

TECHNICAL MEMORANDUM

From: Frederik Venter, P.E. and Jacob Mirabella
Kimley-Horn and Associates
10 South Almaden, Suite 1250
San Jose, CA 95113

To: Shawn Milligan
Genflora, LLC
21710 Stevens Creek Boulevard, Suite 200
Cupertino, CA 95014

Date: May 19, 2020

Re: **Traffic Study for Uesugi Farms Site**
Hemp Storage/Processing and CBD Oil Extraction Land Use Change
Santa Clara County, California

This technical memorandum represents the traffic evaluation that was conducted to assess the potential trip generation affects that would result from the proposed site use changes at Uesugi Farms, which is located at 1020 CA-25 in Santa Clara County, California. The Project proposes to convert building D, which currently packs fruits and vegetables (produce), into a hemp processing and CBD oil extraction facility. In addition, buildings B and H are currently used to store produce but will instead be used to store hemp as part of the proposed Project. This traffic study includes an evaluation of the Project's trip generation potential, as well as a discussion on the potential vehicle miles traveled (VMT) changes attributable to the Project.

Summary of Findings

The existing Project site consists of six existing buildings that store and process fruits and vegetables (produce). The site was approved in June 2006 to construct additional buildings and the total approved building gross floor area (GFA) for the site includes up to 47,380 square feet of land uses that store and process produce. Furthermore, the site is approved to allow up to 40 employees onsite per day and operate from 6:00am to 7:00pm, Monday through Saturday. Harvesting seasonality is by default part of the use permit due to the associated land use activity. Not all the buildings have been constructed as approved in the 2006 use permit.

The Project proposes to use seven of the eight approved buildings (the approved 700 square foot building F, as previously approved under the 2006 permit, would still not be constructed as part of this use application). The proposed Project would allow up to 40 employees onsite per day (the same number of employees as previously approved), as well as conduct operations from 6:00am to 7:00pm, Monday through Saturday, which is consistent with the 2006 conditions of approval. The Project proposes to store and process hemp instead of produce, and extract canniboid (CBD) oil on the site. The total building GFA of the proposed Project is 46,680 square feet, which is consistent with the 2006 permit.

This evaluation indicates that the proposed Project would generate the same number of trips for the built and approved buildings on the site. If building F is eventually built, no additional employees will be hired on the site and the building will be part of daily operations.

The delivery of hemp, and the distribution of CBD oil trips are anticipated to be consistent with the approved 2006 permit since no building expansion is planned. Thus, the proposed Project would not generate any additional trips. The general geographic location for growth of hemp and the distribution of CDB oil is anticipated to be the same as for fresh produce, and as such, no increase in vehicle miles traveled (VMT) is anticipated and the project wouldn't trigger any VMT transportation impacts.

Introduction

The Project site is located along CA-25, approximately 1 ½ miles east of US 101, in Santa Clara County, California. The Project site's address is 1020 CA-25. The Project location is shown in **Figure 1**.



Figure 1 – Project Location

The Project site consists of eight approved buildings (six buildings currently exist onsite and two buildings are approved for future construction) and is currently approved to store and process a variety of vegetables and fruits (produce). The Mitigated Negative Declaration that was adopted in June 2006 and

serves as the basis for the approved land use assumptions is included in the **Appendix**. The approved site's land uses include a variety of light industrial related uses and the Project proposes to change the use of approved buildings B and H from fruit and vegetable (produce) storage to hemp storage. In addition, building D's use is proposed to change from produce packing to hemp processing and cannabidiol (CBD) oil extraction.

No external modifications or expansions are proposed for any of the existing or approved buildings. All existing buildings will be utilized by the proposed Project. Building F, which is not yet built, will not be constructed as part of the Project. The approved and proposed uses are summarized in **Table 1**. The Project site plan is shown in **Figure 2**.

Table 1 – Approved and Proposed Land Use Summary

Building	Approved Building Gross Floor Area	Approved Use (Baseline)	Proposed Building Gross Floor Area	Proposed Use (Project) ¹
A	3,328 SF	Office	3,328 SF	Office
B	5,600 SF	Cooler (Produce)	5,600 SF	Cooler (Hemp)
C	1,432 SF	Pressure Cooler	1,432 SF	Pressure Cooler
D	8,500 SF	Packing (Produce)	8,500 SF	Processing (Hemp) and Extraction (CBD Oil)
E	1,320 SF	Refrigeration Room (Equipment)	1,320 SF	Refrigeration Room (Equipment)
F	700 SF	Trucker Lounge (Not Built)	– ²	– ²
G	1,500 SF	Dispatch Office (Not Built)	1,500 SF ³	Dispatch Office ³
H	25,000 SF	Cooler (Produce)	25,000 SF	Cooler (Hemp)
Total	47,380 SF		46,680 SF	

1. **Bolded green text** indicates where the proposed use deviates from approved use.

2. Approved Building F will not be constructed as part of the proposed Project.

3. Approved Building G will be constructed as part of the Project, consistent with the 2006 CUP.

As described in the table above, the Project proposes to utilize the already approved buildings at the Project site, except for build F. The following section provides more detail on the site operations and trip generation potential.

Trip Generation Analysis

Trip generation estimates were developed for this traffic study using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition.

As described in the introduction section of this memorandum, the approved use consists of eight buildings that are currently used for storing, processing, and packing a variety of fruits and vegetables. The site also includes a small office space and equipment storage spaces that support the approved produce storage and processing facilities. Thus, the overall site can be characterized as light industrial.

Approximately 47,380 square feet of building gross floor area (GFA) were approved, as well as up to 40 employees onsite per day and hours of operations 6:00am to 7:00pm Monday through Saturday. The Project proposes to utilize the approved buildings and to also allow up to 40 employees onsite per day. In addition, the proposed use will utilize the same hours of operations as the approved, which is 6:00am to 7:00pm.

Based on the approved and proposed land use and operational conditions, ITE land use 110 (light industrial) is appropriate for weekday trip generation estimates. Furthermore, the proposed site will utilize all approved buildings (except for Building F, which will result in net change in utilized GFA of -700 square feet). In addition, the proposed use will allow up to the approved number of employees (40 employees) onsite per day, adhere to the approved hours of operation (Monday through Saturday – 6:00am to 7:00pm), and continue to operate as light industrial by storing and processing hemp instead of fruits and vegetables. Thus, it is anticipated that the approved site would generate roughly the same number of daily, AM peak hour, and PM peak hour weekday trips as the approved use.

As published in ITE, light industrial land uses generate approximately 4.96 daily weekday trips per 1,000 square feet of building GFA. In addition, light industrial land uses generate approximately 0.70 weekday AM peak hour trips per 1,000 GFA and 0.63 weekday PM peak hour trips per 1,000 GFA. AM and PM peak hour trip generation rates are used to estimate the one-hour AM and one-hour PM peak trips that would occur during the local transportation network peak (i.e. adjacent street peak), which typically occurs from 7:00am to 9:00am and from 4:00pm to 6:00pm on weekdays.

Table 2 indicates the trip generation estimates for the approved and proposed uses assuming the approved 47,380 square feet of GFA. Using these rates, it is estimated that the approved and proposed land uses generate approximately 236 daily trips, 33 AM peak hour trips (29 in / 4 out), and 30 PM peak hour trips (4 in / 26 out). As described above, the proposed land use will utilize the same buildings, employees, and hours of operations (but at this time would not construct building F). These trips include employee trips as well as truck deliveries and pickups.

Table 2 – Site Trip Generation Estimates (Weekdays)

Land Use	Size	Units	Daily Trip Rate	Daily Trips	AM Peak Hour Rate ³	AM Peak Hour Trips (IN/OUT)	PM Peak Hour Rate ³	PM Peak Hour Trips (IN/OUT)
Approved and Proposed Conditions¹								
Light Industrial (LU 110)	47,380	KSF ²	4.96	236	0.70	33 (29/4)	0.63	30 (4/26)

Source: *Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition (2017)*

1. Trip generation estimates based on ITE average rates.
2. KSF = 1,000 Square Feet
3. Peak hours occur during the adjacent street AM and PM peak (7:00am-9:00am and 4:00pm-6:00pm).

Trips per employee can also be used to estimate a site's trip generation potential. The 236 daily trips indicated in **Table 2** is equivalent to approximately 5.90 weekday daily trips per employee (236 weekday trips/40 employees per weekday = 5.90). In this case, employees would be the independent trip generation variable, but includes all trips to/from the site (i.e. truck deliveries and pickups). This result appears reasonable. The Project site is located in a rural area and most employees will make one trip to the site in the morning and one trip leaving the site in the evening, generating roughly two trips per employee per weekday (80 daily trips total), while the remaining 156 weekday trips (236 total weekday trips – 80 employee weekday trips = 156) would be attributed to hemp deliveries and CBD oil distribution pickups.

Based on knowledge of the area, traffic in the Project vicinity peaks on weekdays. In addition, the approved and proposed uses will generate peak trips during weekdays. While the Project will generate some trips on Saturdays, the above evaluation represents peak traffic generated by the Project site when the local transportation network also experiences peak traffic demand.

Note that the above analysis does not assume any reductions for carpooling, bike, or pedestrian trips.

Vehicle Miles Traveled Evaluation

In 2018, the California state legislature, in approving SB 743, directed the Office of Planning and Research (OPR) to develop guidelines for assessing transportation impacts based on vehicle miles traveled, or VMT. In response to SB 743, the California Environmental Quality Act (CEQA) and its implementing guidelines (CEQA Guidelines) were significantly amended regarding the methods by which lead agencies are to evaluate a project's transportation impacts. As described in CEQA Guidelines Section 15064.3(a):

Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact.

This section of the Guidelines continues to set forth the criteria for analyzing transportation impacts, acknowledging that lead agencies will need to adjust to these new requirements and provide ample flexibility about how such an analysis would be conducted. As of this writing, land use agencies across California are working to develop their own "thresholds" for measuring VMT in order to comply with these changes in CEQA. Currently, the Santa Clara County is studying their own thresholds, but none have been adopted at the time of this writing.

As indicated in the Trip Generation Analysis section of this document, the proposed site changes will not generate new trips above the already approved site uses.

The delivery of hemp, and the distribution of CBD oil trips are anticipated to be the same as the approved 2006 permit since no building expansion is planned. Thus, the proposed Project would not generate any additional trips. The general geographic location for growth of hemp and the distribution of CBD oil is anticipated to be approximately the same as fresh produce, and as such, no increases in vehicle miles traveled or VMT transportation impacts are anticipated for the proposed Project.

APPENDIX

County of Santa Clara

Department of Planning & Development
County Planning Office
County Government Center, East Wing, 7th Floor
70 West Hedding Street
San Jose, California 95110
(408) 299-5770 FAX (408) 288-9198

TO BE FILED	
Job #	03005
File	4-C
By	KEY



Notice of Intent to Adopt a Mitigated Negative Declaration

Per the California Environmental Quality Act (CEQA), this notice has been prepared to inform you that the following project will not have a significant effect on the environment.

File Number	TAZ	APN(s)	Date
5994-80-11-03P-03A-05G-04EA	340	841-37-027	6/14/06
Project Type		Project Land Use	
Use Permit , Architectural and Site Approval, Grading Permit		agriculture ,	
Owner		Applicant	
Uesugi Farms		Belli Architectural Group	
Project Location			
Unincorporated area of Santa Clara County by Gilroy. Address: 1020 Highway 25.			

Project Description

The application is for a Use Permit and Architectural and Site Approval to construct a cold-storage building to accommodate a change-in-industry requirement at an existing commercial produce distribution center at 1020 Hwy. 25, in Gilroy. The project includes construction of a 25,000 s.f. cold storage building with an attached refrigeration room, dispatch room, trucker's lounge, and nine (9) loading docks. The applicant also proposes to maintain most of existing buildings (for office, packing and storage uses) and to add (9) new parking and truck loading spaces.

Because the subject site is located within the FEMA 100-year floodplain, approximately 18,360 c.y. of fill and 1,260 of cut in grading is necessary to elevate the new structure to be above the flood elevation. In addition, to mitigate the increase in runoff from the proposed development; the applicant proposes to implement a new detention basin located along the southwest side of the property that will temporarily store all storm water from the site. Discharge from the detention basin then will be drained through a pump system across an existing river levee to Carnadero Creek.

The owner, Uesugi Farms, specializes in packing and storing produce prior to shipping. There is no washing or processing produces onsite. The facility will be open from 6am to 7pm, Mondays through Saturday, with maximum 40 employees. The new refrigeration room shall be used to store produce products (Napa cabbage, bell peppers, strawberries, and chile peppers). More storage space would be accommodated for with the addition of the 25,000 sq. ft. building. With the existing operations, the lack of space requires shipping produce to other off-site cold storage facilities. With the added expansion, shipping off-site to other cold storage facilities would not be necessary.

The owner has provided storage capacity information pertaining to the existing versus projected storage for the agricultural produce (stored and packed on-site) as follows:

Napa Cabbage (measured in 70 pound equivalents)
Existing 85,780 cartons, Projected 122,500 cartons

Bell Peppers (measured in 25 pound equivalents)
Existing 602,000 cartons, Projected 1,001,125 cartons

Strawberries (measured in 12-pint equivalents)
Existing: 108,000 cartons, Projected: 150,000 cartons

Chile Peppers (measured in 40 pound equivalents)
Existing: 250,800 cartons, Projected: 501,760

Purpose of Notice

The purpose of this notice is to inform you that the County Planning Staff has recommended that a Mitigated Negative Declaration be approved for this project. County of Santa Clara Planning Staff has reviewed the Initial Study for the project, and based upon substantial evidence in the record, **finds that the proposed project could not have a significant effect on the environment.**

Approval of this proposed Mitigated Negative Declaration for the proposed project is tentatively scheduled

Board of Supervisors Chairpersons. It should be noted that the approval of a Mitigated Negative Declaration does not constitute approval of the project under consideration. The decision to approve or deny the project will be made separately.

Public Review Period:

Begins: 6/7/06

Ends: 7/4/06

Public Comments regarding the correctness, completeness, or adequacy of this Mitigated Negative Declaration are invited and must be received on or before the end of the review period listed above. Such comments should be based on specific environmental concerns. Written comments should be addressed to **Colleen Oda, Planner II: County of Santa Clara Planning Office, County Government Center, 70 W. Hedding Street, San Jose, CA 95110, Tel: (408) 299-5797**. A file containing additional information on this project may be reviewed at the Planning Office under the file number appearing at the top of this form.

The Mitigated Negative Declaration and Initial Study may be viewed at the following locations:

1. Santa Clara County Planning Office, 70 West Hedding Street, East Wing, 7th Floor, San Jose, CA 95110
2. Santa Clara County Planning Office website, <http://www.sccplanning.org> under Environmental Documents
3. Gilroy Library, 7387 Rosanna Street, Gilroy, CA 95020

Other Agencies sent a copy of this document

Santa Clara County Planning Commission, Santa Clara County: Environmental Health Dept., Land Development Engineering Office, Non-Point Source Pollution Control Program, Fire Marshal's Office, Santa Clara Valley Water District, South County Joint Planning Advisory Commission, Pajaro River Watershed Flood Prevention Authority

Basis for Negative Declaration Recommendation

County of Santa Clara Planning Staff has reviewed the Initial Study for the project, and based upon substantial evidence in the record, finds that **although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case since mitigation measures have been added to the project.** (See italic print).

This finding is based in the following considerations (see note below) * = mitigation measure

CULTURAL RESOURCES

The California Historical Resources Northwest Information Center (NWIC) indicated that the proposed project area contains or is adjacent to an archaeological site. Numerous previous studies have examined portions of the site as they relate to previously proposed projects. The NWIC recommended that a qualified archaeologist assess the project and its potential impacts to archaeological resources on the site and implement some form of enhanced identification program in portions of the site not previously tested to determine the need for further testing and/or mitigation, if warranted.

MITIGATION:

To mitigate potential archaeological impacts, the following mitigation measures shall be implemented as recommended by the archaeological reports, and required by County Code:

- (1) **A qualified archaeological monitor shall be present during all construction activities that involve native soil disturbance (i.e. grading etc.). Evidence of complying with this mitigation shall be in the form of the following requirements:*
 - a. Final grading plans shall contain language indicating that subsurface cultural resources may be present on the property and that monitoring by a qualified archaeologist is required during construction.*
 - b. Prior to issuance of final grading permit, submit evidence of a contract with a qualified archaeologist to perform monitoring during construction.*
 - c. Prior to release of the bond for the improvements, a report must be submitted for approval to the Planning Office by the consulting archaeologist summarizing the results of the monitoring and any remediation measures taken during construction, if necessary. Submit two (2) copies of the report. One shall be distributed to the Northwest Information Center for their records.*

- (2) * If at any time, midden soil, cultural features or potentially significant cultural resources (i.e. archaeological), or human remains are discovered, work shall be halted within 150 ft. of the find until it can be evaluated for significance by the monitor and/or the principal archaeologist, and if determined to be significant under CEQA

Office), and implemented. Mitigation would involve, at a minimum, recovery and analysis of cultural materials and might include analysis of lithic materials, radiocarbon dating of shell fragments, bead analysis etc. as determined by the archaeologist.

- (3) ~~*In the event that human skeletal remains are encountered, the applicant is required by County Ordinance No. B6-18 to immediately notify the County Coroner. Upon determination by the County Coroner that the remains are Native American, the coroner shall contact the California Native American Heritage Commission, pursuant to subdivision (c) of section 7050.5 of the Health and Safety Code and the County Coordinator of Indian affairs. No further disturbance of the site may be made except as authorized by the County Coordinator Of Indian Affairs in accordance with the provisions of state law and this chapter. If artifacts are found on the site a qualified archaeologist shall be contacted along with the County Planning Office. No further disturbance of the artifacts may be made except as authorized by the County Planning Office. If human skeletal remains are encountered, the designated Most Likely Descendant will provide recommendations for mitigation of Native American human remains. Cultural materials recovered during monitoring and mitigation if necessary, will be curated in the public domain at a suitable research facility. Archaeologist shall make determination.~~

HYDROLOGY & WATER QUALITY

The property is located within a FEMA 100 yr. Flood Zone, SCVWD 100 yr. Flood Zone, and Soap Lake's 2 yr, 10 yr, 25 yr, 50 yr and 100 yr Flood Zones. Carnadero creek is located directly adjacent to the site along the east side, and the site is located with the Pajaro River Watershed. The site is serviced by a septic system permitted by the County Dept. of Environmental Health, and domestic water system permitted by the CA Dept. of Health Services – Drinking Water Division.

A hydrological floodplain development analysis was submitted as required to evaluate potential flooding impacts of the proposal. The report concludes that the project will create new runoff resulting only in an increase of 0.3 inches in the 100-year floodplain water surface if a new detention basin is added. Questa indicates that a 0.3 inches increase is insignificant.

MITIGATION:

(4). *To mitigate the increase of runoff from the proposed development, the applicant proposes to implement a new detention basin located along the southwest side of the property that will temporarily store all site storm water. Discharge from the detention basin then will be drained through an existing pump system that crosses through the river levee to Carnadero Creek. No creek permits are required for this work since there are no activities that would divert or obstruct the stream channel (no alterations to the creek proposed). The new detention facility would utilize the existing levee. The pumped discharge will be transferred to an existing pipe that crosses through the river levee and discharged into the creek.

Prepared by:
Colleen Oda, Planner II

Colleen A. Oda
Signature

9/14/06
Date

Approved by:
Rob Eastwood, Senior Planner

RAEA
Signature

9/14/06
Date



400 0 400 800 Feet



Uesugi Farms Use Permit / ASA / Grading County File# 5994-80-11-03P-03A-05G-04EA Project Location Map



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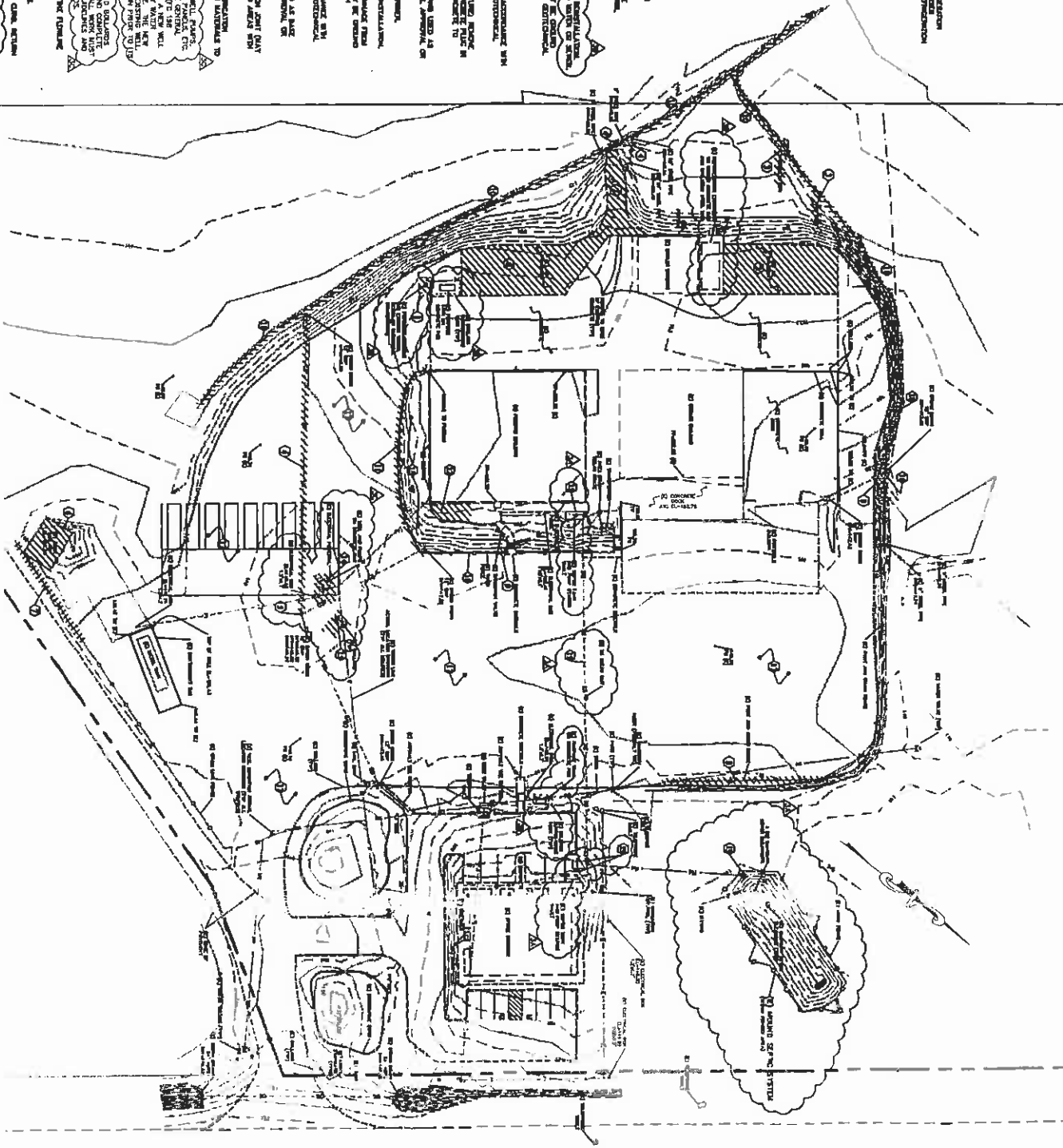
This map was created by the Santa Clara County Planning Office. The Geographic Information System files were compiled from various sources. While deemed reliable, the Planning Office assumes no liability.

- TO:
FROM:
SUBJECT:

KELNOTES

- MAN FROM BOSTON/ALABAMA
B - NO MATCH ON SEALS
HE MAY BE COUNCIL
AS WITH GEORGE/ALABAMA

- [illegible]



HIGHWAY 25/HOLLISTER ROAD

GRAPHIC SCALE

(20 FEET)

1 inch = 20 ft.



DEMOLITION PLAN
SCALE: 1"=5'

PRELIMINARY GRADING PLANS

11-00000

C2

DEMOLITION PLAN

UESUGI FARMS

2000

1000



Bell Architectural Group
BUILDING INNOVATIONS

313 S. Main Street
Suite 100
San Jose, CA 95128
Phone (408) 434-4400
Fax (408) 434-4401

REVISIONS DATE	BY	DESCRIPTION
11-00000	C2	DEMOLITION PLAN

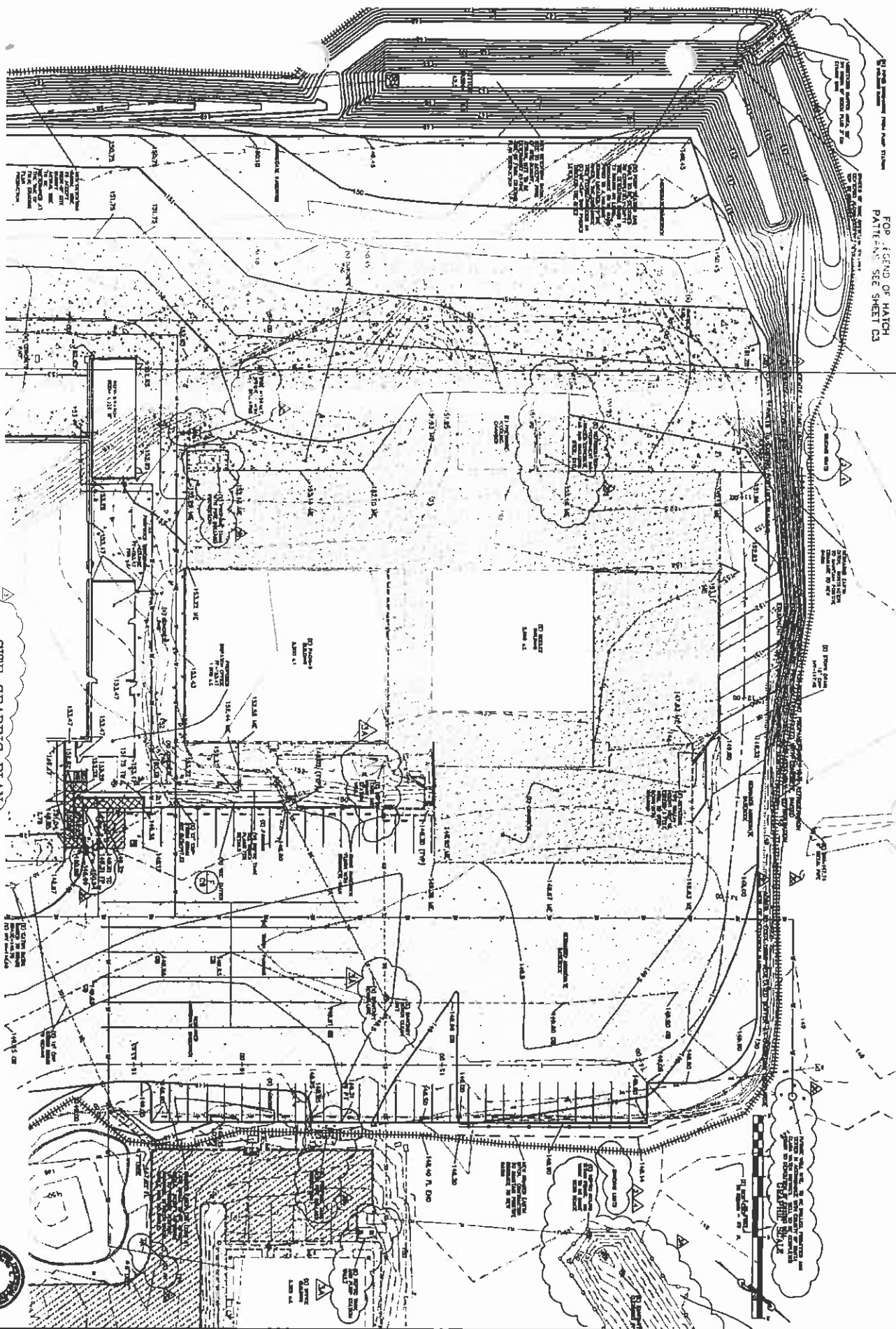
- △ EXISTING CHANNEL LIMIT
- △ EXISTING EXPOSED STRUCTURE, FILL, TANKS AND UTILITY STRUCT.
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FOR (END OF MATCH)
PATIENT: SEE SHEET C3



△ SITE GRADING PLAN
SCALE: 1" = 30'

PRELIMINARY GRADING PLANS

