

## MEMORANDUM

**DATE:** October 8, 2021

**To:** John Powers, PMP, Project Manager III, Orange County Waste & Recycling

**FROM:** Dean Arizabal, Principal, LSA

**SUBJECT:** Transportation Memorandum for the Valencia Greenery Project  
(LSA Project No. SWT1701.05)

The purpose of this Transportation memorandum is to describe and document potential transportation impacts associated with the implementation of the proposed Valencia Greenery Project (project). This technical information is provided for project review under the California Environmental Quality Act (CEQA).

### PROJECT DESCRIPTION

Orange County Waste & Recycling (OCWR) proposes a green waste composting operation at the Olinda Alpha Landfill (Landfill) called the Valencia Greenery. The implementation of the project would allow OCWR to compost a maximum of 230 tons per day of processed green material (PGM) at the Landfill, thereby assisting the State, Orange County cities, and unincorporated Orange County areas in meeting Senate Bill (SB) 1383 and Assembly Bill (AB) 1594 requirements for organic waste recycling. The project would be developed on an approximately 9-acre pad located at the northeastern portion of the Landfill in an area that is not currently being used for active landfilling. Figure 1 (all figures provided in Attachment A) shows the project location. A crushed asphalt base would be placed over the entire area that would be used for PGM storage and for composting operations.

The project would be developed in two phases. Phase 1 would include the construction of the civil components of the facility, including the construction of a composting deck, a lined storm water pond, a fire water supply system, and expansion of the existing operation's water tanks to provide water for the composting operation. During Phase 1, open windrow composting would be utilized. With open windrow composting, the PGM is placed in long rows called windrows. The windrows are turned (using a compost windrow turner or front-end loader) to improve porosity and oxygen content, mix in or remove moisture, and redistribute cooler and hotter portions of the pile. Phase 2 of construction would include installation of equipment, piping, and solar panels that constitute the Covered Aerated Static Pile (CASP) composting system. The CASP system consists of an automated system that blows air into the compost, which is covered with a synthetic semipermeable cover. According to the California Department of Resources Recycling and Recovery (CalRecycle), covering compost piles with breathable fabrics can help reduce water needs during hot, dry weather and may help avoid soggy, anaerobic piles during periods of heavy rain. Figure 2 shows the site plan.

## TRANSPORTATION ANALYSIS

This section includes an analysis of the project's impacts to the transportation system based on the significance thresholds of the *State CEQA Guidelines* and provides a thorough justification for the conclusions provided herein.

### Regulatory Setting

The following is a summary of State, regional, and local regulations that apply to transportation and circulation within the project study area.

#### State

**Senate Bill 743.** On September 27, 2013, Governor Jerry Brown signed SB 743 into law and codified a process that revises the approach to determining transportation impacts and mitigation measures under CEQA. SB 743 directed the Governor's Office of Planning and Research (OPR) to administer new CEQA guidance for jurisdictions by replacing the focus on automobile vehicle delay and level of service (LOS) or other similar measures of vehicular capacity or traffic congestion in the transportation impact analysis with vehicle miles traveled (VMT). This change shifts the focus of the transportation impact analysis from measuring impacts to drivers, such as the amount of delay and LOS at an intersection, to measuring the impact of driving on the local, regional, and statewide circulation system and the environment. This shift in focus is expected to better align the transportation impact analysis with the statewide goals related to reducing greenhouse gas emissions, encouraging infill development, and promoting public health through active transportation. As a result of SB 743, the California Office of Administrative Law cleared the revised *State CEQA Guidelines* for use on December 28, 2018 with a statewide implementation date of July 1, 2020. The 2018 OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA*<sup>1</sup> provides a resource for agencies to use at their discretion.

#### Regional

**Orange County Transportation Authority.** The Orange County Transportation Authority (OCTA) is an agency that serves as transportation planner and coordinator, designer, builder and operator for the 34 cities and unincorporated areas of Orange County. As a State-designated regional transportation planning agency for the County of Orange (County), OCTA is tasked with the development, conformance monitoring, and biennial updating of Orange County's Congestion Management Program. OCTA is responsible for the funding of transportation projects, including highway, transit, local road, bicycle, pedestrian, and trail projects.

#### Local

The *City of Brea Transportation Impact Analysis Guidelines*<sup>2</sup> is the guidance document for the citywide transportation system. These guidelines are intended to ensure that the traffic impacts of a development proposal are adequately addressed. The *City of Brea Transportation Impact Analysis*

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<sup>1</sup> Governor's Office of Planning and Research (OPR). 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December.

<sup>2</sup> City of Brea. 2020. *City of Brea Transportation Impact Analysis Guidelines*. September.

*Guidelines* state that projects that would not exceed 50 trips during any peak hour do not require an LOS analysis. In addition, the *City of Brea Transportation Impact Analysis Guidelines* state that projects that generate fewer than 110 daily trips are screened from a VMT analysis and are presumed to have a less-than-significant transportation impact.

## Environmental Setting

### *Existing Circulation System*

Valencia Avenue is a two- to four-lane Primary Arterial that provides direct access to the Landfill. Sidewalks and on-street parking are not provided in the vicinity of the project.

## Impact Analysis

### *Trip Generation*

In order to assess the impact of the project on the surrounding circulation system, LSA calculated the project trips that would be generated for temporary construction activities and typical operations based on the estimated number of trucks and workers. Typical operations of the 230 tpd composting project include the net increase in vehicle (worker and truck) trips of the Landfill resulting from the incoming feedstock and delivery of finished product in order to meet SB 1383 and AB 1594 requirements for organic waste recycling. It should be noted that the Landfill was accepting approximately 746 tons per day of PGM (38 loads, or 76 trips, per day using 20-ton trucks) for erosion control prior to the implementation of SB 1383 and AB 1594. In order to provide a conservative, worst-case estimate for project trip generation, the truck trips associated with erosion control (that would cease to occur with the project), were not reduced from the total trip generation.

Based on information from the applicant, construction and operation of the project will include the following two phases (with phase durations and daily truck and worker estimates):

- **Phase 1 Construction** (9.5 weeks): up to 18 workers per day
- **Phase 1 Operations** (6 months): 5 workers and 4 delivery trucks per day
- **Phase 2 Construction** (13.5 weeks): up to 18 workers per day
- **Overlap of Phase 1 Operations and Phase 2 Construction** (9.5 weeks): up to 23 workers and 4 delivery trucks per day
- **Phase 2 Operations** (ongoing): 5 workers and 12 delivery trucks per day

A passenger car equivalent (PCE) factor of 2.0 has been applied to the delivery trucks. Truck trips would occur throughout the day. It is assumed that workers would arrive at the site prior to the a.m. peak hour and depart the site during the p.m. peak hour given the current Landfill hours of operation from 6:00 a.m. to 4:00 p.m., Monday through Saturday.

Table A (provided in Attachment B) presents the construction and operational trip generation for the project.

As shown in Table A, the overlap of Phase 1 Operations and Phase 2 Construction represents the highest trip generation of the project. Although the overlap of Phase 1 Operations and Phase 2

Construction is anticipated to last for 13.5 weeks, the peak trip-generating period during this overlap is 3.5 weeks. During this 3.5-week period, the overlap of Phase 1 Operations and Phase 2 is forecast to generate 62 average daily trips (ADT), including 23 outbound trips in the p.m. peak hour.

During typical operations of the project, Phase 2 Operations would generate 58 ADT, including 4 trips (2 inbound and 2 outbound) in the a.m. peak hour and 9 trips (2 inbound and 7 outbound) in the p.m. peak hour.

The anticipated project trips for construction and operations are lower than the existing erosion control trips (152 ADT, in PCEs, generated by 38 daily trucks) that would no longer occur with the project.

#### *Traffic Impact Analysis Requirement*

As stated above, a TIA is required if a project generates 50 or more peak-hour trips (LOS analysis) or 110 or more daily trips (VMT analysis). Because the project would generate fewer than 50 peak-hour trips and fewer than 110 daily trips for temporary construction activities and typical operations, a TIA is not required. Based on the low daily and peak-hour trip generation for both construction and operations, the project is not anticipated to result in any LOS or operational deficiencies to the surrounding circulation system.

The City's General Plan<sup>1</sup> provides goals and policies to ensure that the City maintains a safe and efficient transportation network, and a variety of mobility choices are available throughout Brea. The City's goals incorporate an effective regional transportation network; provide a safe and efficient circulation system; promote and support an efficient public transportation system; and provide an extensive, integrated, and safe bicycle, hiking, and pedestrian network throughout Brea. The project would not generate a substantial number of daily or peak-hour vehicle trips for construction or typical operations to warrant modifications to any transportation facilities (e.g., vehicular, transit, bicycle, or pedestrian). Therefore, the project would not conflict with the City's General Plan. No mitigation is required.

#### *Vehicle Miles Traveled*

*State CEQA Guidelines* Section 15064.3, Subdivision (b), states that for land use projects, transportation impacts are to be measured by evaluating the project's VMT, as outlined in the following:

*Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.*

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<sup>1</sup> City of Brea. 2003. General Plan.

Based on the *City of Brea Transportation Impact Analysis Guidelines*, projects that generate fewer than 110 daily trips are screened from a VMT analysis. Because the project would generate fewer than 110 daily trips for construction and typical operations, it meets the City's screening criteria for a VMT analysis. As such, the project is presumed to have a less-than-significant transportation impact.

According to the County's Final Draft Guidelines for Evaluating Vehicles Miles Traveled under CEQA,<sup>1</sup> public services and facilities that support community health, safety, or welfare are screened from a VMT analysis. Such facilities include fire stations, police/sheriff stations, jails, community centers, refuse stations, and landfills (i.e., Olinda Alpha Landfill). These facilities are already a part of the community, and as a public service, the VMT is accounted for in the existing regional average.

In addition, the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* makes it clear that VMT is measured for "automobiles," which are "on-road passenger vehicles, specifically cars and light trucks."<sup>2</sup> As such, heavy trucks (delivery trucks) are not included in the VMT for the project. Therefore, the project is screened from a VMT analysis and would not conflict or be inconsistent with *State CEQA Guidelines* Section 15064.3(b). Potential impacts would be less than significant, and no mitigation is required.

#### *Vehicle Access*

Valencia Avenue would provide direct access to the project site. Improvements are not required to accommodate construction or operational traffic along this roadway. All emergency access routes to the project site and adjacent areas would be kept clear and unobstructed during all phases of construction and operations. No roadway closures or lane closures are anticipated as part of project construction, and traffic volumes resulting from construction and operational vehicles would not impede traffic flow on the surrounding circulation system. Based on the temporary nature of the construction activities and trips, and the low trip generation for daily operations, project vehicles are unlikely to create operational deficiencies or LOS impacts to the public roadway (Valencia Avenue) when accessing the project site.

In addition, adequate visibility (without any site obstructions) is currently provided along Valencia Avenue for all vehicles to safely access the project site. Given the existing Landfill and the proposed composting operation within the Landfill, the project would not substantially increase hazards for vehicles due to a geometric design feature or incompatible uses. The project would not result in inadequate emergency access. Therefore, no mitigation is required.

Attachments: A: Figures 1 and 2  
B: Table A

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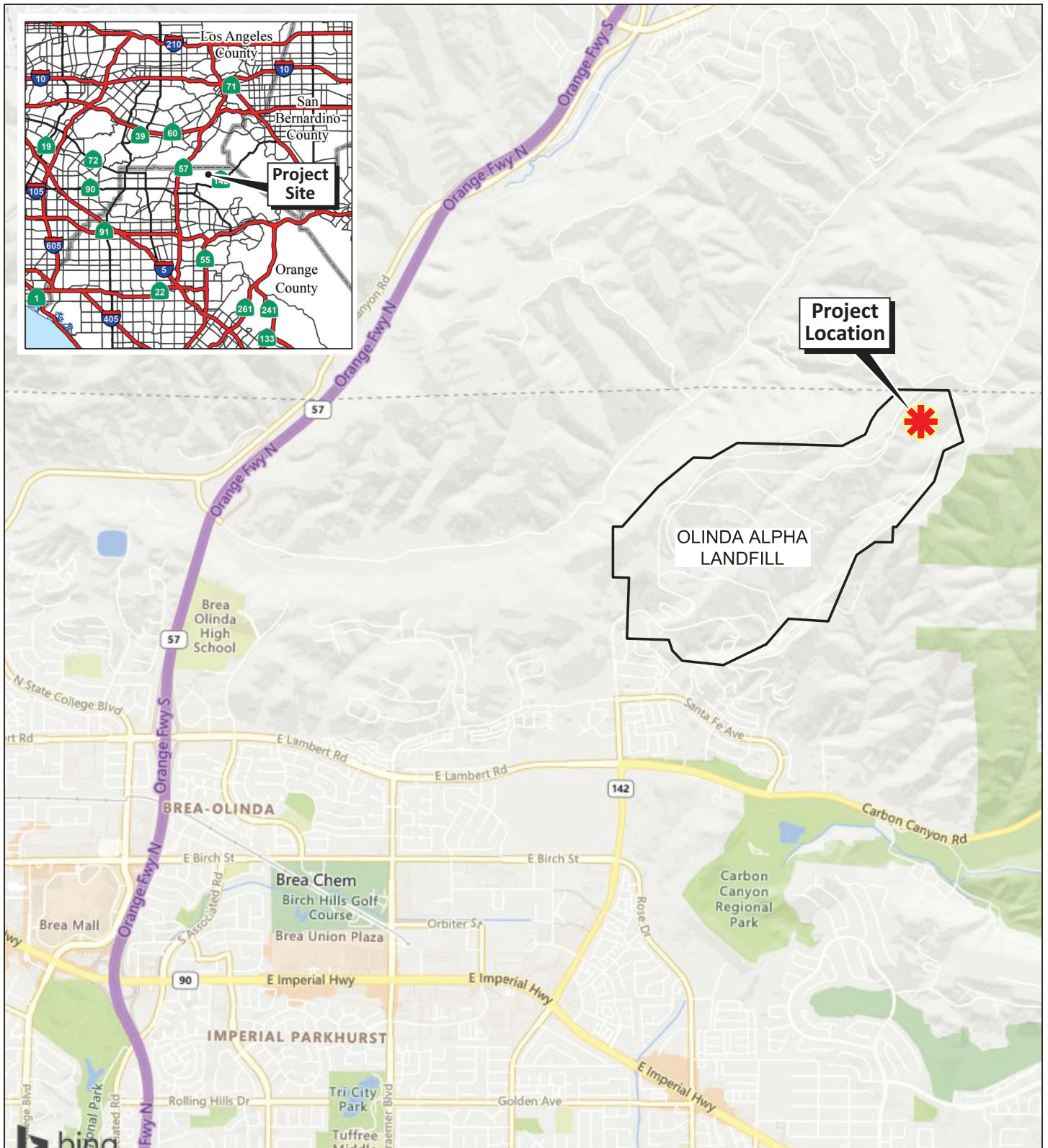
<sup>1</sup> LSA Associates, Inc. 2020. Final Draft Guidelines for Evaluating Vehicles Miles Traveled under CEQA.

<sup>2</sup> Governor's Office of Planning and Research (OPR). 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December.

## **ATTACHMENT A**

### **FIGURES 1 AND 2**



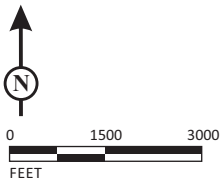


**Project Location**

OLINDA ALPHA  
LANDFILL

**LSA**

FIGURE 1



SOURCE: Bing Maps

*Valencia Greenery Project*  
Project Location



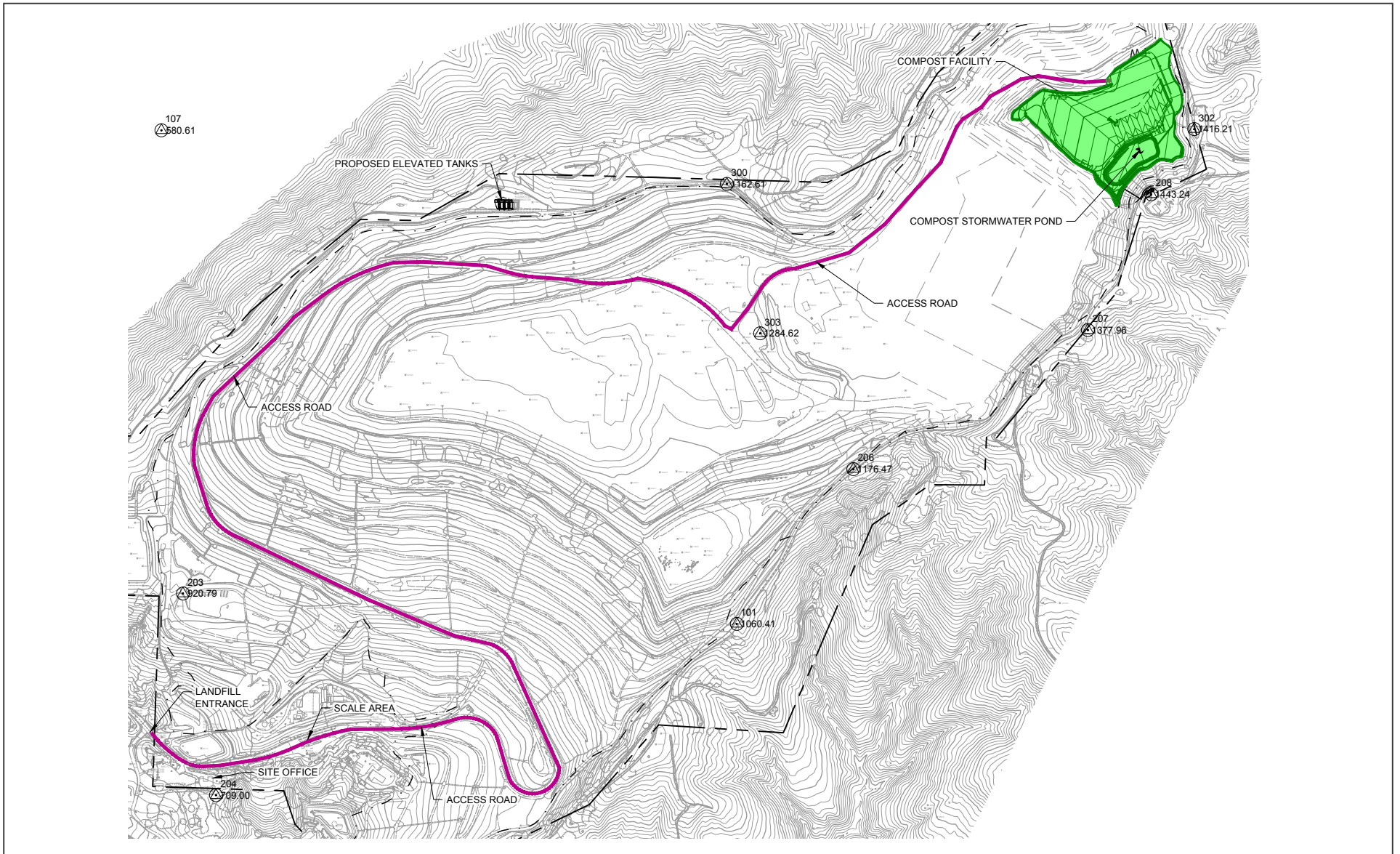
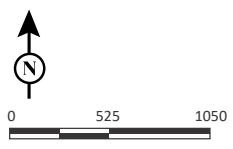


FIGURE 2

LSA



SOURCE: Tetra Tech

Valencia Greenery Project  
Site Plan



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## ATTACHMENT B

### TABLE A

**Table A: Valencia Greenery Trip Generation Summary**

Phase 1 Construction		Daily Vehicles				ADT	AM Peak Hour			PM Peak Hour			
Description	Duration <sup>1</sup>	Description	No.	Type	PCE		in	out	total	in	out	total	
A	Site Preparation	2.5 weeks	Workers <sup>2</sup>	18	Passenger	1	36	0	0	0	0	18	18
			<b>Total</b>				<b>36</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>18</b>	<b>18</b>
B	Grading	5 weeks	Workers <sup>2</sup>	15	Passenger	1	30	0	0	0	0	15	15
			<b>Total</b>				<b>30</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>15</b>	<b>15</b>
C	Paving	2 weeks	Workers <sup>2</sup>	15	Passenger	1	30	0	0	0	0	15	15
			<b>Total</b>				<b>30</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>15</b>	<b>15</b>

Phase 1 Operations		Daily Vehicles				ADT	AM Peak Hour			PM Peak Hour		
Description	Duration <sup>3</sup>	Description	No.	Type	PCE		in	out	total	in	out	total
Windrow Composting	6 months	Workers <sup>2</sup>	5	Passenger	1	10	0	0	0	0	5	5
		Delivery Trucks <sup>2</sup>	4	Large Truck	2	16	0	0	0	0	0	0
		<b>Total</b>				<b>26</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>5</b>

Phase 2 Construction		Daily Vehicles				ADT	AM Peak Hour			PM Peak Hour			
Description	Duration <sup>4</sup>	Description	No.	Type	PCE		in	out	total	in	out	total	
A	Site Preparation	3.5 weeks	Workers <sup>2</sup>	18	Passenger	1	36	0	0	0	0	18	18
			<b>Total</b>				<b>36</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>18</b>	<b>18</b>
B	Grading	6 weeks	Workers <sup>2</sup>	15	Passenger	1	30	0	0	0	0	15	15
			<b>Total</b>				<b>30</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>15</b>	<b>15</b>
C	Paving	4 weeks	Workers <sup>2</sup>	15	Passenger	1	30	0	0	0	0	15	15
			<b>Total</b>				<b>30</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>15</b>	<b>15</b>

Overlap of Phase 1 Operations and Phase 2 Construction		Daily Vehicles				ADT	AM Peak Hour			PM Peak Hour			
Description	Duration <sup>3,4</sup>	Description	No.	Type	PCE		in	out	total	in	out	total	
A	Windrow Composting and Site Preparation	3.5 weeks	Workers <sup>2</sup>	23	Passenger	1	46	0	0	0	0	23	23
			Delivery Trucks <sup>2</sup>	4	Large Truck	2	16	0	0	0	0	0	0
			<b>Total</b>				<b>62</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>23</b>	<b>23</b>
B	Windrow Composting and Grading	6 weeks	Workers <sup>2</sup>	20	Passenger	1	40	0	0	0	0	20	20
			Delivery Trucks <sup>2</sup>	4	Large Truck	2	16	0	0	0	0	0	0
			<b>Total</b>				<b>56</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>20</b>
C	Windrow Composting and Paving	4 weeks	Workers <sup>2</sup>	20	Passenger	1	40	0	0	0	0	20	20
			Delivery Trucks <sup>2</sup>	4	Large Truck	2	16	0	0	0	0	0	0
			<b>Total</b>				<b>56</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>20</b>

Phase 2 Operations		Daily Vehicles				ADT	AM Peak Hour			PM Peak Hour		
Description	Duration <sup>5</sup>	Description	No.	Type	PCE		in	out	total	in	out	total
CASP Composting	ongoing	Workers <sup>2</sup>	5	Passenger	1	10	0	0	0	0	5	5
		Delivery Trucks <sup>2</sup>	12	Large Truck	2	48	2	2	4	2	2	4
		<b>Total</b>				<b>58</b>	<b>2</b>	<b>2</b>	<b>4</b>	<b>2</b>	<b>7</b>	<b>9</b>

<sup>1</sup>Phase 1 construction is anticipated to occur from March 22 to May 25, 2022.  
<sup>2</sup>Workers are assumed to arrive prior to the a.m. peak hour and depart during the p.m. peak hour. Truck trips are assumed to occur throughout the day.  
<sup>3</sup>Phase 1 is anticipated to operate from May 25 to November 24, 2022.  
<sup>4</sup>Phase 2 construction is anticipated to occur from August 24 to November 24, 2022.  
<sup>5</sup>Phase 2 is anticipated to commence operations on November 24, 2022.  
AC = architectural coating  
ADT = average daily trips  
CASP = covered aerated static pile  
PCE = passenger car equivalent. A worker vehicle has a PCE of 1 and a truck has a PCE of 2.