DEPARTMENT OF TRANSPORTATION

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April 6, 2020

John Oquendo County of Ventura, Planning Division 800 S. Victoria Avenue, #1740 Ventura, CA 93009 Governor's Office of Planning & Research

APR 06 2020

STATE CLEARINGHOUSE

RE:

Agromin-Limoneira Commercial Organics Processing Operation – Notice of Preparation (NOP) SCH# 2020039054 GTS# 07-VEN-2020-00403 Vic. VEN-126 PM 6.953

Dear John Oquendo,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project includes an 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 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 crossing over Ellsworth Barranca).

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

- 1. The project site is located in a rural area in the unincorporated area of Ventura County near the City of Santa Paula. Regional access to the Project Site is provided by SR-126 freeway via SR-118/Wells Road. and Briggs Road. While the proposed project would not contribute to an increase in population at the project site, it would generate a significant number of additional vehicle trips during operation. For the EIR, please confirm the number of employees at the facility, as one some documents stated 37 and another stated 52.
- 2. Construction of the proposed project would involve deliveries of materials, components, and supplies to the site, and may involve oversize trucks. Although it would not generate

a significant long-term operational impact to SR-126, construction would temporarily disrupt transportation and circulation patterns circulation patterns in vicinity of the proposed project thus disrupting local transportation along the haul routes. Also, the average daily truck traffic at SR-126 using SR-118/Wells Rd. on-off ramps and Briggs Road. on/off ramps are expected to increase throughout the construction. As a result, prior to issuance of building or grading permits for the project site, the applicant shall prepare a Construction Management Plan (CMP) for review and approval by City staff to reduce any impacts to less than significant levels. Caltrans requests that the CMP be included in the EIR for review.

Construction Management Plan

The CMP would include street closure information, detour plans, haul routes, staging plans, parking management plans and traffic control plans. The CMP would formalize how construction would be carried out and identify specific actions that would be required to reduce adverse effects on the surrounding community. The CMP should be based on the nature and timing of the specific construction activities and account for other concurrent construction projects in vicinity of the project site. The following elements shall be implemented, as appropriate:

- Schedule construction activities and construction-related deliveries to reduce the
 effects on traffic flows on surrounding arterial streets throughout peak hours of
 construction.
- Construction traffic routes shall avoid residential areas. This would ensure travel
 in the surrounding residential neighborhoods is minimized and that construction
 vehicles travel along arterial roadways to access the project site rather than
 through the neighborhoods or along pedestrian routes.
- Obtain the required permits for truck haul routes from the City prior to issuance of any permit for the project.
- The project contractor shall identify and enforce truck haul routes deemed acceptable by the City for construction trucks.
- Signs shall be posted along roads identifying construction traffic access or flow limitations due to single lane conditions during periods of truck traffic, if needed.
- Provide for temporary traffic control during all construction activities adjacent to the public right-of-way to improve traffic flow on public roadways (e.g., flag men).
- Accommodate all equipment and worker parking on-site to the extent feasible.
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.
- Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on freeways, will require a transportation permit from Caltrans.
- Provide construction analysis on significant impact due to increases in construction truck traffic on freeways not designated as truck routes.

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3. It is expected that further evaluation of potentially significant impacts related to traffic the proposed project will be conducted in the EIR. The EIR needs to specify that Caltrans has the jurisdiction for review and approval of any work that would affect the freeways and its facilities. As required by SB 743, Vehicle Miles Travelled (VMT) will be the standard transportation metric for land use projects and new Transportation Impact Studies, and these guidelines will be used to analyze and address transportation impacts on the State Transportation System. If the Lead Agency has not established its own VMT reduction thresholds before July 1st, 2020, then the California Governor's Office of Planning and Research's (OPR) suggested VMT reduction thresholds of a 15% reduction in per capita VMT will apply. Caltrans looks forward to the full VMT analysis to confirm that the project will result in a net reduction in per capita VMT.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-VEN-2020-00403.

Sincerely,

MIYA EDMONSON

IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse