



April 7, 2020

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

Governor's Office of Planning & Research

APR 07 2020

STATE CLEARINGHOUSE

Subject: SCH No. 2020039054 – Notice of Preparation of an Environmental Impact Report for Agromin-Limoneira Commercial Organics Processing Operation, SWIS No. 56-A-0147 – Ventura County

Dear Mr. Oquendo:

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

PROJECT DESCRIPTION

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

The proposed Agromin-Limoneira Commercial Organics Processing (proposed project) is located on Tax Assessor's Parcel Number (APN) 090-0-180-085. The proposed project will be located on 70-acres. Currently, the 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 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 CUP 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).

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

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

COMMENTS

Daily Tonnage

The Initial Study states that there will be 65,500 tons per year of food material, including vegetative food material and 229,500 tons per year of green material, for a total of 295,000 tons of feedstock per year. Please provide an analysis for the maximum daily tonnage of all materials that will be received at the facility.

Solid Waste Regulatory Oversight

The County of Ventura, Resource Management Agency, Environmental Health Division is the Local Enforcement Agency (LEA) for Ventura County and responsible for providing regulatory oversight of solid waste handling activities. Please contact the LEA, Sean Debley at 805.648.9248 or by email at sean.debley@ventura.org to discuss the regulatory requirements for the proposed project.

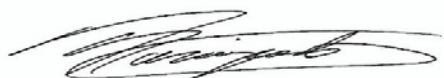
CONCLUSION

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

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

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

Sincerely,



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

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

Sean Debley, Manager
County of Ventura LEA