EXECUTIVE SUMMARY

ES.1 PROJECT BACKGROUND

On July 5, 2017, a Second Reading of Ordinance No. 1177 (by title only, Amending Title 17 [Zoning], Chapter 17.11, Article X of the Calexico Municipal Code Regulating Commercial Cannabis Activity) and Ordinance 1178, (by title only, Amending Title 5 [Business Licenses and Regulations [Article II, Chapter 5.96 of the Calexico Municipal Code Regulating Commercial Cannabis Activity) took place. On this same date, the City Council also adopted both ordinances creating a new Chapter under Title 5, Business Licenses and Regulations, establishing a regulatory permit scheme for cannabis cultivation, manufacturing, distribution, testing, and transportation activities, such that each proposed commercial cannabis activity must have both a conditional use permit, development agreement or other applicable entitlements and a regulatory permit prior to operation.

In response to the City's recent actions that allow for cultivation, manufacturing, distribution, testing, and transportation of cannabis, the City has begun receiving applications to develop such uses. On October 30, 2017, five Uniform Application packages were submitted to the City of Calexico by Applicants Barrington Consulting, LLC; Calexico Distribution Company, LLC; Cole Boulevard Advisors, LLC; Desert Valley Partners, LLC; and Trinity 341, LLC. The applications propose construction of three and operation of four cannabis cultivation and manufacturing facilities and one transportation and distribution facility (collectively "Trinity Cannabis Cultivation and Manufacturing Facility") located in within the Cannabis Overlay Zone (COZ) in Calexico, California. A summary of application by Applicant is provided below.

- **Trinity 341, LLC.** A Uniform Application and Development Agreement requesting a Lot Line Adjustment and Parcel Carve-out. The Applicant is also requesting a Cultivation and a Manufacturing License, Commercial Cannabis Activity Regulatory Permit Application, Environmental Information Application, Site Plan Review, and all necessary Building Permits. In addition, the Applicant would need a License from the Bureau of Cannabis Control, a CalCannabis Cultivation License, a Manufacturing License from the Manufactured Cannabis Safety Branch, and a Business License from the City of Calexico.
- **Barrington Consulting, LLC.** A Uniform Application and Development Agreement requesting a Lot Merger. The Applicant is also requesting a Cultivation and a Manufacturing, License Commercial Cannabis Activity Regulatory Permit Application, Environmental Information Application, Site Plan Review, and all necessary Building Permits. In addition, the Applicant would need a License from the Bureau of Cannabis Control, a CalCannabis Cultivation License, and a Manufacturing License from the Manufactured Cannabis Safety Branch and a Business License from the City of Calexico.
- **Calexico Distribution Company, LLC.** *A* Uniform Application and Development Agreement requesting a Lot Line Adjustment. The Applicant is also requesting a Distribution License, Commercial Cannabis Activity Regulatory Permit Application, Environmental Information Application, Site Plan Review, and all necessary Building Permits. In addition, the Applicant would need a Distribution License from the Bureau of Cannabis Control, and a Business License from the City of Calexico.
- **Cole Boulevard Advisors, LLC.** A Uniform Application and Development Agreement requesting a Lot Line Adjustment. The Applicant is also requesting a Cultivation and a Manufacturing License, Commercial Cannabis Activity Regulatory Permit Application, Environmental Information Application, Site Plan Review, and all necessary Building Permits. In addition, the Applicant would need a License from the Bureau of Cannabis Control, a CalCannabis Cultivation License, a Manufacturing License from the Manufactured Cannabis Safety Branch, and a Business License from the City of Calexico.
- **Desert Valley Partners, LLC.** A Uniform Application and Development Agreement requesting a Lot Line Adjustment. The Applicant is also requesting a Cultivation and a Manufacturing License, Commercial Cannabis Activity Regulatory Permit Application, Environmental Information Application,

Site Plan Review, and all necessary Building Permits. In addition, the Applicant would need a License from the Bureau of Cannabis Control, a CalCannabis Cultivation License, a Manufacturing License from the Manufactured Cannabis Safety Branch, and a Business License from the City of Calexico. This EIR is being prepared to analyze the potential environmental impacts of the proposed Project and fulfill the requirements of CEQA. The focus of this EIR is on the construction and operation of the Trinity Cannabis Cultivation and Manufacturing Facility.

A Notice of Preparation (NOP) for the Trinity Cannabis Cultivation and Manufacturing Facility Draft EIR was issued by the City of Calexico on December 13, 2017. The NOP is included in **Appendix A** of this EIR.

ES.2 PROJECT OVERVIEW

The Project includes two Phases. Phase 1 consists of one existing building at 2421 Enterprise Boulevard that will undergo tenant improvements to accommodate cultivation and manufacturing. Phase 1 also includes a transportation and distribution facility with a transportation office located on a parcel carve-out north of the existing building at 2421 Enterprise Boulevard. This parcel will also have a guard shack and administration office. Phase 2 consists of three additional cultivation and manufacturing buildings proposed to be constructed on vacant land located along Sunset Boulevard.

On October 30, 2017, five separate Applicants submitted five Uniform Applications to the City of Calexico Planning Department as part of the Trinity Cannabis Cultivation and Manufacturing Facility ("Project"). The proposed Project includes the construction and operation of the following by each Applicant.

- Trinity 341, LLC. Tenant improvements to an existing 33,112 square-foot (sq. ft.) building on 2.21 acres at 2421 Enterprise Boulevard on assessor's parcel number (APN) 059-343-018. The facility will be used to cultivate and manufacture cannabis.
- Barrington Consulting, LLC. Construction of a 38,500 sq. ft. building with a ground-floor and mezzanine on 2.00 acres located on APN 059-343-003 and 059-343-014. The facility will be used to cultivate and manufacture cannabis.
- Cole Boulevard Advisors, LLC. Construction of a 48,300 sq. ft. building on 2.00 acres located on APN 059-343-006. The facility will be used to cultivate and manufacture cannabis.
- Desert Valley Partners, LLC, construction of a 43,750 sq. ft. building on 2.00 acres located on APN 059-343-016. The facility will be used to cultivate and manufacture cannabis.
- Calexico Distribution Company, LLC. A 10,000 sq. ft. (0.23 acre) parcel carved out of APN 059-343-018. The facility will be used for transport and distribution of cannabis.

ES.3 PROPOSED PROJECT

The proposed Trinity Cannabis Cultivation and Manufacturing Facility would be constructed in two phases over a period of 30 months. Construction would start with Phase 1 tenant improvements on the existing 33,112 sq. ft. structure at 2421 Enterprise Boulevard, carve-out of a transportation and distribution facility parcel and a 1,056 sq. ft. transportation office. Phase 2 would include three buildings totaling 130,550 sq. ft. of cultivation and manufacturing as well as a 2,200 sq. ft. administration building and a 323 sq. ft. guard house. In total, the Project would occupy 8.44 acres with 167,241 sq. ft. and have 263 parking spaces. Each of the two phases of the proposed Project is depicted in **Figure 2.0-4** and described in detail below.

PHASE 1

Building A, 2421 Enterprise Boulevard - Trinity 341, LLC

The existing 33,112 sq. ft. building is located on a single parcel (APN 05-343-018) approximately two acres in size fronting on Enterprise Boulevard to the east (**Figure 2.0-5A**). The Applicant proposes tenant

improvements to accommodate cannabis cultivation and manufacturing within the existing structure. The site would include 53 parking spaces as well as a 2,200 sq. ft. administration building and a 323 sq. ft. guard shack. The application requests a Lot Line Adjustment and Parcel Carve-out to create a new parcel for the Transportation and Distribution Facility immediately to the north of 2421 Enterprise Boulevard. Demolition of interior is anticipated to occur around April 15, 2018. Tenant Improvements will begin within two weeks of the receipt of a Building Permit and take approximately five months. The improvements are anticipated to be completed in 2018.

Transportation and Distribution Facility – Calexico Distribution Company, LLC

The Transportation and Distribution Facility is a proposed on 0.23 acres to be carved out from APN 059-343-018. A new APN would be created for the Transportation and Distribution Facility which is proposed immediately north of 2421 Enterprise Boulevard and fronts on Enterprise Boulevard to the east. The Facility would be surrounded by an 8-foot tall steel fence and 8-foot tall concrete masonry unit fence and a 1,056 sq. ft. transportation office. The site would include 15 parking spaces. The action proposed by the application is to be determined upon approval of the parcel map. The Transportation and Distribution Facility would be constructed concurrent with the tenant improvements at 2421 Enterprise Boulevard.

PHASE 2

Building B, Parcel 1 - Barrington Consulting, LLC

Building B is a 38,500-sq. ft. structure proposed on two parcels (APNs 059-343-003 and 059-343-014) totaling 2.21 acres. The parcel fronts on Sunset Boulevard to the west. Building B includes a 29,000 square foot ground-floor and 9,500 sq. ft. mezzanine. The site would include 76 parking spaces. The application requests a Lot Merger for the two parcels to create Parcel 1. Construction of Building B is anticipated to begin in the fourth quarter of 2018 with completion by September 2019.

Building C, Parcel 2 – Cole Boulevard Advisors, LLC

Building C is a 48,300-square-foot structure proposed on a single parcel (APN 059-343-006) totaling 2.0 acres. The parcel fronts on Sunset Boulevard to the west. Building C includes a ground-floor and mezzanine. The site would include 57 parking spaces. The application requests a Lot Line Adjustment. Construction of Building C is projected to begin in the fourth quarter of 2018 with completion estimated by September 2019.

Building D, Parcel 3 – Desert Valley Partners, LLC

Building D is a 43,750-square-foot structure proposed on a single parcel (APN 059-343-016) totaling 2.0 acres. The parcel fronts on Sunset Boulevard to the west. Building B includes a ground-floor and mezzanine. The site would include 62 parking spaces. The application requests a Lot Line Adjustment. Construction of Building D is projected to begin around February 2020 with targeted completion of October 2020.

ES.4 PURPOSE AND NEED

The underlying purpose of the proposed Project is to construct and operate a cannabis cultivation and manufacturing facility and transportation and distribution facility that will help meet the increasing demand for medical cannabis and provide economic investment and diversification of the economic base in the City of Calexico.

Section 15124 of the CEQA Guidelines requires that the EIR include a statement of objectives sought by the proposed project. These objectives identify the overall purpose of the project and provide a basis for identification of alternatives evaluated in the EIR. A clearly written statement of objectives allows the lead

agency to develop a reasonable range of alternatives to evaluate in the EIR and aids the decision-makers in preparing findings or a statement of overriding considerations, if necessary.

ES.5 OBJECTIVES

The proposed Trinity Cannabis Cultivation and Manufacturing Facility has the following objectives:

1. To set the standard for cannabis cultivators.
2. To be responsible civic and corporate citizens.
3. To bring a sustainable and expandable model of commerce to Calexico.
4. To diversify Calexico's economic and industrial base.
5. To bring economic growth to Calexico including employment, taxes and associated multiplier effect.
6. To provide a legal holistic option to patients and ultimately consumers as an alternative to opioids and the Black Market.
7. To cultivate and manufacture pesticide free, top-tier cannabis and cannabis products from an environmentally conscious, state-of-the art, sophisticated, agri-business campus.

ES.6 ALTERNATIVES

This EIR considered three alternatives in addition to the proposed Project:

ALTERNATIVE 1 – 2421 ENTERPRISE BOULEVARD WITH TRANSPORTATION AND DISTRIBUTION FACILITY

Under Alternative 1, the existing 33,112 square foot building at 2421 Enterprise Boulevard would be developed with a cannabis cultivation and manufacturing facility identical to the proposed Project. This Alternative also includes a Lot Line Adjustment and Parcel Carve-out to create a new 0.23-acre parcel for the Transportation and Distribution Facility immediately to the north of 2421 Enterprise Boulevard. The A 1,056-sq. ft. Transportation Office would be located on the western portion of the 10,000 sq. ft. parcel and enable distribution of product. No other buildings would be developed as part of Alternative 1. Sufficient electricity would be available to serve Alternative 1 from IID's existing power supply and a new substation a would not be required.

6.3.2 ALTERNATIVE 2 – ALUMINUM REACTORS ENERGY ALTERNATIVE

Under Alternative 2, electricity to support Phase 2 energy demand would be provided solely on-site with aluminum reactors and be independent of the IID. Eight aluminum reactors will be housed on one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise to supply electricity for Phase 2 (Buildings B, C and D) (**Figure 6.0-1**). This alternative would use a patented carbon-neutral energy generation process in which aluminum reactors convert scrap aluminum (e.g., chaff) into hydrogen gas that drives micro-turbine generators to produce electrical power. The aluminum feedstock will be sourced from Alluminati and Cavendish partners, fully prepared for use. Additionally, the process produces small amounts of water that can be processed and subsequently used in cultivation as well as generating a by-product that can be sold for application in wastewater treatment, paper-making, cement acceleration, aluminum production, fire retardant, fillers and pigments.

Logistically a small space will be required for feedstock storage, essentially an area of lined cinderblock much like a rock or sand vendor. Cavendish will provide the aluminum input resources as well as ferry away the processed byproduct with, in general, both respectively sourced and sold locally or in the same state via a Services Agreement between Cavendish and Trinity. Aluminum delivery and byproduct removal will typically be done on the same trip. Only one or two trips per month may be required of the

feedstock vendor to reload scrap feedstock and remove by-products of the energy generation process. Aluminum delivery and byproduct removal will typically be done on the same trip. Byproduct will be put into direct use in multiple industries including Federal Government facilities and/or Defense Contractors.

6.3.3 ALTERNATIVE 3 – ON-SITE SOLAR POWER ALTERNATIVE

Under Alternative 3, electricity to supplement IID electricity and support Phase 2 energy demand would be provided by development of on-site solar facilities. Electrical load available to the Project is limited by the Imperial Irrigation District's ("IID") need to maintain significant excess capacity on the existing substation circuit. Excess capacity is required in order to provide sufficient electrical energy during infrequent and relatively brief spikes in energy usage, typically on record-breaking hot days during the summer months. The vast majority of the time there is sufficient latent capacity within the existing infrastructure to provide the 9.63 MW required by Phase 2 (Buildings B, C and D) of the Project. By using a combination of solar panels and advanced energy storage technology (i.e. a battery energy storage system) the Project could provide both on-site electrical generation as well as access the excess capacity resident in the existing infrastructure, negating the need to augment the IID electrical infrastructure (e.g., build a new substation).

Under this Alternative, the Project or facilities will self-generate approximately 1.5 MW or sixteen percent (16%) of its total steady-state electrical usage needs by employing rooftop mounted solar panel installations on each building and future carport (**Figure 6.0-2**). The carports will be designed to utilize the proposed parking areas adjacent to Buildings A, B, C and D. In addition, the Project is proposing to install a power configuration energy storage system (e.g., Tesla batteries) that will be sited adjacent to the emergency generator for Building D. The energy storage system will consist of two 7-foot by 12-foot self-contained cabinets that will be designed to be connected to the facilities' electrical infrastructure and synchronized to the IID, the electric utility, "behind the meter" (i.e., connect between IID and the facility tie-in point). The power generated under non-peak circumstances supplies energy directly to the facility rather than accessing power from, or selling power to, the IID's electrical grid. The Project's energy storage system can generate sufficient short-term electricity that will be used to off-set demand peaks in IID's system during spikes in energy usage.

ALTERNATIVE 4 – NO PROJECT ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(1) requires that a No Project Alternative be analyzed in order to allow the decision-makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. Under the No Project Alternative, the proposed Trinity Cannabis Cultivation and Manufacturing Facility would not be developed. No Uniform Application or Developer Agreement would be approved for any of the five applications. The Project parcels could remain in its existing condition as vacant land and an existing building at 2421 Enterprise Boulevard. Under this alternative, the Applicants would sell the vacant land and likely the building. The No Project Alternative would not develop the site with the proposed Cannabis Cultivation and Manufacturing Facility thereby foregoing creation of approximately 78 potential jobs and more than $1,000,000 per year in anticipated tax revenue to the City of Calexico projected to be generated by the Project at full buildout and operation.

ES.7 SUMMARY OF IMPACTS

Table ES-1 summarizes the environmental impacts resulting from the proposed project pursuant to CEQA Guidelines Section 15123(b)(1).

TABLE ES-1
SUMMARY OF IMPACTS

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
LAND USE			
Conflict With Any Applicable Land Use Plan, Policy, or Regulation **Impact 4.1.1** The proposed Project is consistent with the General Plan land use designation of Industrial, existing zoning of Industrial and Commercial Highway, and is within the COZ overlay zone. The Project parcels are not within any compatibility zones of the Calexico International Airport. Therefore, conflicts with applicable land use plans, policies and regulations are considered a **less than significant impact**.	LTS	None required.	LTS

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Cumulative Conflicts with Applicable Land Use Plans, Policies, or Regulations **Impact 4.1.2** Development of the proposed Project in combination with proposed, approved and reasonably foreseeable projects in the City would not incrementally add to conflicts with applicable land use plans, policies and regulations. Each project would be required to be consistent with the applicable plans that apply to the area in which it is located. Thus, cumulative conflicts with applicable land use plans, policies, or regulations is considered **less than cumulatively considerable.**	LCC	None required.	LCC

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AIR QUALITY			
Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard **Impact 4.2.1** Implementation of the proposed Project would increase air pollutant emissions during Project construction and operation. No criteria pollutant thresholds were calculated to be exceeded during either Project construction or operations. However, both construction and operational emissions could contribute to localized pollutant concentrations that could conflict with or obstruct the implementation of applicable air quality plans and exceed applicable air quality standards. This is considered a **potentially significant impact**.	PS	**MM 4.2.1a** The following mitigation measures shall be implemented to reduce short-term construction emissions: a. All disturbed areas, including bulk material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps or other suitable material such as vegetative ground cover. b. All on site and off site unpaved roads will be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. c. All unpaved traffic areas one (1) acre or more with 75 or more average vehicle trips per day will be effectively stabilized and visible emission shall be limited to no greater than 20% opacity for dust emissions by paving, chemical stabilizers, dust suppressants and/or watering. d. The transport of bulk materials shall be completely covered unless six inches of freeboard space from	LTS

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Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard **Impact 4.2.1** Implementation of the proposed Project would increase air pollutant emissions during Project construction and operation. No criteria pollutant thresholds were calculated to be exceeded during either Project construction or operations. However, both construction and operational emissions could contribute to localized pollutant concentrations that could conflict with or obstruct the implementation of applicable air quality plans and exceed applicable air quality standards. This is considered a **potentially significant impact**.	PS	the top of the container is maintained with no spillage and loss of Bulk Material. In addition, the cargo compartment of all Haul Trucks is to be cleaned and/or washed at delivery site after removal of Bulk Material. e. All Track-Out or Carry-Out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an Urban area. f. Movement of Bulk Material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers or by sheltering or enclosing the operation and transfer line. g. The construction of any new Unpaved Road is prohibited within any area with a population of 500 or more unless the road meets the definition of a Temporary Unpaved Road. Any temporary unpaved road shall be effectively stabilized and visible emissions shall be limited to no greater than 20% opacity for dust emission by paving, chemical stabilizers, dust suppressants and/or watering. h. Water exposed soil with adequate frequency for	LTS

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Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard **Impact 4.2.1** Implementation of the proposed Project would increase air pollutant emissions during Project construction and operation. No criteria pollutant thresholds were calculated to be exceeded during either Project construction or operations. However, both construction and operational emissions could contribute to localized pollutant concentrations that could conflict with or obstruct the implementation of applicable air quality plans and exceed applicable air quality standards. This is considered a **potentially significant impact**.	PS	continued moist soil. i. Replace ground cover in disturbed areas as quickly as possible j. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site. j. Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment, to the extent available locally. k. Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes as a maximum. l. Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use m. To the extent locally available, use newer heavy-duty construction equipment meeting, at a minimum, U.S. EPA Tier 3 emission standards. n. Replace fossil fueled equipment with electrically driven equivalents to the extent available locally (provided they are not run via a portable generator set)	LTS

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Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard **Impact 4.2.1** Implementation of the proposed Project would increase air pollutant emissions during Project construction and operation. No criteria pollutant thresholds were calculated to be exceeded during either Project construction or operations. However, both construction and operational emissions could contribute to localized pollutant concentrations that could conflict with or obstruct the implementation of applicable air quality plans and exceed applicable air quality standards. This is considered a **potentially significant impact**.	PS	**MM 4.2.1b** The following mitigation measures shall be implemented to reduce long-term operational emissions: a. Provide on-site bicycle lockers and/or racks; b. Provide on-site heating, refrigeration and food vending facilities to reduce lunchtime trips; c. Provide shower and locker facilities to encourage employees to bike and/or walk to work; d. Provide for paving a minimum of 100 feet from the property line for commercial driveways that access County paved roads as per County Standard Commercial Driveway Detail 410B (formerly SW-131A). e. Incorporate measures which meet mandatory, prescriptive and/or performance measures as required by Title 24. f. The use of volatile solvents for the manufacturing of cannabis shall be prohibited.	LTS
Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant **Impact 4.2.2** Implementation of the proposed Project would generate operational emissions that could contribute, on a cumulative basis, to localized and/or regional air quality impacts. This is considered a **potentially significant impact**.	PS	Implement mitigation measures MM 4.2.1a and MM 4.2.1b.	LTS

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Expose Sensitive Receptors to Substantial Pollutant Concentrations **Impact 4.2.3** Implementation of the proposed Project could expose construction workers and nearby land uses to emissions and dust. Exposure to sensitive receptors to substantial pollutant concentrations is considered a **potentially significant impact.**	PS	Implementation of mitigation measure MM 4.2.1a would require implementation of measures for the control of construction-generated emissions. These measures would result in a substantial reduction of construction-generated emissions from off-road equipment, including DPM, as well as, reduction in fugitive dust emitted by ground-disturbing activities. The control of emissions from ground-disturbing activities would also reduce potential for exposure to Valley Fever spores.	LTS
Create Objectionable Odors Affecting a Substantial Number of People **Impact 4.2.4** Construction of the proposed Project would generate short-term odors in association with diesel exhaust and long-term odors from cultivation and manufacturing operations. Construction odors would dissipate rapidly and an exhaust system would dilute and disburse operational odors. Therefore, impacts resulting from objectional odors affecting a substantial number of people are considered **less than significant**.	LTS	None required.	LTS

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Violate Air Quality Standard/Cause Air Quality Violation **Impact 4.2.5** The proposed Project would generate criteria pollutant emissions during construction. However, the short-term construction emissions exceedances of ICAPCD thresholds would be mitigated with implementation of mitigation measures. Project generated operational emissions could contribute, on a cumulative basis, to localized and/or regional air quality impacts. Therefore, the proposed Project's contribution to violating an air quality standard is considered **cumulatively considerable**.	CC	Implementation of mitigation measure MM 4.2.1a would reduce construction NOx and PM_{10} emissions to less than significant levels on a project-specific basis. Likewise, although ICAPCD thresholds would not be exceeded on an operational basis, mitigation measure MM 4.2.1b is identified to further reduce long-term operational emissions which could contribute to cumulative localized and/or regional air quality impacts	LCC
BIOLOGICAL RESOURCES			
Impacts to Candidate, Sensitive, or Special Status Species **Impact 4.3.1** Construction of the proposed Project would result in the removal of disturbed habitat as well as a Big Saltbush scrub. None of the existing land cover types on the Project parcels are considered special status habitats nor are any special status plants of wildlife present. Therefore, impacts to a candidate, sensitive, or special status species are considered **less than significant**.	LTS	None required.	LTS

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Impacts to Nesting and Migratory Birds **Impact 4.3.2** The proposed Project could result in direct impacts to nesting and migratory birds protected under CDFG Code and the MBTA. This is considered a **potentially significant impact.**	PS	**MM 4.3.2a** Vegetation removal should occur outside the migratory bird breeding and raptor breeding season (January 15 – September 15). Alternatively, pre-construction surveys for the presence of nesting raptors or other birds will be required to ensure that active nests are not removed. **MM 4.3.2b** If construction or other Project activities are scheduled to occur during the bird breeding season (January 15 – September 15), a pre-construction nesting bird survey shall be conducted by a qualified biologist. The focus of the survey will be detecting nesting activities of bird and raptor species on the Project parcels. The survey shall be completed no more than 3 days prior to grading activities. The nesting bird survey shall include the Project parcels and adjacent areas where construction activities have the potential to cause nest failure. If an active nest is identified, a qualified biologist shall establish an appropriate disturbance limit buffer around the nest using flagging or staking. Construction activities shall avoid disturbance within the buffer zones until the nest is deemed no longer active by the biologist.	LTS

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Cumulative Impacts to Biological Resources (Candidate, Sensitive, or Special Status Species and Nesting and Migratory Birds) **Impact 4.3.3** Implementation of the proposed Project in combination with other proposed, approved and reasonably foreseeable projects in the City of Calexico, could have cumulative impacts on candidate, sensitive, or special status species and nesting and migratory birds. Biological surveys and mitigation measures are required on a project-specific basis to address impacts to biological resources including habitats and wildlife. Therefore, cumulative impacts to candidate, sensitive, or special status species and nesting and migratory birds are considered **less than cumulatively considerable**.	LCC	Implement MM 4.3.2a and MM 4.3.2b.	LCC
CULTURAL AND PALEONTOLOGICAL RESOURCES			
Impacts to Historical Resources **Impact 4.4.1** Six historic resources were identified as part of the records search conducted for the Project parcels. None of the resources were identified on the proposed Project parcels. Therefore, **no impact** to a historic resource would occur as a result of development of the proposed Project.	NI	None.	NI

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Impacts to Unknown Subsurface Archaeological Resources **Impact 4.4.2** Unrecorded subsurface archaeological resources if present within the boundaries of the Project parcels could be damaged during earth-moving activities. This is considered a **potentially significant impact**.	PS	**MM 4.4.2** Due to the extensive disturbance by past farming and the limited depth of disturbance for the proposed Project, archaeological monitoring is not required on the Project parcels. If subsurface resources are discovered by construction workers, a Registered Professional Archeologist (RPA) shall be called to the site to investigate and monitor subsurface excavations within 100 feet of the potential resource. Monitoring activities shall be supervised by an RPA who shall have the authority to determine the duration, intensity and inspection timing (from full-time to as-needed). The RPA shall be empowered to temporarily halt or divert construction operations within a reasonable distance from a find or resource exposure in order to determine if significant archaeological resources are present, and if such resource would be adversely affected by continuing construction operations. Per CEQA Guidelines Section 15126.4(b)(3)(A), preservation in place is the preferred method of mitigating impacts to archaeological sites. The RPA shall immediately notify the City of Calexico Planning Department of such discoveries/decisions. Work shall not continue at the discovery site until	LTS

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Impacts to Unknown Subsurface Archaeological Resources **Impact 4.4.2** Unrecorded subsurface archaeological resources if present within the boundaries of the Project parcels could be damaged during earth-moving activities. This is considered a **potentially significant impact**.	PS	the RPA, in coordination with City of Calexico Planning Department, conducts sufficient research and data collection to make a determination that the resource is either not cultural in origin; or not potentially significant or eligible for listing on the NRHP or CRHR. If a potentially-eligible resource is encountered, then the RPA, lead agency, and Project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations to evaluate eligibility for the CRHR and, if eligible, data recovery as mitigation. The data recovery plan shall identify methods for recovering the scientifically consequential information from and about the historical resource, and recordation/deposition of data/materials with the local California Historical Resources Information Center (CHRIS). Any recovered artifacts would be curated with a local museum. This will enable the collection of information that may be important to the prehistory or history of the local area, California, or the nation.	LTS

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Impacts to Nonrenewable Fossil (Paleontological) Remains **Impact 4.4.3** Fossil remains if present beneath the Project parcels could be destroyed by excavation and other earth-moving activities. This is considered a **potentially significant impact**.	PS	**MM 4.4.3** Earth-moving operations impacting the soils five feet and deeper within the Project parcels shall be "spot-checked" up to two days per week by a RPA to determine whether undisturbed lakebed sediments have been encountered. If within that period no paleontological findings are discovered, no further monitoring will be required. If paleontologically sensitive soils are being impacted, the RPA would have discretion to increase monitoring to full-time within a radius of 100 meters of the find. Paleontological monitors shall be equipped to salvage fossils as they are unearthed (to help avoid construction delays) and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. Monitors shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens. Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Fossil specimens shall be curated by accessioning into an	LTS

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Impacts to Nonrenewable Fossil (Paleontological) Remains **Impact 4.4.3** Fossil remains if present beneath the Project parcels could be destroyed by excavation and other earth-moving activities. This is considered a **potentially significant impact**.	PS	established, accredited museum repository with permanent retrievable paleontological storage. A report of findings with an appended itemized inventory of specimens shall be prepared. Submittal of the report and inventory to the City of Calexico Planning Department along with confirmation of the curation of recovered specimens into an established, accredited museum repository, shall signify completion of the program to mitigate impacts to paleontological resources.	LTS

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Impacts to Subsurface Human Remains **Impact 4.4.4** It is unknown whether there are human remains buried within the boundaries of the Project parcels that could be discovered during construction. Therefore, impacts to subsurface human remains are considered a **potentially significant impact**.	PS	**MM 4.4.4** In the event that evidence of human remains is discovered, construction activities within 200 feet of the discovery shall be halted or diverted and the City of Calexico Planning Department and the Imperial County Coroner shall be notified (Section 7050.5 of the Health and Safety Code). If the Coroner determines that the remains are Native American, the Coroner will notify the NAHC which will designate a Most Likely Descendant (MLD) for the Project (Section 5097.98 of the Public Resources Code). The designated MLD then has 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the Public Resources Code). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB 2641).	LTS

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Cumulative Impacts to Historical, Archaeological and Paleontological Resources and Human Remains **Impact 4.4.5** Implementation of the proposed Project, in combination with proposed, approved and reasonably foreseeable projects in the City of Calexico, has the potential to result in impacts to historical, archaeological and paleontological resources and human remains. However, impacts to these resources are addressed on a project-by-project basis. Therefore, a **less than cumulatively considerable impact** would occur with regard to historical, archaeological and paleontological resources and human remains.	LCC	Implement mitigation measures MM 4.4.2, MM 4.3.4 and MM 4.4.4.	LCC
GEOLOGY AND SOILS			
Strong Seismic Ground Shaking **Impact 4.5.1** The Project parcels have the potential to be exposed to strong ground shaking during an earthquake along several faults. This is considered a **potentially significant impact.**	PS	**MM 4.5.1** Project structures shall be designed and constructed in accordance with the 2016 California Building Code (CBC) for Soil Site Class D (stiff soil profile), ASCE 7-10 Seismic Parameters, and CBC as appropriate. .	LTS

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Liquefaction/Seismic Settlement **Impact 4.5.2** Silty clays and clay are the predominant soils on the Project parcels. Liquefaction is a potential design consideration because of possible saturated sandy substrata underlying the Project parcels which could result in seismic settlement. Therefore, liquefaction and seismic settlement are considered a **potentially significant impact**.	PS	Refer to mitigation measure MM 4.5.1	LTS
Erosion **Impact 4.5.3** Surface soils on the Project parcels are generally classified as silty clay and clay. The hazard of erosion on these soils is considered low. Therefore, erosion of site soils is considered a **less than significant impact.**	LTS	None required.	LTS

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Expansive Soils **Impact 4.5.4** The near surface soils in the Project parcels are silty clays and clays. These soils have a moderate to high expansion potential. Therefore, expansive soils present a **potentially significant impact.**	PS	**MM 4.5.4** A site specific geotechnical investigation shall be prepared for the Project parcels to determine the extent and effect of expansive soils. The proposed buildings shall be designed in accordance with the recommendations of the geotechnical investigation addressing expansive soils.	
Soil Corrosivity **Impact 4.5.5** Soils within the which are known to be corrosive. This is considered Project parcels consist of lakebed deposits a **potentially significant impact.**	PS	**MM 4.5.5** To protect against corrosive soils, high cement contents (6 sacks Type V Portland cement) shall be mixed with low water-cement ratios (0.45 water to cement ratio). Additionally, steel post corrosion protection shall be required for metal features that come in contact with soil. The protection shall consist of zinc coatings (galvanizing) or increasing structural sections to compensate for metal loss due to corrosion.	LTS

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Cumulative Geology and Soils Impacts **Impact 4.5.6** Development of the proposed Project, in conjunction with proposed, approved and reasonably foreseeable projects within the City of Calexico would result in continued urbanization of the area by increasing the density of development and exposing more people and structures to geologic and seismic impacts. These impacts are reduced on a project-specific basis through design and engineering. Therefore, cumulative geology and soils impacts are considered **less than cumulatively considerable**.	LCC	Implement mitigation measures MM 4.5.1, MM 4.5.4 and MM 4.5.5.	LCC

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CLIMATE CHANGE AND GREENHOUSE GASES			
Generation of GHG Emissions/Conflict with Applicable Plan, Policy or Regulation Reducing GHGs **Impact 4.6.1** Implementation of the proposed Project would produce both short-term construction and long-term operational GHGs**.** Operational GHG emissions would exceed the threshold of 900 $MTCO_2e$/year. Generation of GHGs in excess of the threshold could conflict with GHG-reduction planning efforts. This is considered a **potentially significant impact.**	PS	Implement mitigation measure MM 4.2.1a j thru n and MM 4.2.1b. **MM 4.6.1a** Incorporate water-reducing features into building and landscape design exceeding current building standards. Such measures shall include, at a minimum, the following: • Installation of xeriscape landscaping. • Installation of automated water-efficient irrigation systems and building fixtures. **MM 4.6.1b** Incorporate energy-reducing features into building and site design exceeding current building standards. Such measures shall include, at a minimum, the use of high-efficiency HVAC & dehumidification systems. **MM 4.6.1c** Incorporate energy-reducing practices to minimize peak energy loads. Such measures may include the staggering of grow room schedules over a 24-hour period so the minimum number of rooms run concurrently. Similarly, other energy-intensive processes such as extraction, cleaning or electric heating should be staggered and scheduled carefully with lighting cycles to minimize peak power demands. Scheduling overlapping or	SU

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Generation of GHG Emissions/Conflict with Applicable Plan, Policy or Regulation Reducing GHGs **Impact 4.6.1** Implementation of the proposed Project would produce both short-term construction and long-term operational GHGs**.** Operational GHG emissions would exceed the threshold of 900 $MTCO_2e$/year. Generation of GHGs in excess of the threshold could conflict with GHG-reduction planning efforts. This is considered a **potentially significant impact.**	PS	high-energy demand activities during the nighttime when outdoor air temperatures are lower can reduce the cooling load during peak energy demand time. **MM 4.6.1d** Incorporate the use of alternative/renewable energy sources (e.g., solar photovoltaic, wind-power systems) to the maximum extent achievable through site and building design. **MM 4.6.1e** Light colored "cool" roofs and cool pavements shall be included in building and site designs to the extent practical. **MM 4.6.1f** To the extent practical, on-site plant waste shall be diverted for composting or recycling. Recycling of other materials (e.g., paper, plastic, glass, etc.) shall comply with current regulatory requirements.	SU

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HAZARDS AND HAZARDOUS MATERIALS			
Hazardous Materials Transport, Use, Disposal and Accidental Release **Impact 4.7.1** The proposed Project does not involve the use of large quantities of hazardous materials during construction or operation. However, each of the four cultivation and manufacturing facilities would be equipped with a diesel generator that would require occasional refueling which presents the possibility of leaks and spills. This is considered a **potentially significant impact**.	PS	**MM 4.7.1** To reduce and avoid the potential for leaks from the diesel fuel tanks and spills during the re-fueling process at each cultivation and manufacturing facility, the City of Calexico Planning Department shall require one or more of the following measures: • Install a 5-gallon spill/fill catch basin • Install a high-level fill switch • Install an alarm for Hi, Low, Leak, Full Fuel • Install an overfill protection valve • Install a fuel supply check valve *Timing/Implementation: As a condition of Project approval/during construction* *Enforcement/Monitoring: City of Calexico Planning Department.*	LTS

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Create a Hazard Through Reasonably Foreseeable Upset/Release of Hazardous Materials **Impact 4.7.2** The Project parcels were historically used as agricultural land but are currently vacant land and an existing building at 2421 Enterprise Boulevard. No evidence of recognized environmental conditions of any kind was identified as part of the Phase I ESAs prepared for the Project. Therefore, the potential for the Project parcels to create a hazard through reasonably foreseeable upset or release of hazardous materials is considered a **less than significant impact**.	LTS	None required.	LTS

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Emit Hazardous Emissions within One-Quarter Mile of a School **Impact 4.7.3** The proposed Trinity Cannabis Cultivation and Manufacturing Facility is located slightly less than one-quarter mile from the Small World Montessori School. The proposed use is allowable within the COZ and is more than 600 feet away from the School consistent with the requirements of the Calexico Municipal Code regarding commercial cannabis activity. In addition, the Project include engineering control systems to eliminate emissions. Therefore, impacts associated with emitting hazards within one-quarter mile of a school are considered **less than significant**.	LTS	None required.	LTS
Cumulative Hazards and Hazardous Materials Impact **Impact 4.7.4** The proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in the City of Calexico, would increase the density of development in the Portico Industrial Park, thus potentially increasing the potential for the presence hazards and use of hazardous materials. However, this is considered to be a **less than cumulatively considerable impact**.	LCC	Implement mitigation measure MM 4.7.1.	LCC

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HYDROLOGY AND WATER QUALITY			
Violate Water Quality Standards or Waste Discharge Requirements **Impact 4.8.1** Implementation of the proposed Project would increase runoff during construction as well as during operation through the introduction of buildings and impervious surfaces. Pollutants would be introduced to the site that could be transported offsite in stormwater runoff. Therefore, the Project's potential to violate water quality standards or waste discharge requirements is considered a **potentially significant impact**.	PS	**MM 4.8.1a** The Project shall be designed and constructed in compliance with the NPDES permit and all applicable State and local water quality requirements prior to the commencement of construction. **MM 4.8.1b** A Storm Water Pollution Prevention Plan (SWPPP) shall be developed and implemented for the Project parcels. The SWPPP shall identity pollutant sources that may affect storm water quality discharges during construction. The SWPPP shall include various pollution prevention measures such as erosion and dust control. The SWPPP shall also include a comprehensive Best Management Practices (BMPs) Guide for contractors during construction. **MM 4.8.1c** The Applicant of each cultivation and manufacturing facility and the Applicant responsible for the Transportation and Distribution Facility shall comply with the local Standard Stormwater Mitigation Plan (SSMP) for parking lots and commercial development.	LTS

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Violate Water Quality Standards or Waste Discharge Requirements **Impact 4.8.1** Implementation of the proposed Project would increase runoff during construction as well as during operation through the introduction of buildings and impervious surfaces. Pollutants would be introduced to the site that could be transported offsite in stormwater runoff. Therefore, the Project's potential to violate water quality standards or waste discharge requirements is considered a **potentially significant impact**.	PS	**MM 4.8.1d** Outside trash container areas shall have leak proof covers on dumpsters, a screened enclosure, and drainage routed around the area. **MM 4.8.1e** Each diesel generator shall be outfitted with secondary containment to prevent spilled diesel from being carried off site by stormwater runoff.	LTS
Result in Substantial Erosion or Siltation On- or Off-Site **Impact 4.8.2** The Project would develop approximately 6.23 acres of vacant land. Implementation of the proposed Project could generate erosion during construction in association with disturbance of on-site soils. Therefore, the project's potential to result in substantial erosion or siltation on- or off-site considered a **potentially significant impact**.	PS	Implement mitigation measures MM 4.8.1a and MM 4.8.1b. **MM 4.8.2** The Project contractor shall install erosion barriers and apply soil stabilizers on exposed soil during site preparation and grading.	LTS

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Result in Substantial Flooding On- or Off-Site/Create or Contribute Runoff Exceeding Capacity **Impact 4.8.3** Implementation of the proposed Project would increase on-site runoff and contribute additional discharges to the City infrastructure and the IID drain system. Based on the adequacy of existing storm drainage infrastructure, the Project's potential to result in substantial flooding on- or off-site, or to create or contribute runoff exceeding capacity, is considered a **less than significant impact.**	LTS	None required.	LTS
Cumulative Impact to Hydrology and Water Quality **Impact 4.8.4** The proposed Project, in combination with existing, approved, proposed and other reasonably foreseeable projects in the Salton Sea watershed may contribute to the cumulative effects of degradation of water quality and changes in runoff patterns ultimately discharging to the Salton Sea. The proposed Project would not have any effect on flows to the Salton Sea. Therefore, cumulative impacts to hydrology and water quality are considered **less than cumulatively considerable**.	LCC	Implement Mitigation Measures MM 4.8.1a, MM 4.8.1b, MM 4.8.1c, MM 4.8.1d, MM 4.8.1e, and MM 4.8.2.	LCC

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NOISE			
Exposure to, or Generation of, Noise Levels in Excess of Standards **Impact 4.9.1** Activities associated with construction of the proposed Project would increase short-term noise levels on the Project parcels and vicinity. However, no noise levels established in the City of Calexico Noise Ordinance would be exceeded during construction. Therefore, a **less than significant impact** would occur in association with noise standards.	LTS	None required.	LTS
Excessive Ground-Borne Vibration or Ground-Borne Noise Levels **Impact 4.9.2** Ground-borne vibration levels associated with short-term Project construction and long-term operational activities would not exceed applicable ground-borne vibration criterion at nearby land uses. This impact would be considered **less than significant.**	LTS	None required.	LTS

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Substantial Permanent Increase in Ambient Noise Levels **Impact 4.9.3** Long-term operation of the proposed Trinity Cannabis Cultivation and Manufacturing Facility would result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels. This impact is considered **potentially significant.**	PS	**MM 4.9.3** Each cultivation and manufacturing facility in areas zoned Industrial shall install noise shielding equal to 10 dBA around fans and motors. The cultivation and manufacturing facility zoned Commercial Highway shall install shielding equal to 18 dBA around fans and motors.	LTS
Substantial Temporary or Periodic Increase in Ambient Noise Levels **Impact 4.9.4** Substantial temporary or periodic increases in ambient noise levels would occur in the Project vicinity above levels existing without the Project. This impact would be considered **potentially significant.**	PS	**MM 4.9.4a** The Project contractor shall install a heavy vinyl noise curtain around the Project parcels during construction to reduce sound levels. **MM 4.9.4b** Noise measurements shall be taken intermittently during construction to ensure that the City's noise standards are not exceeded beyond durations allowed by the City's Municipal Code.	LTS
Contribution to Cumulative Noise Levels **Impact 4.9.5** Due to the distance between the proposed Project and other proposed projects within one mile, the proposed Project would not result in a substantial contribution to cumulative noise levels. Therefore, cumulative noise impacts would be considered **less than cumulatively considerable.**	LCC	Implementation of project-specific mitigation measures MM 4.9.3 and MM 4.9.4a and MM 4.9.4b	LCC

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PUBLIC SERVICES AND UTILITIES			
Impacts to Fire Protection Services **Impact 4.10.1** The proposed Project would not result in the provision for new or physically altered fire facilities or the need for new or physically altered fire facilities. The Project Applicant(s) would pay Development Impact Fees to off-set the Project's impacts to fire protection services. Therefore, impacts to fire protection services are considered **less than significant**.	LTS	None required.	LTS
Cumulative Impacts to City of Calexico Fire Department Services **Impact 4.10.2** Development of the proposed Project, in combination with the other proposed, approved and reasonably foreseeable projects in the City of Calexico, would increase demand for fire protection in a community that is already understaffed. However, each individual project would be required to incorporate fire safety features and worker safety protocols in compliance with all applicable fire and occupational safety standards and codes. Therefore, cumulative impacts to CFD services are considered **less than cumulatively considerable**.	LCC	None required.	LCC

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Impacts to Law Enforcement Services **Impact 4.10.3** The proposed Project would not result in the provision for new or physically altered law enforcement facilities or the need for new or physically altered law enforcement. The Project Applicant(s) would pay Development Impact Fees to off-set the Project's impacts to law enforcement services. Therefore, impacts to law enforcement services are considered **less than significant**.	LTS	None required.	LTS
Cumulative Impacts to CPD Services **Impact 4.10.4** Development of the proposed Project, in combination with the other proposed, approved and reasonably foreseeable renewable projects in City of Calexico would result in an increased cumulative demand for law enforcement. However, each individual project would be required to incorporate security measures into their project. This Project would not result in an increase in population in the City of Calexico, therefore, cumulative impacts to the CPD services are considered **less than cumulatively considerable**.	LCC	None required.	LCC

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Water Distribution and Supply **Impact 4.10.5** The proposed Project would not exceed the capacity of the existing water distribution system nor result in the need for new water supply entitlements. Therefore, impacts associated with water distribution and supply are considered **less than significant**.	LTS	None required.	LTS
Cumulative Water Distribution and Water Supply Impacts **Impact 4.10.6** Development of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects, would result in an increased demand for water from the City of Calexico. The estimated water demand for the Project is 8,000 GPD for construction and 5,655 GPD for operation. When considered cumulatively with the other projects, the water demand of the proposed Project would not exceed the capacity of the existing water distribution system nor result in the need for new water supply entitlements. Therefore, cumulative water distribution and water supply impacts are considered **less than cumulatively considerable**.	LCC	None required.	LCC

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Wastewater Treatment and Conveyance Infrastructure Impacts **Impact 4.10.7** The proposed Project and surrounding area is currently served by several sewer lines. The average daily flow the proposed Project is anticipated to be 1,612 GPD. The City's wastewater system has adequate conveyance and treatment capacity to serve the proposed Project. Therefore, impacts to wastewater treatment and conveyance infrastructure are considered **less than significant**.	LTS	None required.	LTS
Cumulative Wastewater Treatment and Conveyance Infrastructure Impacts **Impact 4.10.8** Development of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects, would result in an increased demand for wastewater conveyance and treatment from the City of Calexico. The estimated wastewater generation for the Project is 1,612 GPD. When considered cumulatively with the other projects, the wastewater generation of the proposed Project would not exceed the capacity of the existing wastewater conveyance system nor result in the need for new wastewater treatment. Therefore, cumulative wastewater conveyance and treatment impacts are considered **less than cumulatively considerable**.	LCC	None required.	LCC

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Impacts to Solid Waste Service and Landfill Capacity **Impact 4.10.9** The Imperial Landfill has sufficient permitted capacity to accommodate solid waste generated by construction and operation of the proposed Project. Thus, a **less than significant impact** is identified with regard to solid waste service and landfill capacity.	LTS	None required.	LTS
Compliance with Federal, State, and Local Statutes and Regulations Related to Solid Waste **Impact 4.10.10** Waste from the cultivation process will be collected, properly managed and discarded in accordance with applicable local and State laws regarding disposal of cannabis waste. Thus, a **less than significant impact** is identified with regard to compliance with federal, state and local statutes and regulations.	LTS	None required.	LTS

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Cumulative Impacts to Solid Waste Service and Landfill Capacity **Impact 4.10.11** Implementation of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in the City of Calexico, would result in cumulative demand for solid waste service and landfill capacity. However, the proposed Project would not generate a substantial quantity of waste, pick-up service is available to serve the Project and sufficient landfill capacity is available. Therefore, cumulative impacts to solid waste service and landfill capacity would be **less than cumulatively considerable**.	LCC	None required.	LCC

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LCC = Less than Cumulatively Considerable
PS = Potentially Significant
CC = Cumulatively Considerable
SU = Significant and Unavoidable
NI = No Impact

TABLE ES-1
SUMMARY OF IMPACTS

IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Impacts to Electrical Service and Infrastructure **Impact 4.10.12** The proposed Project would require approximately 12.63 MW of electricity for Phase 1 and 2. Adequate capacity is available to serve Phase 1. IID will need to construct a new substation in order to have sufficient capacity to serve Phase 2. The increase in power demand and the expansion of existing infrastructure associated with Project operation is considered a **potentially significant impact**.	PS	**MM 4.10.12** The additional power requirements of the proposed project for Phase 2 or subsequent phases will require a new Distribution Substation with 2-25 MVA transformer banks 92/ 13.2 kV, starting with 1-25 MVA transformer. In addition, 92 kV "ED" transmission line extensions, associated distribution feeders/ backbones and distribution line extensions will be required. It is anticipated that the additional power load requirement of the proposed Project and projects in the area will require the acquisition and construction of a new substation (in the vicinity of Kloke and Cole Road). A minimum-dimensioned substation site of 2.25 acres that is satisfactory to IID will be required from the developer(s) in the area. The site location to be in proximity to the existing 92 kV "ED" line. All setbacks, rights-of-ways, sidewalks, berms, public utility easements, catch basins, etc.; are considered off-site improvements, and shall not be within the substation set aside area. It is estimated they would take another 9.75 acres. A new transmission corridor with 2-92 kV lines might need to be extended from existing 92 kV "ED" line to the proposed substation site. IID will require that additional rights-of-way be provided for the said	LTS

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
Impacts to Electrical Service and Infrastructure **Impact 4.10.12** The proposed Project would require approximately 12.63 MW of electricity for Phase 1 and 2. Adequate capacity is available to serve Phase 1. IID will need to construct a new substation in order to have sufficient capacity to serve Phase 2. The increase in power demand and the expansion of existing infrastructure associated with Project operation is considered a **potentially significant impact**.	PS	transmission line corridor. IID would assume responsibility for all environmental compliance. Upon completion of distribution substation, IID can accommodate an estimated 7 .2 MW connected load and 6.12 MW with time of use as submitted for phase 2 (buildings 1, 2 and 3), by adding one (1) breaker and one (1) feeder/ backbone line extension from new substation location to the proposed Project.	LTS
Cumulative Impacts to Electric Service **Impact 4.10.13** Implementation of the proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in the City of Calexico, would result in an increase in demand for electricity. The IID would need to construct a new substation in order to serve Phase 2 of the proposed Project as well as other cumulative development proposed nearby. Therefore, cumulative impacts to electrical service are considered **cumulatively considerable**.	LCC	None required.	LCC

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IMPACT	LEVEL OF IMPACT/ SIGNIFICANCE BEFORE MITIGATION	MITIGATION MEASURES	LEVEL OF IMPACT/ SIGNIFICANCE AFTER MITIGATION
TRANSPORTATION AND CIRCULATION			
Conflict with an Applicable Plan/Level of Service Standard (Existing Year 2018 Conditions) **Impact 4.11.1** Implementation of the proposed Project would add traffic to existing traffic volumes on West Cole Boulevard during construction and operation. The segment of West Cole Boulevard from Enterprise Boulevard to SR 111 would operate at LOS A with the addition of Project traffic. Therefore, conflicts with the General Plan Circulation Element and impacts to LOS standards would be **less than significant** with the addition of Project traffic.	LTS	None required.	LTS
Substantially Increase Hazards Due to a Design Feature **Impact 4.11.2** The proposed Project includes the construction of a new access points off of Sunset Boulevard and West Cole Boulevard. These access points will be required to be designed per all applicable City Standards. No new access points to a Caltrans facility are proposed. Therefore, the proposed Project is not anticipated to substantially increase hazards due to a design feature and this impact is considered **less than significant**.	LTS	None required.	LTS

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Cumulative Conflicts to Applicable Plan/Level of Service Standard **Impact 4.11.3** Implementation of the proposed Project, in combination with other cumulative project traffic, would add traffic to the segment West Cole Boulevard between Enterprise Boulevard and SR 111 as well as the intersections along this segment. The segment has adequate capacity remaining before it reaches LOS D and the intersections are currently above LOS C. Therefore, conflicts with the General Plan Circulation Element and impacts to LOS standards are considered **less than cumulatively considerable.**	LCC	None required.	LCC
ENERGY			
Wasteful, Inefficient, and Unnecessary Consumption of Energy **Impact 7.0.1** The Project would use energy in association with operation of four cultivation and manufacturing facilities and ancillary structures. The impact associated with wasteful, inefficient and unnecessary consumption of energy would be **less than significant**.	LTS	None required.	LTS

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Contribution to Cumulative Energy Usage **Impact 7.0.2** The proposed Project, in combination with other proposed, approved and reasonably foreseeable projects in the City of Calexico, would not develop land uses and patterns that cause wasteful, inefficient, and unnecessary consumption of energy or that would have excessive energy requirements for daily operation. Therefore, impacts to energy usage are **less than cumulatively considerable**.	LTS	None required.	LTS

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