Liquid	Class II Combustible Liquid	500 gallons	500 gallons
Unleaded Gasoline	Liquid	Class III Flammable Liquid	Class 1B Flammable Liquid	55 gallons	110 gallons
Motor Oil	Liquid	Class III Combustible Liquid	Class IIIB Combustible Liquid	55 gallons	250 gallons
Hydraulic Oil	Liquid	Not Regulated	Class IIIB Combustible Liquid	55 gallons	110 gallons
Transmission Oil	Liquid	Not Regulated	Class IIIB Combustible Liquid	55 gallons	110 gallons
Glycol Based Coolant	Liquid	Not Regulated	Class IIIB Combustible Liquid	55 gallons	110 gallons

Acetylene	Compressed Gas	Class 2.1 Flammable Gas	Flammable Gas	107 ft ³	214 ft ³
Oxygen	Compressed Gas	Class 2.2 Non-Flammable Gas	Oxidizer	280 ft ³	560 ft ³
Propane	Liquid	Class 2.1 Flammable Gas	Flammable Gas	10 gallons	50 gallons

A Hazardous Materials Business Plan (HMBP) for reportable hazardous materials was electronically submitted to the California Environmental Reporting System (CERS) on February 20, 2019, (CERS ID 10337200). The proposed project would involve an increase of, addition to, and relocation of hazardous materials. The Permittee will be required to update the HMBP in CERS to remain in compliance with state law. Improper storage, handling, and disposal of potentially hazardous materials may result in the creation of adverse impacts to the environment. Hazardous materials will be stored inside the proposed maintenance building in compliance with the applicable State and local regulations. Compliance with applicable state and local regulations will reduce potential project specific impacts to less than significant levels.

20a 2. The proposed project is consistent with the *Ventura County General Plan Goals and Policies* for Item 20a of the *Ventura County Initial Study Assessment Guidelines*, provided the business maintains compliance with all applicable laws and regulations related to hazardous materials handling, storage, and disposal.

Mitigation/Residual Impact(s)

No significant impacts on hazardous materials/waste have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
20b. Hazardous Materials/Waste – Waste (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 20b of the Initial Study Assessment Guidelines?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 20b of the Initial Study Assessment Guidelines?		X				X		

20b. Hazardous Materials/Waste – Waste (EHD) Impact Discussion:

20b 1. The site is currently occupied by a 15-acre agricultural material composting operation. The existing operation maintains an active hazardous waste generator permit from Ventura County Environmental Health Division/Certified Unified Program Agency (FA0010148), and an active hazardous waste generator EPA ID number issued by Department of Toxic Substances Control (CAL000297304). The proposed project will generate hazardous waste in the form of waste oil from equipment and vehicle maintenance activities as well as other incidental waste materials. The materials are listed below. Improper storage, handling, and disposal of hazardous wastes may result in the creation of adverse impacts to the environment. Compliance with applicable Federal, state and local regulations will reduce potential project specific and cumulative impacts to a level considered less than significant.

Table 20b.-1

Waste	Physical State	Largest Container	Maximum Quantity
Waste Motor Oil	Liquid	55 gallons	110 gallons
Waste Antifreeze	Liquid	55 gallons	110 gallons
Waste Absorbent	Solid (soils or absorbent)	One 55 gallon drum (250 pounds)	2 drums (500 pounds)

20b 2. The proposed project is consistent with the *Ventura County General Plan Goals and Policies for Item 20b of the Ventura County Initial Study Assessment Guidelines* provided the business maintains compliance with state and local laws as it relates to hazardous waste storage, handling, and disposal.

Mitigation/Residual Impact(s)

No significant impacts on hazardous materials/waste have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	L S	PS-M	PS	N	LS	PS-M	PS
21. Noise and Vibration								
Will the proposed project:								
a) Either individually or when combined with other recently approved, pending, and probable future projects, produce noise in excess of the standards for noise in the Ventura County General Plan Goals, Policies and Programs (Section 2.16) or the applicable Area Plan?			X				X	
b) Either individually or when combined with other recently approved, pending, and probable future projects, include construction activities involving blasting, pile-driving, vibratory compaction, demolition, and drilling or excavation which exceed the threshold criteria provided in the Transit Noise and Vibration Impact Assessment (Section 12.2)?			X				X	
c) Result in a transit use located within any of the critical distances of the vibration-sensitive uses listed in Table 1 (Initial Study Assessment Guidelines Section 21)?	X				X			
d) Generate new heavy vehicle (e.g., semi-truck or bus) trips on uneven roadways located within proximity to sensitive uses that have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria of the Transit Use Thresholds for rubber-tire heavy vehicle uses (Initial Study Assessment Guidelines, Section 21)?			X				X	
e) Involve blasting, pile-driving, vibratory compaction, demolition, drilling, excavation, or other similar types of vibration-generating activities which have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria provided in the Transit Noise and Vibration Impact Assessment [Hanson, Carl E., David A. Towers, and Lance D. Meister. (May 2006) Section 12.2]?			X				X	
f) Be consistent with the applicable General Plan Goals and Policies for Item 21 of the Initial Study Assessment Guidelines?			X				X	

21. Noise and Vibration Impact Discussion:

21a., 21b., 21d., and 21e. The proposed project is a request to expand an existing compost facility to a large-scale commercial organics processing operation. The facility will expand from 15 acres to 70 acres. The proposed project will involve the construction of buildings and site improvements and the operation of land uses that will generate noise and vibration. Once constructed, the facility will process 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). The following summary was obtained from the Noise Impact Assessment (Attachment 15, Sespe Consulting, March 2017) provided by the Applicant and lists the estimated noise and vibration generating activities associated with the operation of the proposed facility.

Outdoor Processing (i.e. open windrows)

- Chippers/Grinders
- Trommel Screens
- Loaders/Excavators/Backhoes
- Water/Dump Trucks
- Pile Turners
- Forklifts

Covered Aerated Static Piles (CASP)

- Blower/Fan Group

Anaerobic Digesters (AD)

- Internal Combustion Engine Exhaust

Windrow composting: Noise generating equipment utilized for open windrow composting will operate during daylight hours (sunrise-sunset) only.

CASPs: The primary noise source associated with the CASP system is the blower/fan group that powers the in-floor aeration system. The CASP system will operate 24-hours per day.

AD units: The primary noise source associated with the AD system is the internal combustion engine and exhaust, which are part of the biogas collection system. All four proposed AD units will connect to a single combined heat and power (CHP) engine located on the utility pad on the southern portion of the facility (Figure 3, Appendix A). The AD units will operate 24-hours per day.

Table 21-1

Operation/Activity	Existing Operations		Proposed Operations	
	Operation)		Processing	
	Days of the Week	Hours of Operation	Days of the Week	Hours of Operation
Waste Receiving	Mon. – Fri.	6:00 AM – 6:00 PM	Mon. – Sat.	7:00 AM – 5:00 PM
Outdoor Processing	Mon. – Fri.	6:00 AM – 6:00 PM	Mon. – Sun.	Sunrise to Sunset
Material Processing Buildings ⁶	---	---	Mon. – Sun.	6:00 AM – 10:00 PM
Packaging	---	---	Mon. – Sat.	6:00 AM – 10:00 PM
Maintenance	---	---	Mon. – Sat.	7:00 AM – 5:00 PM
Office	---	---	Mon. – Fri.	7:00 AM – 5:00 PM

Construction-related activities are estimated to last 8 weeks. Noise generating construction equipment includes graders excavators, dozer, back hoes, front-end/skid steer loaders, and dump trucks. The summary of construction activities provided in the Noise Impact Assessment are as follows:

- Demolition (14 Days): Approximately 55 acres of the Project site is currently active orchards and row crops, which will need to be removed to accommodate the expanded Project. Portions of the existing 15-acre compost facility will also need to be demolished/cleared.
- Site Preparation (21 Days): Existing compost equipment and areas not demolished will be temporarily relocated to allow for the construction of the new facility structures and compost working surfaces.
- Grading (28 Days): The Project area is nearly flat, however minor grading will be required across the entire 70-acre site to establish final grade. Additionally,

⁶ Material Processing & Packaging operations will occur indoors within enclosed structures (Attachment 2)

two (2) retention basins will be excavated along the southern boundary of the project site. A system of underground storm drains connecting to the basins will also be constructed.

- Building Construction (90 Days): The following building will be constructed: Dry Organics and Wet Organics Buildings, Facilities Administration Building, Production Building (i.e. Packaging Building), and Maintenance Building. Ancillary equipment such as the CASP, AD systems, scale house, staging pads, tipping areas, and utility structures (e.g. utility pad and transformers) will also be installed during the building phase. Working surfaces will be treated with cement in the open windrow composting areas .
- Architectural Coatings (60 Days): Following construction of the buildings, painting and finishing of surfaces will occur.
- Paving (21 Days): A large portion of the site will be paved with either cement or asphalt concrete to accommodate vehicle and equipment operations. Parking spaces for employees and visitors will be installed adjacent to the scale house near the facilities administration and maintenance buildings.

Construction activities that generate noise will be restricted to daytime hours only, as defined by Ventura County's *Construction Noise Threshold Criteria and Control Plan* (7:00 AM - 7:00 PM Monday through Friday, 9:00 AM - 7:00 PM Weekends/Holidays).

In order to determine whether a project will result in a significant noise impact, the Ventura County *Initial Study Assessment Guidelines* set forth standards to determine whether the proposed use is a "noise sensitive use" or a "noise generator." Noise sensitive uses include, but are not limited to, dwellings, schools, hospitals, nursing homes, churches and libraries. The proposed project, consisting of a commercial composting operation, is considered a noise generator.

The proposed project is located approximately ¼ mile south from Highway 126 and is outside the CNEL 60dB(A) noise contour (RMA GIS Viewer, Noise Contour Maps, 2019). However, the proposed project site is located 4.5 miles west of the Santa Paula Airport. Therefore, the proposed project will not be subject to noise from these noise generators.

Existing facility operations and existing road, railroad and airplane traffic are considered baseline for the proposed project.

Nine noise sensitive receptors (i.e. dwellings, schools, hospitals, nursing homes, churches, etc.) were identified in the Noise Impact Assessment. The receptors considered in the Noise Impact Assessment are described below:

- **Receptor 1 (R1)** is the residential dwelling located 650 feet to the southwest of the Project site. This residence and the surrounding property are owned by

Limoneria and leased out to farm workers employed in their nearby agricultural fields.

- **Receptor 2 (R2)** is the residential dwelling located immediately (40 feet) south of the Project site. This small residence and the surrounding property are owned by Limoneria and leased out to farm workers employed in their nearby agricultural fields.
- **Receptor 3 (R3)** is the residential dwelling located 150 feet to the southeast of the Project site. This residence and the surrounding property is owned by Limoneria and leased out to farm workers employed in their nearby agricultural fields.

Receptor 1 (R1) through Receptor 3 (R3) are the closest noise sensitive receptors, conservatively accounting for potential noise impacts for locations farther from the identified construction and operational noise sources. Receptor 4 (R4) through Receptor 9 (R9) were analyzed for noise impacts related to the increase in vehicle traffic along the proposed project haul routes:

- **Receptor 4 (R4)** is the Briggs School (1.94 miles northeast of the project site) located at the southeast corner of Briggs Road and Telegraph Road intersection, along the proposed Project haul route. This school serves elementary and middle school children (K-8).
- **Receptor 5 (R5)** is the privately-owned residential dwelling located adjacent to the southwest corner of the Todd Road and Telegraph Road intersection, along the proposed Project haul route (1 mile to the northeast of the project site). Noise impacts at this receptor are meant to represent worst-case impacts for other residences along this portion of the Project haul route.
- **Receptor 6 (R6)** is the privately-owned residential dwelling located to the southeast of the Telegraph Road and Edwards Ranch Road intersection, along the proposed Project haul route (0.64 miles to the north of the project site). Noise impacts at this receptor are meant to represent worst-case impacts for other residences along this portion of the Project haul route.
- **Receptor 7 (R7)** is the privately-owned residential dwelling located to the northeast of the Telegraph Road and Edwards Ranch Road intersection, along the proposed Project haul route (0.77 miles to the north of the project site). Noise impacts at this receptor are meant to represent worst-case impacts for other residences along this portion of the Project haul route.
- **Receptor 8 (R8)** collectively represents the group of residences southeast of the Telegraph Road and Wells Road intersection, along the proposed Project haul route (1.91 mile west of the project site). The residence within this housing tract nearest to this intersection, specifically located at the north end

of Camelia Way, was assessed. Noise impacts at this receptor are meant to represent worst-case impacts for other residences along this portion of the Project haul route. Please note that an approximately 4-foot wall exists between this group of receptors and Telegraph Road (Figures 6 & 7, Appendix A).

- **Receptor 9 (R9)** is the Palms at Bonaventure Assisted Living & Memory Care facility northwest of the Telegraph Road and Wells Road intersection, along the proposed Project haul route (2.15 miles west of the project site). Noise impacts at this receptor are meant to represent worst-case impacts for other residences along this portion of the Project haul route.

The Noise Impact Assessment finds noise associated with operation of the proposed project will remain less than significant as indicated in Table 21-2 Industrial Noise Source Impacts (below):

**Table 21-2
Industrial Noise Source Impacts (Leq-Hr dBA)**

Parameter	Receptor 1 (R1)			Receptor 2 (R2)			Receptor 3 (R3)		
	Day	Evening	Night	Day	Evening	Night	Day	Evening	Night
Baseline Noise Level	51.8	43.0	45.1	46.4	37.6	39.7	44.0	35.2	37.3
Project Noise Level	24.9	0.0	0.0	30.7	17.0	17.0	23.0	7.1	7.1
Total Noise Level	51.9	43.0	45.1	46.6	37.6	39.7	44.1	35.2	37.3
Threshold	55.0	50.0	48.1	55.0	50.0	45.0	55.0	50.0	45.0
Significant?	No	No	No	No	No	No	No	No	No

The Noise Impact Assessment also finds that traffic noise associated with the haul route for the proposed project will does not exceed the outdoor noise level threshold of Leq(1hr): 65 dB(A) (defined in *Ventura County General Plan Policy 2.16.2-1(1)(b)*), indicated in Table 21-3, Total Traffic Noise Level and Significance Determination (below):

**Table 21-3
Total Traffic Noise Level and Significance Determination**

Parameter	Daytime Leq1H (dBA)					
	R4	R5	R6	R7	R8	R9
Baseline Noise Level	49.1	55.8	57.0	49.7	58.9	56.8
Project Noise Level	53.5	57.7	61.3	54.8	63.4	62.3
Total Noise Level	54.8	59.9	62.7	56.0	64.7	63.4
Significance	65.0	65.0	65.0	65.0	65.0	65.0
Significant?	No	No	No	No	No	No

No mitigation is required for operational impacts (traffic or industrial) as these were below the applicable significance thresholds.

For temporary construction impacts, facility-adjacent receptors (R1, R2, and R3) were found to be temporarily impacted by construction noise. The findings of the Noise Impact Assessment are summarized in the table below:

**Table 21-4
Project Construction Noise Impacts (dBA)**

Parameter	Receptor 1 (R1)		Receptor 2 (R2)		Receptor 3 (R3)	
	Leq	Lmax	Leq	Lmax	Leq	Lmax
Construction Noise Impact	54.1	63.0	66.1	75.0	58.7	67.6
Significance Threshold	55.0	75.0	55.0	75.0	55.0	75.0
Significant?	No	No	Yes	Yes	Yes	No

Note: Noises impacts shown above were calculated for the grading construction phase, which represents the construction phase with the highest expected noise impacts.

The Ventura County Construction Noise Threshold Criteria and Control Plan (NTC, 2010) specifies the specific construction noise limits for noise sensitive locations. The applicant will be subject to compliance with the NTC and no evening or nighttime construction activities will occur. The daytime construction noise threshold criteria prescribed in the NTC vary by the duration of construction affecting noise sensitive receptors. Depending on project duration, the daytime noise threshold criteria shall be the greater of the fixed Leq(h) limit (which includes non-construction evening and nighttime noise) or the measured ambient Leq(h) plus 3 dB. In addition, the construction related, slow response, instantaneous maximum noise (Lmax) shall not exceed the noise threshold criteria by 20 dBA more than eight times per daytime hour, more than six times per evening hour and more than four times per nighttime hour. The project construction phase is anticipated to last 16 to 32 weeks. The closest relevant receptors in each direction from the Facility (i.e., R1, R2, and R3) are all residential dwellings. Referring again to 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, so long as Project construction activities occur during daytime hours only, the Project’s noise impacts at nearby Facility receptors would be considered less than significant. As described in the Mitigation measures NOISE MM-1 is defined below and address the temporary project impacts associated with the construction phase, addressing vehicle idling and the limitation on construction hours. With the formal implementation on the limitation of construction hours, project-related construction impacts will be less than significant.

21c. The proposed project does not include the development of a transit use which is located within the critical distances of vibration sensitive uses listed in Section 21 D, Table 1 of the Initial Study Assessment Guidelines. Therefore, no impact is estimated for this hazard category item and no further evaluation of this topic is required.

21f. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 21 of the *Ventura County Initial Study Assessment Guidelines*. Pursuant to the requirements for the *Ventura County General Plan Goals*,

Policies and Programs Policy 2.13.2-1(5), *Construction Noise Threshold Criteria and Control Plan* (2010a), this Initial Study evaluated the noise impacts of the proposed project and future development on the project site.

Mitigation/Residual Impact(s)

Mitigation Measure NOISE MM-1 – Construction Noise with Idling Restriction

Purpose: To ensure that construction activities are conducted in conformance with *Ventura County General Plan Noise Element* (Noise Element), the *Ventura County Initial Study Assessment Guidelines* (ISAGs), and *Ventura County’s Construction Noise Threshold Criteria and Control Plan* (Construction Guidelines)

Requirement: The Permittee shall limit construction activity for site preparation and development to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday, and from 9:00 a.m. to 7:00 p.m. Saturday, Sunday, and State holidays. Construction equipment maintenance shall be limited to the same hours. Construction equipment shall not idle for more than 30 minutes at any one time. Non-noise generating construction activities such as interior painting are not subject to these restrictions.

Documentation: The Permittee shall post a sign stating these restrictions in a conspicuous location on the Project site, in order so that the sign is visible to the general public. The Permittee shall provide photo documentation showing posting of the required signage to the Planning Division, prior to the commencement of grading and construction activities. The sign must provide a telephone number of the site foreman, or other person who controls activities on the jobsite, for use for complaints from the public. The Permittee shall maintain a “Complaint Log,” noting the date, time, complainant’s name, complaint, and any corrective action taken, in the event that the Permittee receives noise complaints. The Permittee must submit the “Complaint Log” to the Planning Division upon the Planning Director’s request.

Timing: The Permittee shall install the sign prior to the issuance of a building permit and throughout all grading and construction activities. The Permittee shall maintain the signage on-site until all grading and construction activities are complete. If the Planning Director requests the Permittee to submit the “Complaint Log” to the Planning Division, the Permittee shall submit the “Complaint Log” within one day of receiving the Planning Director’s request.

Reporting and Monitoring: The Planning Division reviews, and maintains in the Project file, the photo documentation of the sign and the “Complaint Log.” The Planning Division has the authority to conduct site inspections and take enforcement actions to ensure that the Permittee conducts grading and construction activities in compliance with this condition, consistent with the requirements of § 8114-3 of the Non-Coastal Zoning Ordinance.

Residual Impacts:

With implementation Mitigation Measures NOISE MM-1 project-specific impacts, as well as the proposed project's contribution to significant cumulatively considerable impacts to noise will be reduced to a less than significant level.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
22. Daytime Glare								
Will the proposed project:								
a) Create a new source of disability glare or discomfort glare for motorists travelling along any road of the County Regional Road Network?		X				X		
b) Be consistent with the applicable General Plan Goals and Policies for Item 22 of the Initial Study Assessment Guidelines?		X				X		

22. Daytime Glare Impact Discussion:

22a. The project site is situated in a rural area surrounded by lands in agricultural production and, to a lesser degree, very low density, rural residential development. The Santa Clara River is approximately ¼ mile south of the project site. The project site is not noticeably visible from Highway 126 but is visible from Edwards Ranch Road. The potential to create a new source of disability glare or discomfort glare for motorists is considered low, however, the proposed project will likely incorporate lighting that could have a significant impact on wildlife movement in and around the Santa Clara River, if it is excessive or shines into adjacent areas with native vegetation. Therefore, Mitigation Measure MM Bio MM-4 Outdoor Lighting/Glare, is proposed, which requires the Applicant to submit a lighting plan to the Planning Division for review and approval. Additionally, as discussed in Item 6 (above), the Applicant shall submit a materials sample/color board at the time of construction of the proposed commercial composting facility and shall utilize natural building materials and colors (earth tones and non-reflective paints) on exterior surfaces of all structures. Therefore, the project-specific glare impact will be less-than-significant, and the proposed project will not make a cumulatively considerable contribution to significant glare impacts.

22b. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 22 of the Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on daytime glare have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
23. Public Health (EHD)								
Will the proposed project:								
a) Result in impacts to public health from environmental factors as set forth in Section 23 of the Initial Study Assessment Guidelines?			X				X	
b) Be consistent with the applicable General Plan Goals and Policies for Item 23 of the Initial Study Assessment Guidelines?			X				X	

23. Public Health (EHD) Impact Discussion:

23a. The project site has been historically used for agricultural purposes and is presently cultivated with row crops and orchard plantings. The site is also occupied by the existing composting operation which currently occupies 15 acres of a 994-acre parcel. The proposed project is for the continued operation and expansion of the composting facility from 15 acres to 70 acres. The proposed project will also include the handling and composting of food waste. Public health impacts commonly associated with commercial organics composting activities include, but are not limited to, odors, dust and bioaerosols, and vectors. Vector control issues include breeding and/or harborage of insects (flies, mosquitoes, etc.) and rodents. The applicant submitted a Vector Control Plan (VCP) (Attachment 16, Agromin, February 2017) and Odor Impact Minimization Plan (OIMP) (Attachment 6, Agromin, February 2017) to analyze impacts related to these areas of concern. These documents are subject to final review under the regulations for Solid Waste Facilities (California Code of Regulations Title 27 and Title 14) under the permitting authority of the Local Enforcement Agency (LEA) (Environmental Health Division). As described in these plans, the permittee will employ a program of best available control measures and best management practices related to vector and odor control to address and eliminate potential public health impacts. The identified vector control measures include prompt screening/inspection of feedstock and processing. The identified odor control measures include processing of food material in a fully enclosed building and subject to negative pressure with air ventilated through bio-filters to control odor emissions. If the proposed project creates unforeseen vector, odor, etc. issues not addressed in any current plans, the approved programs may be modified to eliminate or add control measures, subject to approval by the LEA.

The proposed project has the potential to impact public health due to the use of an onsite wastewater treatment systems (OWTS). An OWTS that is undersized, improperly installed, failing, or poorly maintained has the potential to create a public nuisance and/or contaminate groundwater. Potential impacts can be reduced to less than significant with adherence to State and local OWTS regulations and proper maintenance of tanks and disposal fields. Septic tank 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 onsite storage and/or handling of hazardous materials and the generation of hazardous waste. Compliance with applicable hazardous materials and hazardous waste regulations will reduce potential project specific and cumulative impacts to a level considered less than significant. As discussed in Sections 29d of this Initial Study (below), to ensure the facility complies with California Code of Regulations Title 14, Section 17866 “General Design Requirements” and Section 17867 “General Operating Standards” for composting, recommended Mitigation Measure WASTE MM-1, requires the Permittee to provide written maintenance and operations plans identifying best management practices and specific control technologies for the operation and maintenance of the facility.

23b. The proposed project will be consistent with the *Ventura County General Plan* policies for Item 23 of the *Ventura County Initial Study Assessment Guidelines* provided the operator adheres to all applicable laws, regulations, and health and safety measures related to the operation of a composting facility, the installation and maintenance of an OWTS, and the storage and handling of hazardous materials and waste.

Mitigation/Residual Impact(s):

With the implementation of Mitigation Measure WASTE MM-1, project-specific impacts related to public health will be reduced to a less than significant level.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
24. Greenhouse Gases (VCAPCD)								
Will the proposed project:								
a) Result in environmental impacts from greenhouse gas emissions, either project specifically or cumulatively, as set forth in CEQA Guidelines §§ 15064(h)(3), 15064.4, 15130(b)(1)(B) and -(d), and 15183.5?		X				X		

24. Greenhouse Gases (VCAPCD) Impact Discussion:

24a. Neither APCD nor the County has adopted a threshold of significance applicable to Greenhouse Gas (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 (MTCO₂e/Yr) threshold of significance to industrial projects, in accordance with CEQA Guidelines Section 15064.4(a)(2). APCD has concurred with the County’s approach. APCD supports the application of this numeric threshold as stated in the GHG Threshold Report APCD published in 2011 at the request of the APCD Board, which concludes “Unless directed otherwise, District staff will continue to evaluate and develop suitable interim GHG threshold options for Ventura County with preference for GHG threshold consistency with the South Coast AQMD and the SCAG region”. The South Coast AQMD at the same time proposed an interim screening threshold of 3,000 MTCO₂e/Yr for commercial/residential projects. Industrial projects or facilities are defined as stationary emission sources that have or are required to have an APCD Permit to Operate.

The total incremental GHG emissions for the proposed project are -59,640 MTCO₂e/Yr, which is well below the 10,000 MTCO₂e/year recommended threshold of significance and results in a net GHG benefit. The Applicant submitted a report titled Air Quality, Climate Change Impact and Health Risk Assessment (Sespe Consulting, Inc., May 2017). According to the report, the project’s GHG emissions result in a net benefit to regional and local areas, as all food and waste material in West Ventura County (Camarillo, Ojai, Oxnard, Pt Hueneme, Ventura, Santa Paula, ½ of unincorporated) that would be going to landfills for disposal would be diverted to the project site for composting. This diverted offset-method is acceptable and used in certified EIRs across the state as the nature of the proposed increase in organic waste to project site is directly related to CalRecycle mandated requirements to divert organic waste away from landfills (SB 1383, 2016). In addition, 2019 CEQA Guidelines Section 15064.4(b) recommends focusing on a project’s reasonably foreseeable incremental contribution to the global effects of climate change. Diverting organic waste material to composting

operations (aerobic process) prevents methane (CH₄, a potent GHG) emissions from being generated in landfills (anaerobic process). Composting (rather than landfilling) one ton of yard trimmings can prevent the production of 0.2 metric tons of CO₂e and composting one ton of food waste can prevent the production of approximately 0.3 MTCO₂e (CARB, 2017). According to the Air Quality, Climate Change Impact and Health Risk Assessment report, there will also be a reduction in incremental GHG mobile emissions because newer cleaner emission off-road equipment is proposed for on-site use and there will be less vehicle miles travelled (VMT) from the waste sorting facility in Oxnard to the site (removing disposal route to landfill farther away from site).

Mitigation/Residual Impact(s)

No significant impacts on greenhouse gases have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
25. Community Character (PInG.)								
Will the proposed project:								
a) Either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects, introduce physical development that is incompatible with existing land uses, architectural form or style, site design/layout, or density/parcel sizes within the community in which the project site is located?		X				X		
b) Be consistent with the applicable General Plan Goals and Policies for Item 25 of the Initial Study Assessment Guidelines?	X				X			

25. Community Character (PInG.) Impact Discussion:

25a. 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). The area surrounding the project site consists primarily of lands in agricultural production and, to a lesser degree, very low density, rural residential development. The Santa Clara River is located ¼ mile to the south of the project site.

The project site is presently developed with an existing composting facility, which uses modular buildings and a weigh scale to conduct operations. Heavy equipment operated on the site include rubber tire front loaders, trommel screens and grinders.

Large-scale commercial organics processing operations are currently permissible within the AE zone subject to a CUP. Presently, NCZO Section 8107-36.4.1 states that no organics processing operations, other than those accessory to agricultural activities and on-site composting operations, can be located in the AE 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. The proposed project does not comply with the NCZO Section 8107-36.4.1. The Applicant has requested 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.

The proposed project has been evaluated for conformance with the applicable requirements of the Ventura County NCZO for the construction of commercial organics processing operations, including building setbacks, height limits, and other development standards. Additionally, as discussed in Sections B - 6, B - 8, and B - 22 (above) the proposed project will be conditioned to require the Applicant to submit plans and a material sample/color board, a landscape plan (under Mitigation Measure CULTURAL MM-2), and a lighting plan (under Mitigation Measure BIO MM-4), for proposed development to the Planning Division 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 and uses. Therefore, the project-specific impacts to community character will be less-than-significant, and the proposed project will not make a cumulatively considerable contribution to significant community character impacts.

Furthermore, significant impacts on community character would not occur for the following reasons:

- 1) The site is currently developed with an existing composting facility and while the proposed project will introduce a new land uses that could result in the displacement of existing agricultural development, the Ventura County Board of Supervisors, the decision making body for an ordinance text amendment, will consider changes to allow changes to the NCZO to accommodate commercial organics processing operations in Agricultural Zones that contain classified soils. On September 15, 2015, the Board of Supervisors heard the NCZO Text Amendments proposed by Agromin as part of the text amendment screening process (ZN12001). Under the proposed changes, the conversion of agricultural land will be limited by proposed language in the NCZO ordinance amendment to 200 acres county-wide. The proposed physical development will be in conformance with the applicable development requirements for lands within the AE zone, if these changes are adopted by the Board of Supervisors. The proposed CUP and Ordinance Text Amendment will be considered simultaneously by the Board of Supervisors during the decision-making process.
- 2) The access roads exist and would not be expanded or cause the further displacement of offsite agricultural development.

25b. The proposed project is consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 25 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on community character have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
26. Housing (PIng.)								
Will the proposed project:								
a) Eliminate three or more dwelling units that are affordable to: <ul style="list-style-type: none"> • moderate-income households that are located within the Coastal Zone; and/or, • lower-income households? 	X				X			
b) Involve construction which has an impact on the demand for additional housing due to potential housing demand created by construction workers?		X				X		
c) Result in 30 or more new full-time-equivalent lower-income employees?		X				X		
d) Be consistent with the applicable General Plan Goals and Policies for Item 26 of the Initial Study Assessment Guidelines?		X				X		

26. Housing (PIng.) Impact Discussion:

26a. The proposed project includes the construction of a commercial organics composting facility on 70 acres will not eliminate existing dwelling units. Therefore, the proposed project will not have a significant project-specific impact to housing. The proposed project will not make a cumulatively considerable contribution to a significant cumulative housing impact.

26b. As stated in the *Ventura County Initial Study Assessment Guidelines*, any project that involves construction has an impact on the demand for additional housing due to potential housing demand created by construction workers. However, construction worker demand would result in a less than significant, project-specific and cumulative because construction work is short-term and there is a sufficient pool of construction workers within Ventura County and the Los Angeles metropolitan regions. Therefore, the proposed project will have a less-than-significant, project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact, related to the demand for construction worker housing.

26c. The Ventura County Initial Study Guidelines (Section 26.b. – Housing) states that if a project would employ 30 or more new full-time equivalent (FTE) employees (excluding construction workers) it would be regarded as potentially significant if there is not enough available affordable housing within proximity to the project. This threshold is based upon General Plan Employment and Commerce/Industry Policy 3.4.2-9 which applies to all discretionary project until the development of a Housing Impact Mitigation Fee ordinance.

According to the project description no employees will reside on the project site. Currently, the existing composting operation has 11 full-time employees. The proposed project would increase the total number of full-team equivalent employees to 37. With 20 employees at the Agromin-Shoreline facility, it was previously estimated that Shoreline employees would be transferred to the expanded Agromin-Limoneira facility. However, the anticipated closure of the Agromin Shoreline facility is not final due to number of factors; operations at the Shoreline and Limoneira facilities may overlap for an undetermined interim period. Anticipating the possibility of extended operations at the Agromin Shoreline facility (for an indeterminate length of time), Agromin has determined that only one daily shift will be required for the Material Processing Buildings and the Packaging Building. Agromin states that employees would work a 10-hour shift, 6 days a week. The net increase of employees at the expanded Agromin-Limoneira facility is expected to be 26 employees.

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

The project would employ less than 30 or more new full-time equivalent (FTE) employees, below the threshold of significance for this category. Therefore, the impacts related to need for low and moderate income housing associated the generation of new employees will remain less than significant.

26d. The proposed project will be analyzed for conformance with the applicable *Ventura County General Plan Goals and Policies* for Item 26 of the *Ventura County Initial Study Assessment Guidelines*. The proposed project ~~would not have the potential to conflict with the following Ventura County General Plan policy 3.4.2-9, which requires an evaluation of :~~

~~Policy 3.4.2-9 Employment generating discretionary development resulting in 30 or more new full-time and full-time-equivalent employees shall be evaluated to assess the project's impact on lower-income housing demand within the community in which the project is located or within a 15-minute commute distance of the project, whichever is more appropriate. At such time as program 3.4.3-3 is completed, this policy shall no longer apply.~~

As described above, the project would employ less than 30 new full-time equivalent (FTE) employees, below the threshold of significance for this category. Therefore, project impacts related to potential conflict with Policy 3.4.2-9 would remain less than significant.

Mitigation/Residual Impact(s)

No significant impacts on housing have been identified; therefore, no mitigation measures are required. Impacts to housing are considered significant and will be evaluated in an EIR.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
27a(1). Transportation & Circulation - Roads and Highways - Level of Service (LOS) (PWA)								
Will the proposed project:								
a) Cause existing roads within the Regional Road Network or Local Road Network that are currently functioning at an acceptable LOS to function below an acceptable LOS?								

27a(1). Transportation & Circulation - Roads and Highways - Level of Service (LOS) (PWA) Impact Discussion:

27a(1) a. The Applicant is requesting a Conditional Use Permit for a commercial organics processing facility. As proposed, the project has the potential to generate additional traffic on local public roads and the Regional Road Network; however, the traffic generated by the project does not have the potential to alter the Level of Service (LOS) on nearby, County maintained roads. The project site will be accessed from the north via Edwards Ranch Road (private). Traffic will access Edwards Ranch Road primarily from Telegraph Road. The site will not be accessed from Todd Road or Gaythorne Road (private) east of the property. Public safety secondary access may be sited at either of these roads as analyzed under Section B – 27a(4) for Tactical Access.

Associated Transportation Engineers (ATE) completed a traffic study for the project (Attachment 17). The traffic study concluded:

- The addition of project traffic to the State Route 126 and the adjacent roadways would not significantly impact the study-area roadway segments based on Ventura County impact criteria.
- The addition of project traffic would not significantly impact the study-area intersections during the A.M. and P.M. peak hour periods.
- The project would be consistent with the Ventura County General Plan by paying the "Traffic Impact Mitigation Fee".
- The project would add less than 50 peak hour trips to State Route 126, thus no impacts based on the County's Congestion Management Program (CMP) criteria.

- The intersections are all expected to operate at LOS "C" or better with the addition of cumulative + project peak hour volumes, and thus would not exceed the CMP LOS "E" standard.

Trip generation data within the traffic study is summarized below⁷:

Table 27a1-1

Project Daily Trips by Vehicle Type:	Loads	ADT	Time Period
incoming waste SL/FL (side loader/front loader)	74	148	7AM - 5PM, Mon.-Fri.
incoming waste TT (transfer trailer)	25	49	7AM - 5PM, Mon.-Fri.
incoming waste BH (business & self haul)	124	248	7AM - 5PM, Mon.-Fri.
incoming waste RO (roll off)	6	11	7AM - 5PM, Mon.-Fri.
Incoming supplies deliveries (transfer trailer)	9	18	7AM - 5PM, Mon.-Fri.
Outgoing sales (roll off)	5	10	7AM - 5PM, Mon.-Fri.
Outgoing sales (transfer trailer)	25	50	7AM - 5PM, Mon.-Fri.
Outgoing sales (dump truck)	31	63	7AM - 5PM, Mon.-Fri.
Outgoing sales (customer self pickup/trailer)	24	49	7AM - 5PM, Mon.-Fri.
Employees (office)	10	20	7AM - 5PM, Mon.-Fri.
Employees (waste receiving & maintenance)	8	16	7AM - 5PM, Mon.-Sat.
Employees (material processing bldg.)	10	20	6AM - 3PM, Mon.-Sun.
Employees (material processing bldg.)	10	20	3PM - 10PM, Mon.-Sun.
Employees (packaging)	5	10	6AM - 3PM, Mon.-Sat.
Employees (packaging)	5	10	3PM - 10PM, Mon.-Sat.
Employees (outdoor processing)	4	8	sunrise - sunset
Visitors	10	20	7AM - 5PM, Mon.-Sat.
Total	385	770	
Incoming Waste Total:	229	458	
Outgoing Sales Total:	85	170	
Incoming Deliveries Total:	9	18	
Employee/Visitor Total:	62	124	
Total:	385	770	

To address the cumulative adverse impacts of traffic on the Regional Road Network, *Ventura County General Plan* Goals, Policies, and Programs Section 4.2.2 6 and *Ventura County Ordinance Code*, Division 8, Chapter 6 require that the Transportation Department of the Public Works Agency collect a Traffic Impact Mitigation Fee (TIMF)

⁷ Note that the applicant amended their project description in March 2020, determining that the project will only require one daily 10-hour shift (six days a week) for the Material Processing Buildings and the Packaging Building. This is attributable to an interim period (for an indeterminate length of time) in the overlap of operations with the Shoreline Facility. Evaluation of LOS related impacts will not be affected by the applicant-initiated revisions to the project description.

from developments. This project is subject to this Ordinance. With payment of the TIMF(s), LOS and safety of the existing roads would remain consistent with the County's General Plan.

Therefore, adverse traffic impacts relating to LOS of County roads will be less than significant.

Mitigation/Residual Impact(s)

No significant Impacts on transportation/circulation have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
27a(2). Transportation & Circulation - Roads and Highways - Safety and Design of Public Roads (PWA)								
Will the proposed project:								
a) Have an Adverse, Significant Project-Specific or Cumulative Impact to the Safety and Design of Roads or Intersections within the Regional Road Network (RRN) or Local Road Network (LRN)?			X			X		

27a(2). Transportation & Circulation - Roads and Highways - Safety and Design of Public Roads (PWA) Impact Discussion:

27a(2) a. The traffic generated by the project has the potential to alter the safety of nearby, County maintained roads used to access the project site. 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, pavement widening and utility pole relocation are required for the project. In addition, the Public Works Agency Transportation Department required the following improvements at the intersection of Telegraph Road and Edwards Ranch Road:

- Lengthen existing westbound left-turn pocket on Telegraph Road from 40 feet to 150 feet.
- Construct a 150-foot eastbound right-turn pocket on Telegraph Road.
- Remove large palm tree at southeast corner of the intersection.
- Replace stop sign and pole with new stop sign and pole at Edwards Ranch Road.
- Install white stop bar and legend at Edwards Ranch Road.

The proposed street improvements are shown in the attached plans (Attachment 2). These improvements will accommodate trucks and large vehicles for both westbound and eastbound traffic entering the project from Telegraph Road, mitigating the potential safety impacts from project-generated traffic. Therefore, impacts related to safety/design of County roads will be less than significant.

Mitigation/Residual Impact(s)

Mitigation Measure TRANSPORTATION MM-1 - Road Improvements:

Purpose: To ensure that intersection improvements at Telegraph Road and Edwards Ranch Road are constructed to accommodate vehicles accessing the project site.

Requirement: Road improvements listed below are required to mitigate the impact at the intersection of Telegraph Road and Edwards Ranch Road in accordance with the County Road Standards. Telegraph Road has an existing road width of 40 feet. The minimum required road width is 32 feet per Road Standard Plate B 7 [A].

- a. At the intersection of Telegraph Road and Edwards Ranch Road, construct a 12-foot-wide eastbound right turn lane on Telegraph Road.
- b. At the intersection of Telegraph Road and Edwards Ranch Road, provide 150 foot storage length for the westbound left turn lane and 150 foot storage length for the eastbound right turn lane on Telegraph Road.
- c. Existing southwest and southeast corners of the Telegraph Road/Edwards Ranch Road intersection are inadequate for large truck movements. Pavement widening, utility relocation and removal of the existing large palm tree at the southeast corner of the intersection will be required to accommodate appropriate turn radii.
- d. Install white stop bar striping on northbound Edwards Ranch Road at Telegraph Road. Remove and replace existing stop sign and pole at Edwards Ranch Road to meet current standards.
- e. Submit road improvement, striping and signage plans prepared by a Registered Civil Engineer to the Ventura County Public Works Agency (PWA) – Transportation Department for review and approval. Enter into an agreement with the County to complete the road improvements. Submit the agreement to the PWA – Transportation Department for review and approval. Post sufficient surety guaranteeing the construction of the road improvements. Submit proof to the PWA – Transportation Department that the surety has been posted.

Documentation: The Permittee shall submit road improvement, striping and signage plans, agreement, and proof of posting the surety to the Ventura County PWA – Transportation Department for review and approval.

Timing: The Permittee shall submit the required documentation (road improvement, striping and signage plans, agreement) prior to the issuance of the Zoning Clearance for construction. Surety shall be posted prior to issuance of a Building Permit.

Monitoring and Reporting: The Ventura County PWA – Transportation Department will review the improvement plans, agreement, and surety for conformance with the project conditions. The Ventura County PWA – Transportation Department maintains copies of the road improvement documentation and surety submitted by the Permittee.

Residual Impacts:

With the implementation of Mitigation Measure TRANSPORTATION MM-1, project-specific impacts related to safety and design of public roads will be reduced to a less than significant level.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
27a(3). Transportation & Circulation - Roads & Highways – Safety & Design of Private Access (VCFPD)								
a) If a private road or private access is proposed, will the design of the private road meet the adopted Private Road Guidelines and access standards of the VCFPD as listed in the Initial Study Assessment Guidelines?	X				X			
b) Will the project be consistent with the applicable General Plan Goals and Policies for Item 27a(3) of the Initial Study Assessment Guidelines?	X				X			

27a(3). Transportation & Circulation - Roads & Highways – Safety & Design of Private Access (VCFPD) Impact Discussion:

27a(3) a. Primary site access will occur via Edwards Ranch Road, a private road, which will 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 which connects to Todd Road to the east and Darling Road to the west. Secondary access will be constructed to meet the adopted Private Road Guidelines and access standards of the VCFPD.

27a(3) b. The proposed project is consistent with the applicable Ventura County General Plan Goals and Policies for Item 27a(3) of the Ventura County Initial Study Assessment Guidelines.

Mitigation/Residual Impact(s)

No significant impacts on safety & design of private access have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
27a(4). Transportation & Circulation - Roads & Highways - Tactical Access (VCFPD)								
Will the proposed project:								
a) Involve a road or access, public or private, that complies with VCFPD adopted Private Road Guidelines?	X							
b) Be consistent with the applicable General Plan Goals and Policies for Item 27a(4) of the Initial Study Assessment Guidelines?		X				X		

27a(4). Transportation & Circulation - Roads & Highways - Tactical Access (VCFPD) Impact Discussion:

27a(4) a. Primary site access will occur via Edwards Ranch Road, a private road which connects the site to Telegraph Road, 3,600 feet north of the project entrance. This distance is in excess of the 800-foot standard required by the Ventura County Fire Protection District (VCFPD). Secondary all-weather access, as required by VCFPD, is proposed along an unnamed access road which connects to Todd Road to the east and Darling Road to the west. Secondary access will be required to meet private road standards. Therefore, adverse impacts relating to access for firefighting purposes will be less-than-significant and would not make a cumulatively considerable contribution to a significant cumulative impact on tactical access.

27a(4) b. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 27a(4) of the Ventura County Initial Study Assessment Guidelines*.

Condition of Approval Residual Impact(s)

Maximum Single Access Road Length

Purpose: To ensure that adequate fire department access is provided in conformance with current California State Law and Ventura County Fire Protection District Ordinance.

Requirement: The Permittee shall design the project such that when only one (1) access point is provided, the maximum length of the access road shall not exceed 800 feet from the point of two (2) separate means of ingress / egress. The two (2) separate means of ingress/egress shall not re converge to a single intersection or access road from the area. Note: The maximum length may be increased when in compliance with the VCFC and State Law.

Documentation: A stamped copy of the approved access plan.

Timing: The Permittee shall submit an access plan to the Fire Prevention Bureau for approval before the issuance of building permits. All required access shall be installed before the start of combustible construction.

Monitoring and Reporting: A copy of the approved access plan shall be kept on file with the Fire Prevention Bureau. The Fire Prevention Bureau shall conduct a final inspection to ensure that the access is installed according to the approved plans. Unless a modification is approved by the Fire Prevention Bureau, the Permittee, and their successors in interest, shall maintain the access for the life of the development.

No significant impacts on tactical access have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
27b. Transportation & Circulation - Pedestrian/Bicycle Facilities (PWA/Plng.)								
Will the proposed project:								
1) Will the Project have an Adverse, Significant Project-Specific or Cumulative Impact to Pedestrian and Bicycle Facilities within the Regional Road Network (RRN) or Local Road Network (LRN)?		X				X		
2) Generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 27b of the Initial Study Assessment Guidelines?		X				X		

27b. Transportation & Circulation - Pedestrian/Bicycle Facilities (PWA/PInG.)
Impact Discussion:

27b 1. 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). Therefore, the proposed project will not have a project-specific adverse impact and will not make a cumulatively considerable contribution to a significant cumulative impact to pedestrian and bicycle facilities/traffic.

27b 2. The proposed project will not generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities. The project site is located approximately 2 miles from the Community of Saticoy and the City of Ventura, the nearest populated communities. The proposed project is located within a rural area removed from a concentration of pedestrian and bike routes as well as from schools (nearby school sites are two miles from the project site) and commercial centers and transit facilities. The provision long-term and short-term bicycle parking onsite is not practice due to the type of vehicle traffic that will utilize the site and the private road to the site entrance. No further mitigation is required.

Based on the above discussion, the project specific pedestrian/bicycle facility impacts will be less than significant, and the proposed project will not make a cumulatively considerable contribution to pedestrian/bicycle facilities impacts.

27b 3. The proposed project is consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 27b of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on pedestrian/bicycle facilities have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
27c. Transportation & Circulation - Bus Transit								
Will the proposed project:								
1) Substantially interfere with existing bus transit facilities or routes, or create a substantial increase in demand for additional or new bus transit facilities/services?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 27c of the Initial Study Assessment Guidelines?		X				X		

27c. Transportation & Circulation - Bus Transit Impact Discussion:

27c-1. According to the *Ventura County Initial Study Assessment Guidelines* (p. 173), "A project will normally have a significant impact on bus transit if it would substantially interfere with existing bus transit facilities or routes, or if it would create a substantial increased demand for additional or new bus transit facilities/services." However, only "projects that can be expected to generate more than 100 daily vehicle trips (10 single family housing units or equivalent traffic generation) will require an evaluation of the specific project impacts through either consultation with the appropriate transit service provider or separate analysis performed by the Applicant."

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 two miles east of the project site at a Ventura Intercity Transit Authority transit stop located near the Briggs School. The proposed project consists of the construction of a commercial organics composting operation. As discussed in Section 27a(1) (above), the proposed project will generate 770 average daily vehicle trips. The greater part of the increased traffic is associated incoming waste, outgoing sales and incoming deliveries. 124 average daily trips are attributable to employee and visitor trips, a net increase of 98 daily vehicle trips from the existing baseline of 26 average daily trips. Therefore the proposed project will not have a project-specific impact on bus transit facilities/services and will not make a cumulatively considerable contribution to a significant cumulative impact related to bus transit facilities/services.

27c 2. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 27c of the Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on bus transit facilities have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
27d. Transportation & Circulation - Railroads								
Will the proposed project:								
1) Individually or cumulatively, substantially interfere with an existing railroad's facilities or operations?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 27d of the Initial Study Assessment Guidelines?		X				X		

27d. Transportation & Circulation - Railroads Impact Discussion:

27d 1. A 100-foot wide Southern Pacific Railroad right-of-way currently owned by the Ventura County Transportation Commission per Instrument No. 95-131252 abuts the assessor parcel boundary to the north. At grade railroad tracks are located along the northern boundary of the project, approximately 50 feet from the entrance of the facility. The existing operation 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).

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 will be constructed within proximity to these existing tracks; the administrative building will be setback approximately 75 feet from the tracks. The description for proposed project indicates that the tracks are presently inactive railroad. However, the proposed project will not create additional demand for railroad facilities or operations. The property owner and permittee will be responsible for interfacing with VCTC to update or amend the existing license agreement, if required. Therefore, the proposed project will not have a project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact, related to railroad facilities/operations.

27d 2. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 27D of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on railroad facilities have been identified, therefore no mitigation measures are necessary.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
27e. Transportation & Circulation – Airports (Airports)								
Will the proposed project:								
1) Have the potential to generate complaints and concerns regarding interference with airports?	X				X			
2) Be located within the sphere of influence of either County operated airport?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 27e of the Initial Study Assessment Guidelines?	X				X			

27e. Transportation & Circulation – Airports (Airports) Impact Discussion:

27e 1 and 27e 2. The proposed project is located 5.5 miles southwest from the Santa Paula Airport. The project site is not located within the sphere of influence of any County operated airport. Furthermore, proposed structures will not exceed the maximum height of 35 feet allowed by the Ventura County NCZO and will not involve the introduction of substantial lighting or other features that could interfere with air traffic safety. Therefore, the proposed project will not have a project-specific adverse impact and will not make a cumulatively considerable contribution to a significant cumulative impact related to existing airport facilities or operations.

27e 3. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 27e of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on airports have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
27f. Transportation & Circulation - Harbor Facilities (Harbors)								
Will the proposed project:								
1) Involve construction or an operation that will increase the demand for commercial boat traffic and/or adjacent commercial boat facilities?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 27f of the Initial Study Assessment Guidelines?	X				X			

27f. Transportation & Circulation - Harbor Facilities (Harbors) Impact Discussion:

27f 1. The proposed project is located 8.7 miles from the nearest harbor, Ventura Harbor. The proposed project will not result in an increase in demand for commercial boat traffic. Therefore, the proposed project will not have project-specific adverse impacts and will not make cumulatively considerable contribution to a significant cumulative impact related to existing harbor facilities or operations.

27f 2. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 27f of the Ventura County Initial Study Assessment Guidelines.*

Mitigation/Residual Impact(s)

No significant impacts on harbor facilities have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
27g. Transportation & Circulation - Pipelines								
Will the proposed project:								

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	PS	N	LS	PS-M	PS
1) Substantially interfere with, or compromise the integrity or affect the operation of, an existing pipeline?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 27g of the Initial Study Assessment Guidelines?		X				X		

27g. Transportation & Circulation - Pipelines Impact Discussion:

27g 1. The County GIS Maps (2019) indicate that the proposed CUP boundary is proximity of a major pipeline. The proposed project does not propose to relocate or remove these existing improvements. Therefore, the proposed project will not result in project-specific impacts and will not make a cumulatively considerable contribution to a significant cumulative impact related to pipeline facilities.

27g 2. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 27g of the Ventura County Initial Study Assessment Guidelines.*

Mitigation/Residual Impact(s)

No significant impacts on pipelines have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
28a. Water Supply – Quality (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 28a of the Initial Study Assessment Guidelines?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 28a of the Initial Study Assessment Guidelines?	X				X			

28a. Water Supply – Quality (EHD) Impact Discussion:

28a 1. Domestic water supply for the proposed project will be provided by the City of Santa Paula. A water will serve letter dated March 22, 2018, from the City of Santa Paula (Attachment 7) confirms the intent to connect the proposed project to the City's potable water service upon the satisfaction of specific requirements, including, infrastructure upgrades and connection fees. The proposed project will not have any project specific or cumulative impacts to the domestic water supply.

28a 2. The proposed project is consistent with the *Ventura County General Plan Goals and Policies for Item 28a of the Ventura County Initial Study Assessment Guidelines.*

Mitigation/Residual Impact(s)

No significant Impacts on water supply - quality have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
28b. Water Supply – Quantity (WPD)								
Will the proposed project:								
1) Have a permanent supply of water?		X				X		
2) Either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects, introduce physical development that will adversely affect the water supply - quantity of the hydrologic unit in which the project site is located?		X				X		
3) Be consistent with the applicable General Plan Goals and Policies for Item 28b of the Initial Study Assessment Guidelines?		X				X		

28b. Water Supply – Quantity (WPD) Impact Discussion:

28b 1. Domestic and operational water for the proposed project will be provided by the City of Santa Paula. A water will serve letter dated March 22, 2018, from the City of Santa Paula (Attachment 7) confirms the intent to connect the proposed project to the City's potable water service upon the satisfy action of specific requirements, including, infrastructure upgrades and connection fees. The issuance of an intent to serve establishes a permanent water supply.

28b 2. As discussed in this initial study, Section 2a (above), The proposed operation will remove 55 acres of orchards and render the site area impermeable. The proposed operation will capture and store rainwater to supplement composting operational water needs. According to the Facility Water Balance Study (Attachment 8), “an efficient orchard irrigation system should not create excessive runoff either as surface flow or groundwater percolation.” However, the study does not provide information regarding the loss of recharge and precipitation due to reduction of permeability of the 55-acre orchard area. According to a 2010 study conducted by the Irrigation Training and Research Center for the Fox Canyon Groundwater Management Agency (FCGMA), citrus in the area has an adjusted leaching requirement of 16%. Therefore, the net irrigation impact by the existing basin is approximately 127 AFY. With rainwater capture and storage, the proposed project would result in a net reduction in groundwater use, estimated at 60 AF less than the current orchard use in normal precipitation years, 76 AF less in wet years, with a net increase of 2 AF 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 and is considered less than significant for groundwater quantity.

The proposed project overlies the Santa Paula Basin, which is in hydrologic connection with the Oxnard Subbasin, designated Critically Overdrafted by the California Department of Water Resources. However, the proposed project will result in a net decrease in groundwater use from the present use with the conversion of land use from agricultural to commercial. The proposed project would not result in net groundwater extraction that would individually or cumulatively cause an overdrafted basin and is therefore considered less than significant for groundwater quantity

28b 3. The proposed project will be consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 28b of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on water supply - quantity have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
28c. Water Supply - Fire Flow Requirements (VCFPD)								
Will the proposed project:								
1) Meet the required fire flow?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 28c of the Initial Study Assessment Guidelines?		X				X		

28c. Water Supply - Fire Flow Requirements (VCFPD) Impact Discussion:

28c 1. Water to the proposed project will be supplied by the City of Santa Paula. The Applicant will be 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 in the building within the proposed structures will be installed as part of the proposed project. The fire hydrants and fire sprinklers in the building will be required to meet VCFPD fire flow requirements. Therefore, the proposed project will not have any

project-specific impacts and will not make a cumulatively considerable contribution to a significant cumulative impact, related to fire flow requirements.

28c 2. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 28c of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on fire flow requirements have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
29a. Waste Treatment & Disposal Facilities - Individual Sewage Disposal Systems (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 29a of the Initial Study Assessment Guidelines?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 29a of the Initial Study Assessment Guidelines?		X				X		

29a. Waste Treatment & Disposal Facilities - Individual Sewage Disposal Systems (EHD) Impact Discussion:

29a 1. The proposed project will utilize onsite wastewater treatment systems (OWTS). A Soils Report dated April 3, 2017, shows the site is suitable for a conventional OWTS which utilizes leach line dispersal fields. The proposed OWTS for the site includes: one 4,000-gallon septic tank for the Administration building; one 2,500-gallon tank for the Production building, one 2,500-gallon tank for the Maintenance building, one 2,000-gallon tank for the Green Materials Processing building, and one 2,000 gallon tank for the Wet Organics Processing building. Wastewater will be pumped via well pumps and dosing tanks to the leach lines at the north western section of the site. A waste discharge permit from the Los Angeles Regional Water Quality Control Board will be required in order for this project to comply with state law. Conformance with the County Building Code Ordinance, state OWTS policy, and EHD guidelines, as well as proper routine maintenance of septic systems, will reduce any project specific and cumulative impacts to a level considered less than significant.

29a 2. The proposed project will be consistent with the *Ventura County General Plan Goals and Policies* for Item 29a of the *Ventura County Initial Study Assessment Guidelines* provided the septic systems are properly installed and maintained so as not to contaminate groundwater or create a public nuisance, and adequate setbacks from septic tanks and disposal fields are maintained.

Mitigation/Residual Impact(s)

No significant impacts on individual sewage disposal systems have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
29b. Waste Treatment & Disposal Facilities - Sewage Collection/Treatment Facilities (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 29b of the Initial Study Assessment Guidelines?	X				X			
2) Be consistent with the applicable General Plan Goals and Policies for Item 29b of the Initial Study Assessment Guidelines?	X				X			

29b. Waste Treatment & Disposal Facilities - Sewage Collection/Treatment Facilities (EHD) Impact Discussion:

29b 1. The proposed project will utilize an onsite wastewater treatment system and will not require connection to a sewage collection facility at this time. Therefore, the proposed project will not have any project specific and will not make a cumulative considerably contribution to a significant cumulative impact, related to the use of a sewage collection/treatment facility.

29b 2. The proposed project is consistent with the *Ventura County General Plan Goals and Policies* for Item 29b of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on sewage collection/treatment facilities have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
29c. Waste Treatment & Disposal Facilities - Solid Waste Management (PWA)								
Will the proposed project:								
1) Have a direct or indirect adverse effect on a landfill such that the project impairs the landfill's disposal capacity in terms of reducing its useful life to less than 15 years?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 29c of the Initial Study Assessment Guidelines?		X				X		

**29c. Waste Treatment & Disposal Facilities - Solid Waste Management (PWA)
Impact Discussion:**

29c 1. As required by California Public Resources Code (PRC) 41701, Ventura County's Countywide Siting Element (CSE), adopted in June 2001 and updated annually, indicated Ventura County has at least 15 years of disposal capacity available for waste generated by in-County projects. Because the County currently exceeds the minimum disposal capacity required by state PRC, the proposed project will result in less-than-significant project-specific and cumulative impacts upon Ventura County's solid waste disposal capacity.

29c 2. 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% of the solid waste generated by their project. The IWMD's waste diversion program (Form B Recycling Plan/Form C Report) ensures this 65% 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 4.4.1 1 and 2 and Policies 4.4.2 1, 2, and 6. Therefore, the proposed project will have less than significant project specific impacts and will not make a cumulatively considerable contribution to significant cumulative impacts related to the Ventura County General Plan's goals and policies for solid waste disposal capacity.

The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 29c of the Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on solid waste management have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
29d. Waste Treatment & Disposal Facilities - Solid Waste Facilities (EHD)								
Will the proposed project:								
1) Comply with applicable state and local requirements as set forth in Section 29d of the Initial Study Assessment Guidelines?			X				X	
2) Be consistent with the applicable General Plan Goals and Policies for Item 29d of the Initial Study Assessment Guidelines?			X				X	

29d. Waste Treatment & Disposal Facilities - Solid Waste Facilities (EHD) Impact Discussion:

29d 1. This existing 15-acre composting facility has an active permit to operate with the Ventura County Environmental Health Division, Local Enforcement Agency (LEA) for a composting operation and chip and grind operation (FA0009836; SWIS 56 AA 0147; Geotracker ID T10000010023). The proposed project involves expanding the activities from 15 acres to 70 acres and would include commercial food waste and green waste. Estimated annual tons per year of feedstock is 295,000 cubic yards and up to 153,000 cubic yards of materials stored onsite. These activities constitute a full solid waste facility permit to be issued by EHD LEA and requires concurrence from the State CalRecycle.

A composting facility must meet general design and operating standards as described in California Code of Regulations 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 Applicant provided a Vector Control Plan (Attachment 16), Odor Impact Minimization Plan (Attachment 6), Dust Control Plan (Attachment 5) and Containment Area for Compost Processing Operations Plan (Attachment 10). If nuisance and health/safety issues are not being addressed as prescribed by these plans, operation and maintenance measures will be reevaluated and the plans amended. Operations and maintenance of the wet organics processing building is of a particular concern due to the wet organic residue deposited on processing equipment, any intermediate containers/machinery used for storage or conveyance, and the immediate area around the processing equipment. This wet organics processing building requires regular cleaning to prevent

odors, grime, and the attraction of vector. Depending on the incoming food material, there may be grease, fats, oils, etc. that require degreasing cleansers to effectively clean the building.

Compliance with federal, state, and local solid waste regulations, and recommended mitigation measure WAST MM-1, will reduce potentially significant public health impacts to a level considered less than significant.

29d 2. The proposed project will be consistent with the *Ventura County General Plan* Goals and Policies for Item 29d of the *Ventura County Initial Study Assessment Guidelines*, provided the facility remains in compliance with all applicable laws, regulations, and health and safety measures related to the operation of a composting facility.

Mitigation/Residual Impact(s)

Mitigation Measure WASTE MM-1 – Composting Facility – Wet and Dry Organics Processing Design, Operation, and Maintenance

Purpose: To ensure the facility site complies with California Code of Regulations Title 14, Section 17866 “General Design Requirements” and Section 17867 “General Operating Standards” for composting facilities.

Requirement: The buildings shall be designed and operated to prevent leachate leaving the site, minimize odors, and ensure employees are working in a safe and healthy workplace. The interior of the Wet Organics Processing Building and equipment inside, shall be cleaned with degreasing cleansers to effectively remove grease, fats, oils, etc. The cleaning of the Wet Organics Building shall be performed periodic basis in conformance with a written maintenance and operations plan. Water used to clean the Wet Organics Processing Building shall be discharged to in an appropriate manner to avoid chemicals damaging the composting process.

Documentation: The Permittee shall provide written maintenance and operations plans identifying best management practices and specific control technologies proposed for the operation and maintenance of the dry and wet organics buildings, including controls for nuisance and health concerns within the building (odors, pooling of liquids, vector control, etc.).

Timing: Operations and maintenance plans shall be submitted to the Ventura County Environmental Health Division, Local Enforcement Agency (LEA) for review and approval prior to LEA’s approval of the Solid Waste Facility Permit. The Permittee shall follow the approved operations and maintenance plans developed to prevent and/or mitigate nuisances, vectors, and odors, at all times.

Monitoring and Reporting: Ventura County Environmental Health Division, LEA will evaluate the adequateness and effectiveness of the facility’s operations and maintenance plans during routine site visits and complaint investigations.

Residual Impacts:

With the implementation Mitigation Measure WASTE MM-1, project-specific impacts related to waste-treatment and disposal will be reduced to a less than significant level.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
30. Utilities								
Will the proposed project:								
a) Individually or cumulatively cause a disruption or re-routing of an existing utility facility?		X				X		
b) Individually or cumulatively increase demand on a utility that results in expansion of an existing utility facility which has the potential for secondary environmental impacts?		X				X		
c) Be consistent with the applicable General Plan Goals and Policies for Item 30 of the Initial Study Assessment Guidelines?		X				X		

30. Utilities Impact Discussion:

The project site is currently served by existing electrical facilities provided by Southern California Edison. The proposed project will utilize a propane tank; and, therefore, a natural gas service line connection will not be required. Therefore, the proposed project will not result in project-specific impacts and will not make a cumulatively considerable contribution to a significant cumulative impact related to existing utility facilities.

30a and 30b. The area in which the project site is located is currently served with electrical, gas, and communication facilities. Therefore, the proposed project will not make a cumulatively considerable contribution to a significant cumulative impact related to an expansion of an existing facility.

30c. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 30 of the Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on utility facilities have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
31a. Flood Control Facilities/Watercourses - Watershed Protection District (WPD)								
Will the proposed project:								
1) Either directly or indirectly, impact flood control facilities and watercourses by obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water, resulting in exposing adjacent property and the community to increased risk for flood hazards?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 31a of the Initial Study Assessment Guidelines?		X				X		

31a. Flood Control Facilities/Watercourses - Watershed Protection District (WPD) Impact Discussion:

31a 1. The proposed project is situated about ¼ mile feet north of the Santa Clara River, which is a Ventura County Watershed Protection District (WPD) jurisdictional redline channel. No direct connections to the Santa Clara River are proposed. As discussed in Section 17b., the project site is in “Zone X Unshaded” areas (i.e., outside of the 100-year floodplain). However, offsite flows from Todd Barranca as determined in the Hydrologic and Hydraulic (H&H) analysis (Harrison Industries, November 2018) would be higher than one foot above the landside finished grade of the proposed retaining wall along the east side of the development (see Plan Sheets 19 and 20). This creates a leveed condition and therefore the retaining wall must be designed as a flood wall and meet the guidelines for levee design as delineated by the Army Corp of Engineers.

In accordance with Appendix J of the Ventura County Building Code, runoff from the proposed project site will 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. WPD staff determined that the proposed project design, with incorporation of the WPD conditions mentioned above, mitigates the direct and indirect project-specific and cumulative impacts to flood control facilities and watercourses. Therefore, the proposed project will result in less-than-significant project-specific and cumulative impacts, related to redline channels under the jurisdiction of WPD.

31a 2. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 31a of the Ventura County Initial Study Assessment Guidelines.*

Mitigation/Residual Impact(s)

No significant impacts on flood hazards have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
31b. Flood Control Facilities/Watercourses - Other Facilities (PWA)								
Will the proposed project:								
1) Result in the possibility of deposition of sediment and debris materials within existing channels and allied obstruction of flow?		X				X		
2) Impact the capacity of the channel and the potential for overflow during design storm conditions?		X				X		
3) Result in the potential for increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels both on and off site?	X				X			
4) Involve an increase in flow to and from natural and man-made drainage channels and facilities?	X				X			
5) Be consistent with the applicable General Plan Goals and Policies for Item 31b of the Initial Study Assessment Guidelines?		X				X		

31b. Flood Control Facilities/Watercourses - Other Facilities (PWA) Impact Discussion:

31b 1, 31b 2, 31b 3, and 31b 4. The proposed project preserves the existing trend of runoff and local drainage patterns, as indicated in the Regional and Local hydrology Study (Attachment 14, Harrison Industries, November 2018). The project is designed to capture and prevent any surface water runoff from the site that could impact

neighboring properties. Through a combination of site grading and a subsurface drain system, stormwater runoff from working surfaces will be directed to water retention ponds proposed to be installed at the south boundary of the project site. As required by the General WDR for Composting Operations (Order WQ 2016-0121-DWQ), the site has been designed to contain runoff from a 25-year, 24 hour storm within water retention basins.

The project will not create an obstruction of flow in the existing drainage as runoff from the project site will maintain the drainage conditions that presently exist. The runoff that normally would enter the project area will be collected and carried south past the project via a proposed protected bypass culvert that extends through the project and does not collect any onsite water. This project will not impact the capacity of the downstream channel (Santa Clara River) or increase the potential for channel overflow during design storm conditions. There will be no adverse effects to Areas of Special Flood Hazard, regulatory channels, and natural and man-made channels. The proposed project will be completed according to current codes and standards. Therefore, the impacts of the project on drainage facilities not under the jurisdiction of WPD are less than significant.

31b 5. The proposed project will be consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 31b-5 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on flood control facilities/watercourses have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
32. Law Enforcement/Emergency Services (Sheriff)								
Will the proposed project:								
a) Have the potential to increase demand for law enforcement or emergency services?	X				X			
b) Be consistent with the applicable General Plan Goals and Policies for Item 32 of the Initial Study Assessment Guidelines?	X				X			

32. Law Enforcement/Emergency Services (Sheriff) Impact Discussion:

32a. The proposed project includes a commercial organics processing facility which is not included in the list of project categories identified in the Ventura County Assessment Guidelines that have the potential to increase demand for law enforcement or emergency services. 24-hour security for the facility will be provided by perimeter fencing, locked gates and nighttime lighting around the onsite buildings. The nearest Ventura County Sheriff's Station is the West County Police Services/ Headquarters Station, located at 800 S. Victoria Avenue, Ventura, which is approximately 5.5 miles west of the project site. The proposed project will not substantially increase demand for law enforcement or emergency services. Therefore, the proposed project would not have a project-specific impact on or make a cumulatively considerable contribution to a cumulative impact to emergency services.

32b. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 32 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on law enforcement/emergency services have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
33a. Fire Protection Services - Distance and Response (VCFPD)								
Will the proposed project:								
1) Be located in excess of five miles, measured from the apron of the fire station to the structure or pad of the proposed structure, from a full-time paid fire department?	X				X			
2) Require additional fire stations and personnel, given the estimated response time from the nearest full-time paid fire department to the project site?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 33a of the Initial Study Assessment Guidelines?	X				X			

33a. Fire Protection Services - Distance and Response (VCFPD) Impact Discussion:

33a 1 and 33a 2. The nearest fire station, Ventura County Fire Station 26, is located at 536 W Main Street in Santa Paula. Fire Station 26 is 5.5 miles northeast of the project site. The distance from Fire Station 26 to the project site is adequate, and the proposed project will not require a new fire station or additional personnel. Therefore, the proposed project will have a less-than-significant project-specific impact related to fire protection services. The proposed project will not make a cumulatively considerable contribution to a significant cumulative impact related to fire protection services.

33a 3. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 33a of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on fire protection services (distance and response), have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
33b. Fire Protection Services – Personnel, Equipment, and Facilities (VCFPD)								
Will the proposed project:								
1) Result in the need for additional personnel?	X				X			
2) Magnitude or the distance from existing facilities indicate that a new facility or additional equipment will be required?	X				X			
3) Be consistent with the applicable General Plan Goals and Policies for Item 33b of the Initial Study Assessment Guidelines?	X				X			

**33b. Fire Protection Services – Personnel, Equipment, and Facilities (VCFPD)
Impact Discussion:**

33b 1. The proposed project will not result in the need for additional fire protection services personnel. Therefore, the proposed project will not have a project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact, with regard to personnel for fire protection services.

33b 2. As stated in this Initial Study (above), the nearest fire station to the project site is Ventura County Fire Station 26, which is located approximately 5.5 miles northeast of the project site. The distance from Fire Station 26 to the project site is adequate. Additionally, the Ventura County Fire Protection District will condition the proposed project, to require the Applicant to provide an on-site water supply and fire hydrants that will meet the required fire flow in accordance with the Ventura County Waterworks Manual and the Ventura County Fire Code. A new fire station or equipment will not be required to serve the proposed project. Therefore, the proposed project will not have a project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact, with regard to facilities and equipment for fire protection services.

33b 3. The proposed project will be consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 33b of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on fire protection services (personnel, equipment and facilities), have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
34a. Education - Schools								
Will the proposed project:								
1) Substantially interfere with the operations of an existing school facility?		X				X		
2) Be consistent with the applicable General Plan Goals and Policies for Item 34a of the Initial Study Assessment Guidelines?		X				X		

34a. Education - Schools Impact Discussion:

34a 1. The proposed project will not interfere with the operations of an existing school facility or cause a significant demand on schools. The proposed project is located approximately 1.94 miles southwest miles of the Briggs School, approximately 2 miles south of Oliveland's School and 2.2 miles east of Saticoy Elementary School. These distances will buffer impacts as analyzed in the Odor Impact Minimization Plan (Attachment 6) and Noise Impact Assessment (Attachment 15).

The State of California authorizes the collection of Developer Fees pursuant to § 65996 of the California Government Code (2014b) for commercial and industrial projects. These fees can be collected without special city or county approval, to 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 will the need for new or expanded school facilities due to new employment and the potential to result in an increase in the population of within the geographic area of the project. Education Code Section 17621(e)(1)(B) authorizes school districts to establish Commercial/Industrial Fees based upon the January 1990 edition of the "San Diego Traffic Generators," a report of the San Diego Association of Governments. The project is located within the Briggs Elementary School District and the Santa Paula Union Highschool District and will be subject to the collection of such developer fees. Therefore, the proposed project will have less-than-significant, project-specific impacts related to schools and will not make a cumulatively considerable contribution to a significant cumulative impact related to schools.

34a 2. The proposed project is consistent with the applicable *Ventura County General Plan* Goals and Policies for Item 34a of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on schools have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
34b. Education - Public Libraries (Lib. Agency)								
Will the proposed project:								
1) Substantially interfere with the operations of an existing public library facility?	X							
2) Put additional demands on a public library facility which is currently deemed overcrowded?		X						
3) Limit the ability of individuals to access public library facilities by private vehicle or alternative transportation modes?	X							
4) In combination with other approved projects in its vicinity, cause a public library facility to become overcrowded?						X		
5) Be consistent with the applicable General Plan Goals and Policies for Item 34b of the Initial Study Assessment Guidelines?		X				X		

34b. Education - Public Libraries (Lib. Agency) Impact Discussion:

34b 1 through 34b 4. The proposed project will not be located adjacent to a public library facility and will not interfere with the operations of an existing public library facility. The Planning Division staff analyzed Figure 4.9.1 (County Library Facilities map, *Ventura County General Plan Public Facilities and Services Appendix*, May 8, 2007 Edition) and determined that the project site is not located adjacent to or near any County library facilities. The nearest public library to the project site, Saticoy Library, is located approximately 1.87 miles south of the project site. The proposed use and development of the subject property does not have the potential to create project-specific impacts which would interfere with the use of a library. Therefore, the proposed project will not have a significant project-specific impact and will not make a cumulatively considerable contribution to a significant cumulative impact related to library services.

34b 5. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies for Item 34b of the Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant impacts on public libraries have been identified, therefore no mitigation measures are required.

Issue (Responsible Department)*	Project Impact Degree Of Effect**				Cumulative Impact Degree Of Effect**			
	N	LS	PS-M	P S	N	LS	PS-M	PS
35. Recreation Facilities (GSA)								
Will the proposed project:								
a) Cause an increase in the demand for recreation, parks, and/or trails and corridors?		X				X		
b) Cause a decrease in recreation, parks, and/or trails or corridors when measured against the following standards: <ul style="list-style-type: none"> Local Parks/Facilities - 5 acres of developable land (less than 15% slope) per 1,000 population; Regional Parks/Facilities - 5 acres of developable land per 1,000 population; or, Regional Trails/Corridors - 2.5 miles per 1,000 population? 		X				X		
c) Impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors?		X				X		
d) Be consistent with the applicable General Plan Goals and Policies for Item 35 of the Initial Study Assessment Guidelines?		X				X		

35. Recreation Facilities (GSA) Impact Discussion:

35a and 35 b. The proposed project does not include a residential component that would increase demand for recreation, parks, and/or trails and corridors in the local area and will not impede the future development of local parks facilities. Therefore, the proposed project will result in less-than-significant project-specific impacts and will not make a cumulatively considerable contribution to a significant cumulative impact, related to recreational facilities.

35c. The proposed project site is not located within or adjacent to a planned or proposed future park, recreational facility, or trail corridor. The proposed project will be built within the boundaries of an existing developed site and therefore no impacts on recreational facilities will occur.

35d. The proposed project is consistent with the applicable *Ventura County General Plan Goals and Policies* for Item 35 of the *Ventura County Initial Study Assessment Guidelines*.

Mitigation/Residual Impact(s)

No significant Impacts on recreation facilities have been identified, therefore no mitigation measures are required.

***Key to the agencies/departments that are responsible for the analysis of the items above:**

Airports - Department Of Airports	AG. - Agricultural Department	VCAPCD - Air Pollution Control District
EHD - Environmental Health Division	VCFPD - Fire Protection District	GSA - General Services Agency
Harbors - Harbor Department	Lib. Agency - Library Services Agency	Plng. - Planning Division
PWA - Public Works Agency	Sheriff - Sheriff's Department	WPD – Watershed Protection District

****Key to Impact Degree of Effect:**

N – No Impact
LS – Less than Significant Impact
PS-M – Potentially Significant but Mitigable Impact
PS – Potentially Significant Impact

Section C – Mandatory Findings of Significance

Based on the information contained within Section B:		
	Yes	No
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		X
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).		X
3. Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant.)		X
4. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X

Findings Discussion:

1. As discussed in Section B Items 4 (Biological Resources) and 8 (Cultural Resources) the proposed project would potentially have significant impacts on biological and cultural resources. However, with the imposition of the mitigation measures as defined in those sections, potential impacts would be mitigated to less-than-significant on project-specific and cumulative levels. The proposed project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

2. The proposed project will not result in the implementation of short-term goals to the disadvantage of long-term environmental goals. The proposed project facilitates meeting the State-wide target of 50 percent diversion (based on 2014 levels) of

organic waste from landfills mandated by California Senate Bill 1383 by 2020 through recycling, itself a long-term state-wide environmental goal. Potentially significant impacts associated with the project relate to the conservation of agricultural resources within Ventura County and not the implementation of environmental goals within the County. While Air Quality Impacts have been identified, anticipating the proposed rule change identified in the discussion in Section B, the proposed project will comply with the identified thresholds of significance for Criteria Air Pollutants.

3. As stated in Section B, and with the imposition of the recommended mitigation measures and conditions of approval, the proposed project does not have the potential to create a cumulatively considerable contribution to a significant cumulative impact.
4. The proposed project consists of the construction and operation of a Large-Scale Commercial Organics Processing Operation and Development Code Text Amendment to modify the requirements for these facilities within the AE Zone. As stated in Section B, the proposed project does not involve the use of hazardous materials in a manner that pose any unusual risks since they must be handled in compliance with all applicable regulations. Additionally, the proposed project does not involve operational noise that will interfere with surrounding uses, traffic hazards, adverse impacts on water resources located on or around the project site.

Section D – Determination of Environmental Document

Based on this initial evaluation:

[]	I find the proposed project could not have a significant effect on the environment, and a Negative Declaration should be prepared.
[]	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measure(s) described in Section B of the Initial Study will be applied to the project. A Mitigated Negative Declaration should be prepared.
[X]	I find the proposed project, individually and/or cumulatively, MAY have a significant effect on the environment and an Environmental Impact Report (EIR) is required.*
[]	I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An Environmental Impact Report is required, but it must analyze only the effects that remain to be addressed.*
[]	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EIR Issues of Focus: The EIR must evaluate the proposed project’s environmental impacts related to: Agricultural Resources – Soils (Planning Division), ~~and Housing (Planning Division).~~

This Initial Study identifies mitigation measures which avoid or reduce potentially significant impacts to a less than significant level for the following issues: Air Quality (Ventura County Air Pollution Control District, Planning Division), Water Resources – Surface Water Quality (Watershed Protection District), Biological Resources (Planning Division), Cultural Resources – Historic (Planning Division), Noise and Vibration (Planning Division), Public Health (Environmental Health Division), Transportation & Circulation – Roads and Highways – Safety and Design of Public Roads (Public Works

Agency), Waste Treatment & Disposal Facilities – Solid Waste Facilities (Environmental Health Division).

Furthermore, it has been determined that one or more of these potential significant impacts cannot be reduced to a less-than-significant level through the imposition of feasible mitigation measures; therefore, an Environmental Impact Report (EIR) must be prepared for this project.

John Oquendo, Case Planner

Date

Attachments:

Attachment 1 – Maps

Attachment 2 – Project Plans

Attachment 3 – Map and Lists of Pending and Approved Projects

Attachment 4 – Air Quality Analysis, Climate Change Impact and Health Risk Assessment (May 2017) and Update Memo (February 2020)

Attachment 5 – Dust Control Plan (February 2017)

Attachment 6 – Odor Impact Minimization Plan (February 2017)

Attachment 7 – City of Santa Paula Will Serve Letter (March 2018)

Attachment 8 – Facility Water Balance Study (February 2017)

Attachment 9 – Update of Geotechnical Engineering Report (December 2017)

Attachment 10 – Containment Area for Compost Processing Operations Plan (February 2017)

Attachment 11 – Initial Study Biological Assessment (April 2017)

Attachment 12 – Photo Simulations (January 2016)

Attachment 13 – Phase II Historic Resources Report (May 2017)

Attachment 14 – Regional and Local Hydrology Study (November 2018)

Attachment 15 – Noise Impact Assessment (February 2020)

Attachment 16 – Vector Control Plan (February 2017)

Attachment 17 – Traffic Study (February 2017)

Attachment 18 – Works Cited

ⁱ All emissions presented except “Landfill Fugitives Active Face” are taken from applicant consultant air quality calculations; also does not include permitted sources (flares, AD engine) since they are already mitigated by APCD rules and per determination methodology in VCAQAG

ⁱⁱ includes existing stockpile, windrow, and CASP emissions for Santa Paula and Oxnard locations

ⁱⁱⁱ based on back-calculating emissions from permitted flare, or LFGCS

^{iv} includes on-road vehicles and off-road mobile equipment; reduction in mobile emissions due to proposed use of Tier 4 off-road equipment and less vehicle miles travelled from waste sources to Gold Coast Recycling & Transfer Station for sorting and transfer to landfill

^v includes proposed stockpile, windrow, CASP, AD CHP engine exhaust and AD waste flare emissions