

# **CHAPTER 2.0**

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## **PROJECT DESCRIPTION**



### 2.1 PROJECT DESCRIPTION

Information identified in this chapter regarding the proposed Trinity Cannabis Cultivation and Manufacturing Facility is based on technical studies, mapping, figures, and Uniform Applications submitted to the City of Calexico Planning Department by five Applicants. This Project Description was developed, in part, based on the project descriptions for each application prepared by Development Design & Engineering dated October 17, 2017. Information referring to land disturbance, equipment, schedule, mileage, and workforce is based on the most up-to-date information available from the Applicant(s) and generally represents conservative estimates.

#### 2.1.1 INTRODUCTION

This chapter of the Environmental Impact Report (EIR) describes the Trinity Cannabis Cultivation and Manufacturing Facility (“Project” or “proposed Project”) collectively proposed by Applicants Barrington Consulting, LLC; Calexico Distribution Company, LLC; Cole Boulevard Advisors, LLC; Desert Valley Partners, LLC; and Trinity 341, LLC. The Project is a proposal to build a Cannabis Cultivation and Manufacturing Facility on approximately 8.44 acres. The Project includes an existing structure at 2421 Enterprise Boulevard (Phase 1) and four vacant parcels, the latter to be developed with three cannabis cultivation and manufacturing facilities (Phase 2). A 10,000 square foot (sq. ft.) parcel is to be created for a transportation and distribution facility. The new parcel would be carved out of the existing parcel on which 2421 Enterprise Boulevard is located. The Project includes a total of 353,480 sq. ft. Each cannabis cultivation and manufacturing facility will require approximately 3 mega-watts (MW) of electricity per day and the transportation and distribution facility is anticipated to use approximately 200 to 240 volts of power. Phase 1 of the Project will be served with electricity from the Imperial Irrigation District (IID). The Applicant for Trinity 341, LLC is working towards procuring electricity for Phase 2 of the Project from IID.

#### 2.1.2 PROJECT BACKGROUND

On July 5, 2017, the City Council of the City of Calexico passed and approved Ordinance No. 1177, amending Title 17 (Zoning), Chapter 17.11, Article X, of the Calexico Municipal Code and Ordinance No. 1178, amending Title 5 (Business Licenses and Regulations), Article II, Chapter 5.96 of the Calexico Municipal Code, in order to regulate the cultivation, manufacturing, testing, distribution and transportation of medicinal and nonmedicinal adult use cannabis (including cannabis products and edible cannabis products) within the City of Calexico. The City’s regulations require that each proposed commercial cannabis activity be located within the City’s designated Cannabis Overlay Zone and must have both a conditional use permit, development agreement or other entitlements and a regulatory permit prior to operation. The proposed project has submitted five Uniform Applications requesting five Development Agreements.

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”, “Project” or “proposed Project”) located within the Cannabis Overlay Zone (COZ) in Calexico, California.

The Project includes one existing building at 2421 Enterprise Boulevard (Building A) that will be improved to accommodate cultivation and manufacturing. In addition, three other buildings (B, C and D) are proposed to be constructed with similar cultivation and manufacturing facilities on vacant Parcels 1,

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2 and 3. The Project also proposes a Transportation and Distribution Facility located north of the existing building at 2421 Enterprise Boulevard.

The focus of this EIR is on the construction and operation of the Trinity Cannabis Cultivation and Manufacturing Facility.

### 2.1.3 SITE LOCATION

The Project is proposed in the industrial area of the City of Calexico. Specifically, the Trinity Cannabis Cultivation and Manufacturing Facility is proposed in the area bordered by Enterprise Boulevard on the east, Sunset Boulevard on the west, West Cole Boulevard on the south, and vacant land to the north. All of the parcels are in an area known as the Portico Industrial Park.

**Figure 2.0-1** depicts the regional location of the Project. **Figure 2.0-2** shows the Project location within the context of the COZ. **Figure 2.0-3** shows the configuration of the various Project parcels and surrounding vicinity.

### 2.1.4 OWNERSHIP

The various parcels are under separate ownership as summarized in **Table 2.0-1** below. The acreage shown in the table is reflective of the proposed action associated with each Assessor's Parcel Number (APN).

**TABLE 2.0-1  
PARCEL OWNERSHIP**

Owner	APN	Acreage/Proposed Action	Zoning
Barrington Consulting, LLC	059-343-003, 059-343-014	2.00/Lot Merger	Industrial
Calexico Distribution Company, LLC	Pending creation of parcel	0.23/parcel carve-out of APN 059-343-018	Industrial
Cole Boulevard Advisors, LLC	059-343-006	2.00/Lot Line Adjustment	Commercial Highway
Desert Valley Partners, LLC	059-343-016	2.00/Lot Line Adjustment	Industrial
Trinity 341, LLC	059-343-018	2.21/Lot Line Adjustment	Industrial
<b>Total Acreage: 8.44</b>			

Source: DD&E 2017.

### 2.1.5 PROJECT CHARACTERISTICS

#### A. EXISTING USES AND FEATURES

As shown in **Table 2.0-1** above, the Project is proposed on five parcels. The parcel at 2421 Enterprise (APN 059-343-018) has been developed with a two-story building, loading dock and parking lot. A portion of APN 059-343-018 will be "carved out" to create a new parcel for the Transportation and Distribution Facility (**Figure 2.0-4** and **Figure 2.0-9**).

The remaining parcels (APNs 059-343-003, 059-343-014, 059-343-006, 059-343-016) are vacant land covered with scattered vegetation and stock-piles of soils. All of the parcels have been previously disturbed. The parcels are bordered by land zoned Industrial and Commercial Highway. Overhead infrastructure including street lights, telephone and electricity are located along West Cole Boulevard. A fire hydrant is also located on the north side of West Cole Boulevard immediately adjacent to the

southern border of proposed Parcel 3 (APN 059-343-016). All utilities can be readily extended or connected to in order to serve the proposed facilities.

### B. GENERAL PLAN AND ZONING DESIGNATIONS

The City of Calexico General Plan designates the Project parcels as “Industrial” (refer to Figure 4.1-2 in Section 4.1, Land Use). The City of Calexico Zoning Map designates the parcels as Industrial (IND) and Commercial Highway (CH) (refer to Figure 4.1-3 in Section 4.1, Land Use). All parcels are within the COZ (refer to **Figure 2.0-2** and Figure 4.1-4 in Section 4.1, Land Use), an area designated for commercial cannabis activities. The COZ encompasses approximately 354.02 acres within the area bounded by railroad tracks on the west; the Adler Canal on the north; West Van de Graff Avenue and Scaroni Avenue on the east; and Weakley Street and Camacho Road on the south. Development of a cannabis cultivation and manufacturing facility and transportation and distribution facility is consistent with the allowed uses within the COZ with a Development Agreement (DA). Note: Prior to initiating operations and as a continuing requisite to operating a commercial cannabis activity, the Applicants shall enter into a fully executed development agreement agreed to by the city council. Initially, applicants will be required to enter a DA with appropriate fiscal mitigation measures and terms as approved by the city council. Conditional Use Permits (CUPs) will not be issued until the effective date of an approved ballot measure authorizing the taxation of commercial cannabis activities in the city.

### C. PROJECT PHASES

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 (**Figure 2.0-5A**) is located on a single parcel (APN 059-343-018) proposed for a Lot Line Adjustment and parcel carve-out. The parcel is approximately 2.21 acres in size and zoned Industrial. The parcel fronts on Enterprise Boulevard to the east (**Figure 2.0-5B**). The Applicant proposes tenant improvements to accommodate cannabis cultivation and manufacturing within the existing structure (**Figure 2.0-5C**). The site would include 53 parking spaces. 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. A Building Permit for the tenant improvements was issued March 26, 2018. The interior demolition is anticipated to take place in mid-June with tenant improvements anticipated to be completed in mid-November 2018.

##### ***Transportation and Distribution Facility – Calexico Distribution Company, LLC***

The Transportation and Distribution Facility is a 10,000-sq. ft. (0.23 acres) parcel located immediately north of 2421 Enterprise Boulevard fronting on Enterprise Boulevard to the east. A new APN would be created for the Transportation and Distribution Facility from existing APN 059-343-018. The Transportation and Distribution Facility includes 15 parking spaces and includes a 1,056-sq. ft. transportation office. The Facility would be surrounded by an 8-foot tall steel fence and 8-foot tall concrete masonry unit fence. The action proposed by the application is to be determined upon approval

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of the parcel map. The Transportation and Distribution Facility would be constructed concurrent with the tenant improvements at 2421 Enterprise Boulevard (approximately April – September 2018).

### **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) proposed for a Lot Merger totaling 2.0 acres and zoned Industrial. The parcel fronts on Sunset Boulevard to the west (**Figure 2.0-6A**). Building B includes a ground-floor and mezzanine (**Figure 2.0-6B**). 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 first quarter of 2019 with completion by the fourth quarter of 2019.

#### ***Building C, Parcel 2 – Cole Boulevard Advisors, LLC***

Building C is a 48,300-sq. ft. structure proposed on a single parcel (APN 059-343-006) proposed for a Lot Line Adjustment totaling 2.00 acres and zoned Commercial Highway. The parcel fronts on Sunset Boulevard to the west (**Figure 2.0-7A**). Building C includes a ground-floor and mezzanine (**Figure 2.0-7B**). The site would include 57 parking spaces. The application requests a Lot Line Adjustment. Construction of Building C is projected to begin in the first quarter of 2019 with completion estimated by the fourth quarter of 2019.

#### ***Building D, Parcel 3 – Desert Valley Partners, LLC***

Building D is a 43,750-sq. ft. structure proposed on a single parcel (APN 059-343-016) proposed for a Lot Line Adjustment totaling 2.00 acres and zoned Industrial. The parcel fronts on Sunset Boulevard to the west (**Figure 2.0-8A**). Building B includes a ground-floor and mezzanine (**Figure 2.0-8B**). The site would include 62 parking spaces. The application requests a Lot Line Adjustment. Construction of Building D is projected to begin around April 2020 with targeted completion of October 2020.

## D. PROJECT DETAILS

### **Perimeter Fence**

All Project parcels will be surrounded by an 8-foot concrete masonry wall. Gates will be located at all driveways and internal gates will provide a second layer of security to the drive/loading aisles and delivery and parking area.

### **Electrical Demand**

Buildings A, B, C and D are expected to require approximately 3-MWs of electricity per day depending on the amount of production. The proposed Transportation and Distribution Facility electrical consumption is expected to use 200 to 240 volts of electricity. An existing transmission line currently extends to 2421 Enterprise Boulevard.

At buildout, the entire Trinity Cannabis Cultivation and Manufacturing Facility would require approximately 12.63 MW of electricity per day including electrical supply to the Transportation Office. Based on the phasing identified above, an additional 6,000 amps will be required by March 2019 and an additional 3,000 amps will be necessary by June 2020.

The Applicant for Trinity 341 has met with IID and secured a Will Serve letter (Barraza 2017) indicating the Utility has power available to serve Phase 1, Building A at 2421 Enterprise Boulevard. However, sufficient capacity is currently not available from IID to fulfill the electrical demands of Phase 2. To meet the demand, IID will be required to construct a new substation.

### ***On-Site Infrastructure***

An existing transformer and electrical switchgear are located on the east side of the Building A at 2421 Enterprise Boulevard. A new switchgear and a new transformer are proposed on the west side of the Building A. Likewise, Buildings B, C and D would each require a new transformer and a new switchgear. This infrastructure would be located in the equipment yard adjacent to each building.

### ***Diesel Generators***

A diesel generator is proposed to be sited in the equipment yard of each cultivation and manufacturing facility. The generator would serve as a source of back-up electricity in the event of a power outage.

### **Site Access**

#### ***Building A***

Building A would be accessed via two driveways on the east side of 2421 Enterprise Boulevard. A single 24-foot wide driveway would be located on the south side of the building accessing the parking lot. A 30-foot wide driveway serving as the main access would be located on the north side of Building A. A 30-foot easement access gate is proposed on the west side of the parcel allowing access between Building A and the internal drive/loading aisles located on Parcels 1, 2 and 3 to the west.

#### ***Building B***

Building B would be accessed via two driveways off of Sunset Boulevard on the west side of the parcels. The driveways connect to a 30-foot wide drive aisle that wraps around the building providing access to the loading area on the east side of Building B. A 30-foot easement access gate is proposed on the east side of the parcel allowing access between Parcels 1, 2 and 3 and 2421 Enterprise Boulevard to the east.

#### ***Building C***

Building C would be accessed via two driveways off of Sunset Boulevard on the west side of the parcel. The driveways connect to a 30-foot wide drive aisle that wraps around the building providing access to the loading area on the east side of Building C.

#### ***Building D***

Building D would be accessed via a single 30-foot driveway off of Sunset Boulevard on the west side of the parcel. The driveway connects to a 50-foot wide drive/loading aisle that wraps around the building providing access to the loading area on the east side of Building D. An emergency access driveway is also proposed to the south off of West Cole Boulevard.

### ***Transportation and Distribution Facility***

A 1,056-sq. ft. Transportation Office is identified on the western portion of the 10,000 sq. ft. parcel. The Transportation Office would be accessed via the main access (a 30-foot-wide driveway) located on the north side of 2421 Enterprise Boulevard.

### **Circulation**

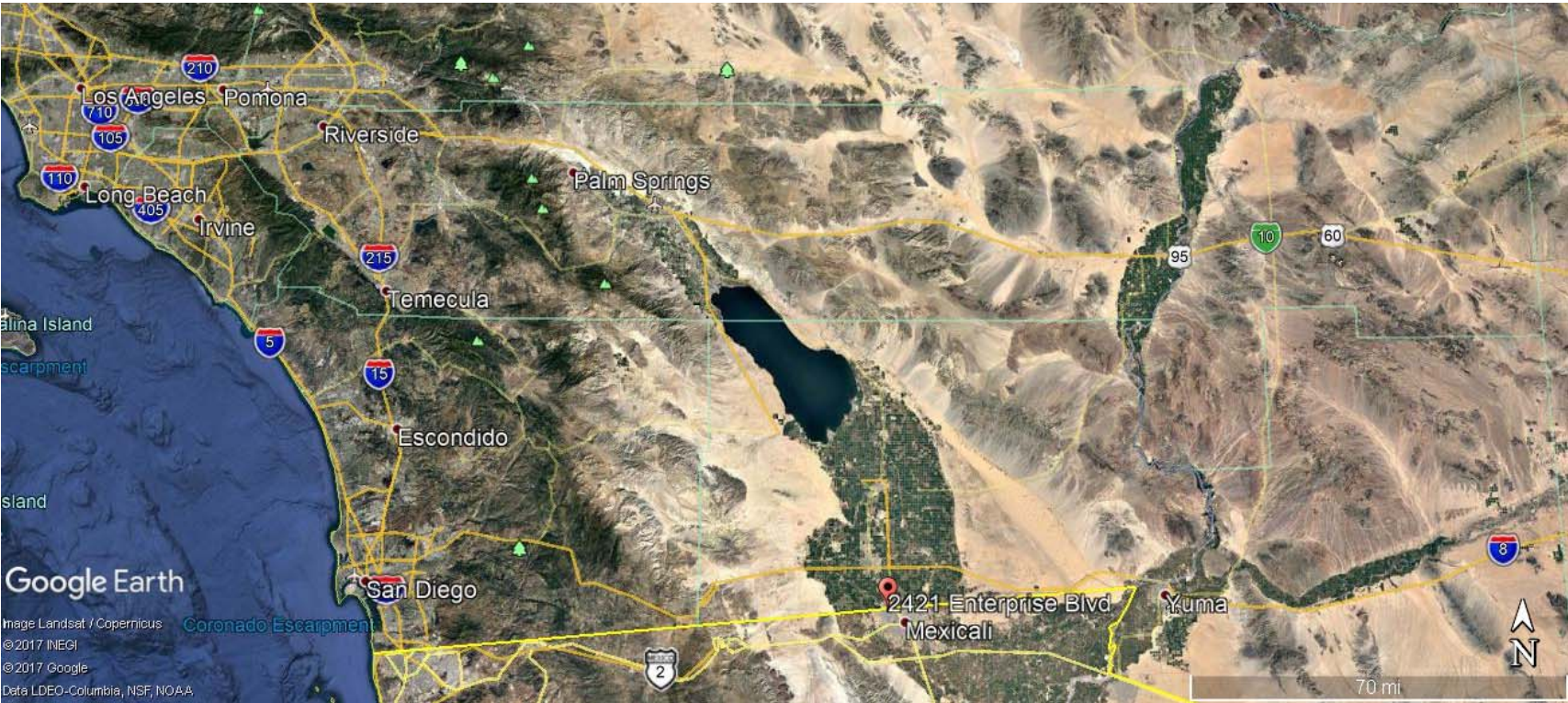
All four Cultivation and Manufacturing Facilities (Barrington Consulting, LLC; Cole Boulevard Advisors, LLC; Desert Valley Partners, LLC; and Trinity 341, LLC) and Calxico Distribution Company, LLC expect to transfer product to a local permitted cannabis transporter. The product will be transported via Interstate 8. The product will depart in the early morning (between 4 a.m. and 6 a.m. contingent on City regulations). Once product is delivered, the transporter will return to Imperial County. A distribution facility is also anticipated in Costa Mesa. All four cultivation and manufacturing facilities expect to have 20 to 30 key dispensary clients but will target as many as 140. Each Applicant intends to make approximately two deliveries per week.

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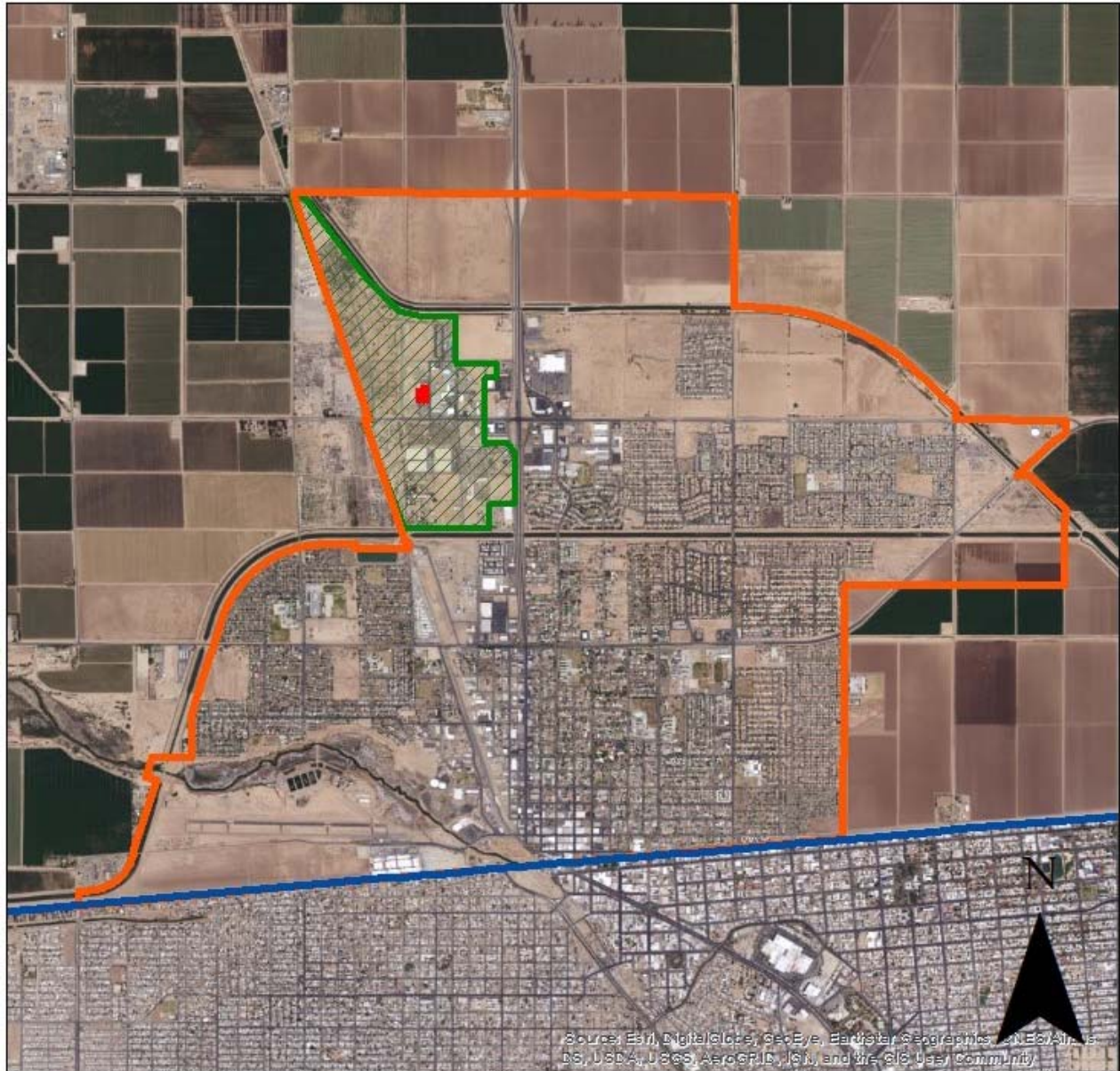




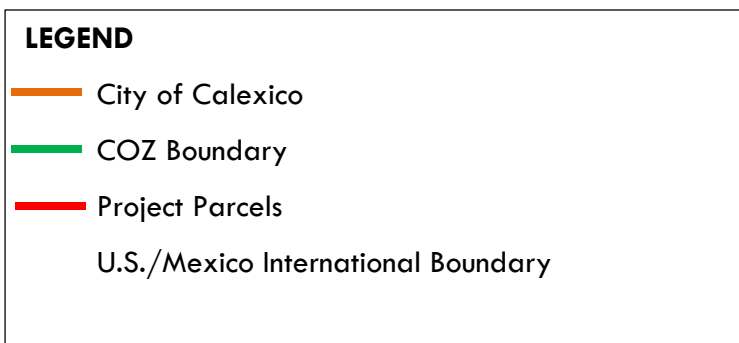
Source: Google Earth 2017.

**FIGURE 2.0-1  
REGIONAL LOCATION MAP**

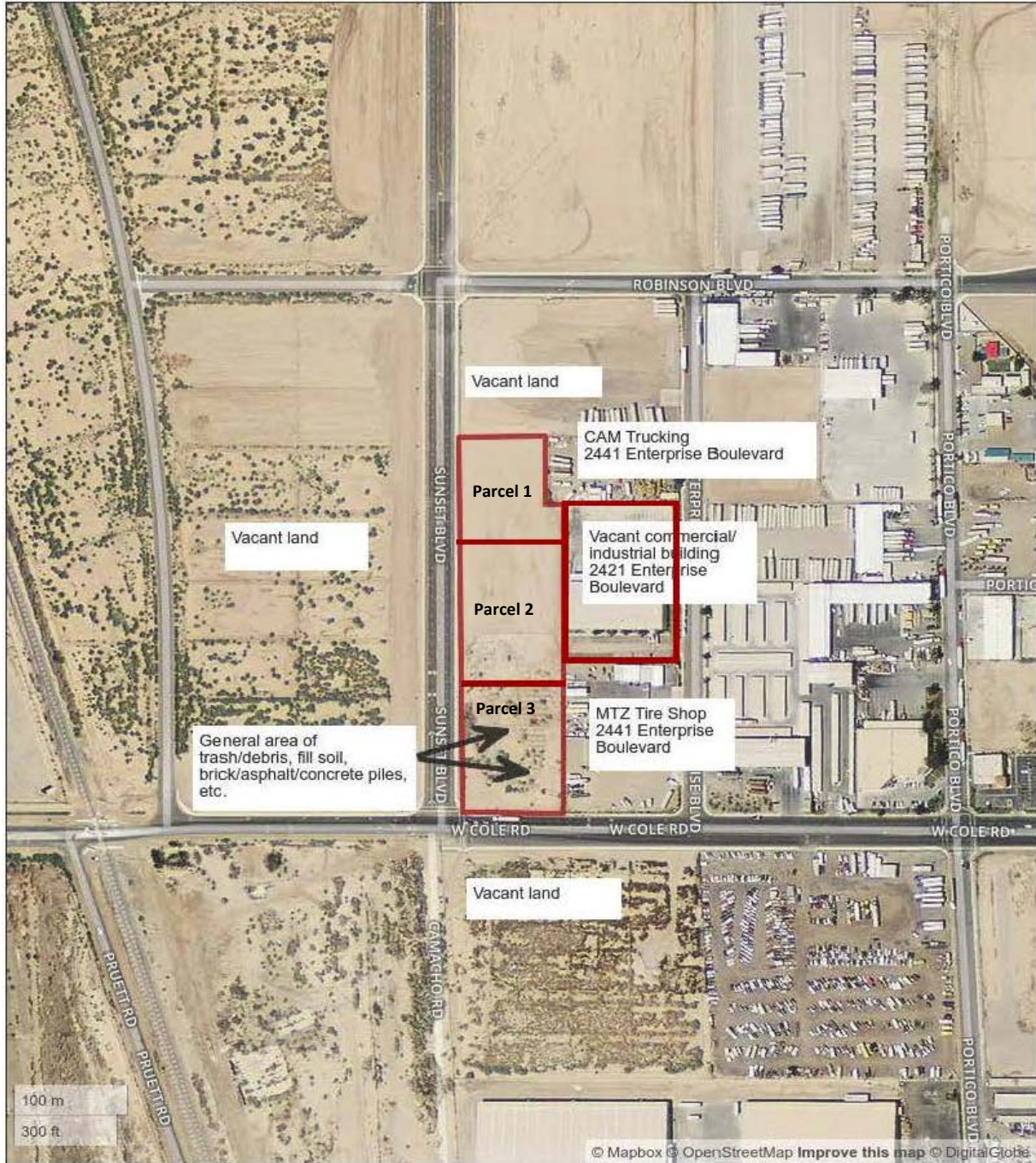
## 2.0 PROJECT DESCRIPTION



Source: DD&E 2017.



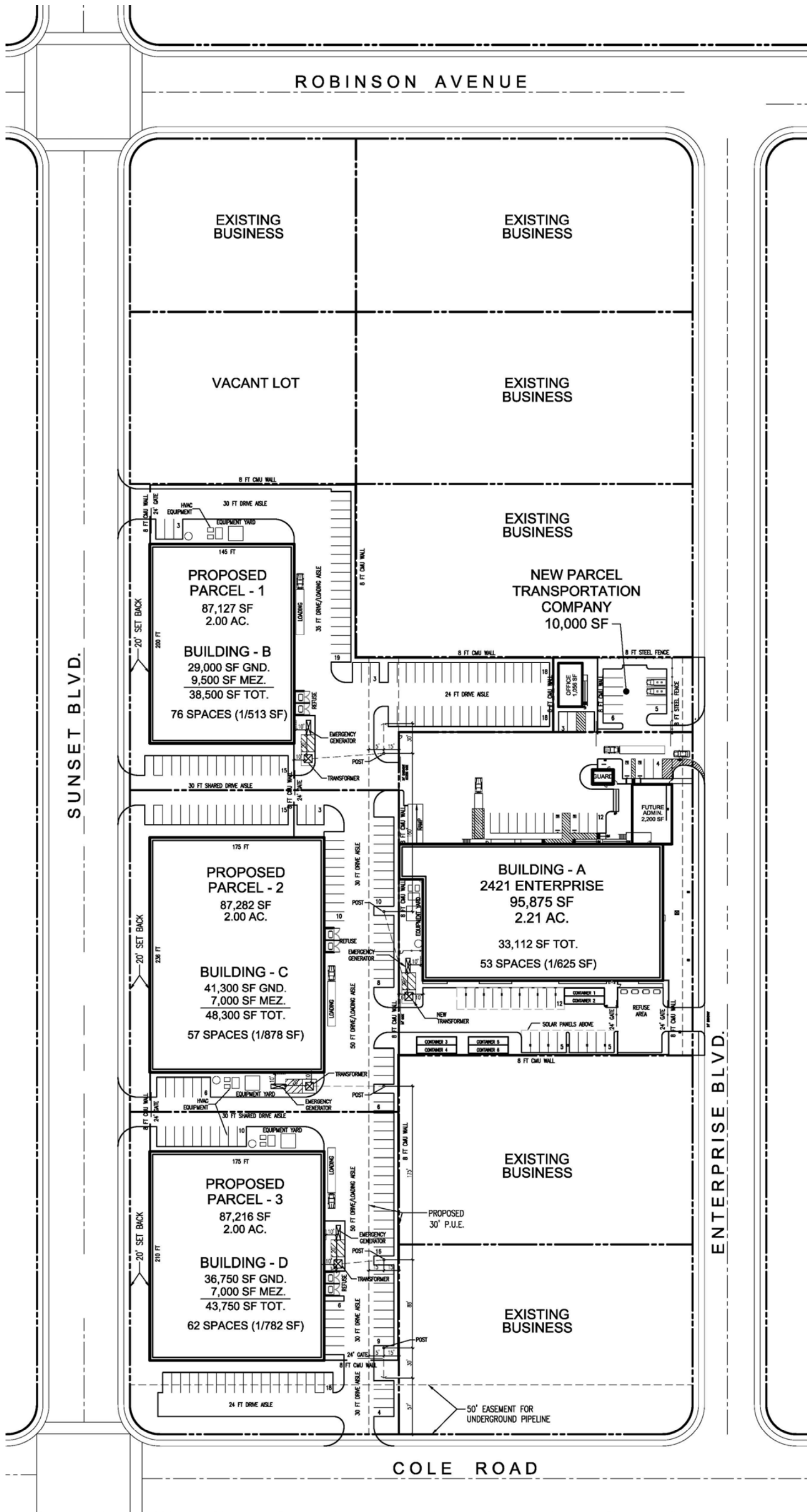
**FIGURE 2.0-2**  
**TRINITY CANNABIS CULTIVATION AND MANUFACTURING FACILITY LOCATION WITHIN**



Source: EMG 2017; EGI 2017.

**FIGURE 2.0-3  
PROJECT VICINITY MAP**

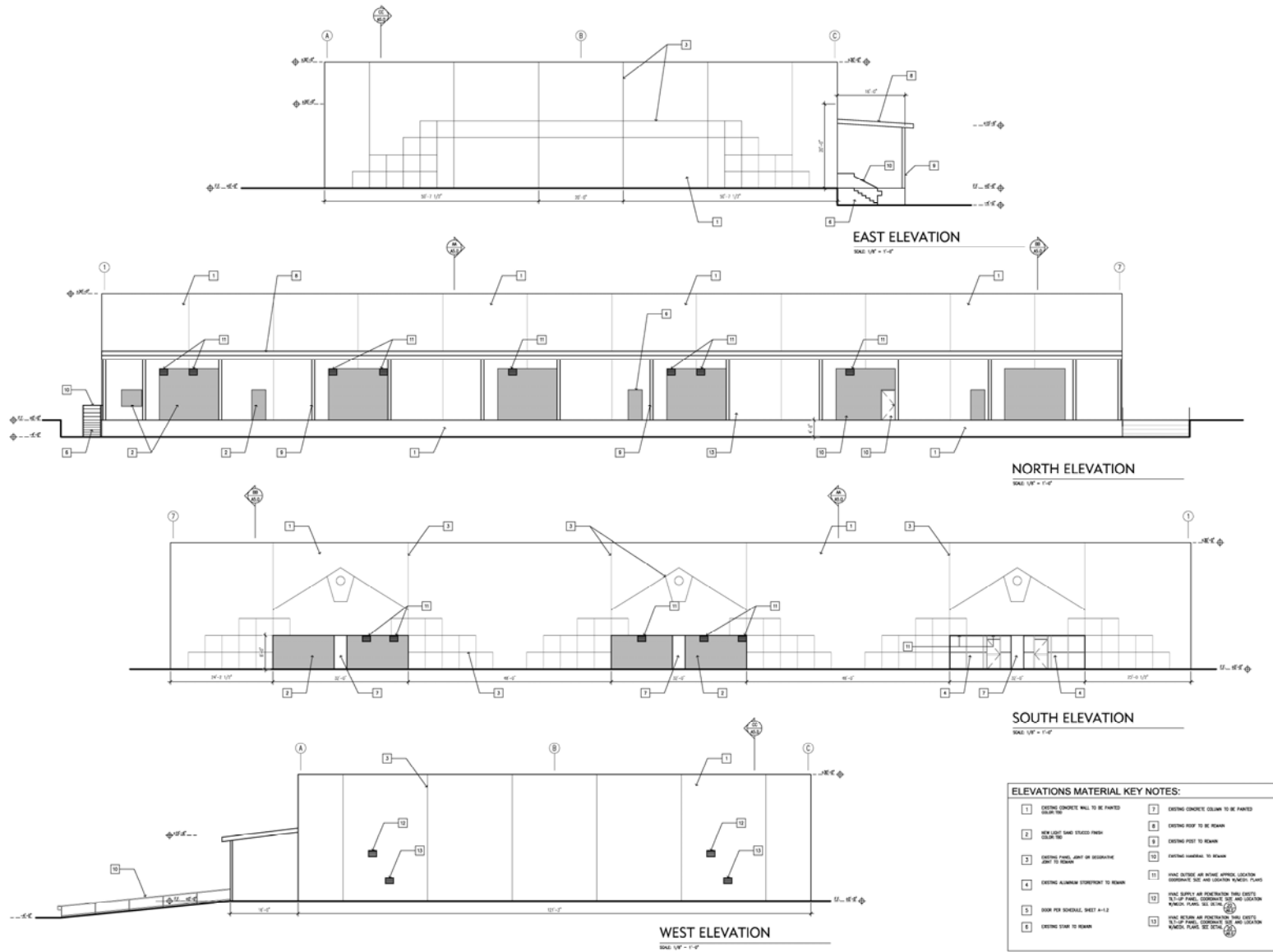
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FIGURE 2.0-4  
TRINITY CANNABIS CULTIVATION AND MANUFACTURING FACILITY OVERALL SITE

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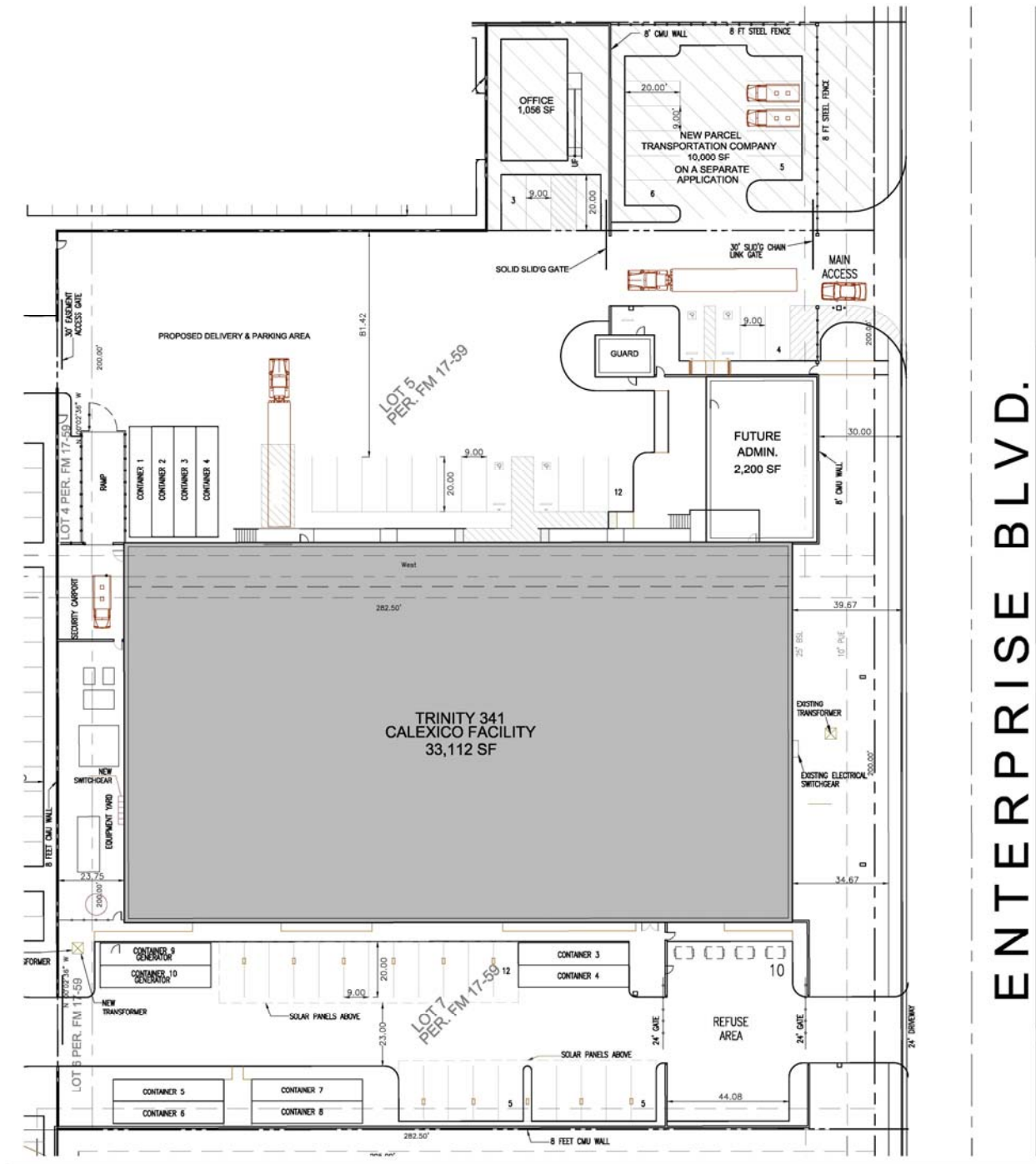


Source: McGee-Sharon Architects, Inc. 2018.

**FIGURE 2.0-5A**  
**2421 ENTERPRISE BOULEVARD ELEVATIONS (BUILDING A)**

Trinity Cannabis Cultivation and Manufacturing Facility  
Draft EIR

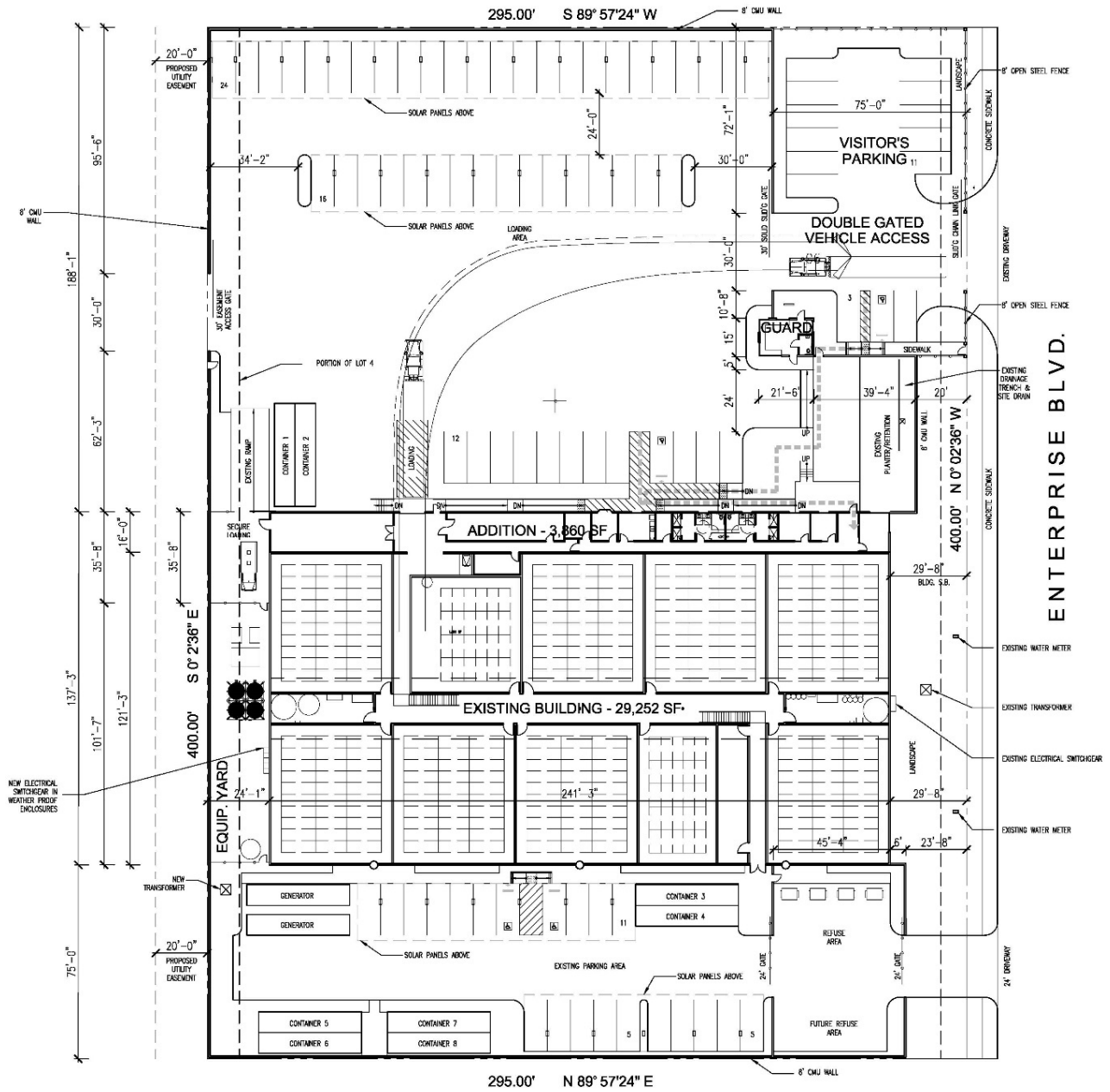
## 2.0 PROJECT DESCRIPTION



Source: McGee-Sharon Architects, Inc. 2017.

**FIGURE 2.0-5B**  
**2421 ENTERPRISE BOULEVARD SITE PLAN (BUILDING A)**

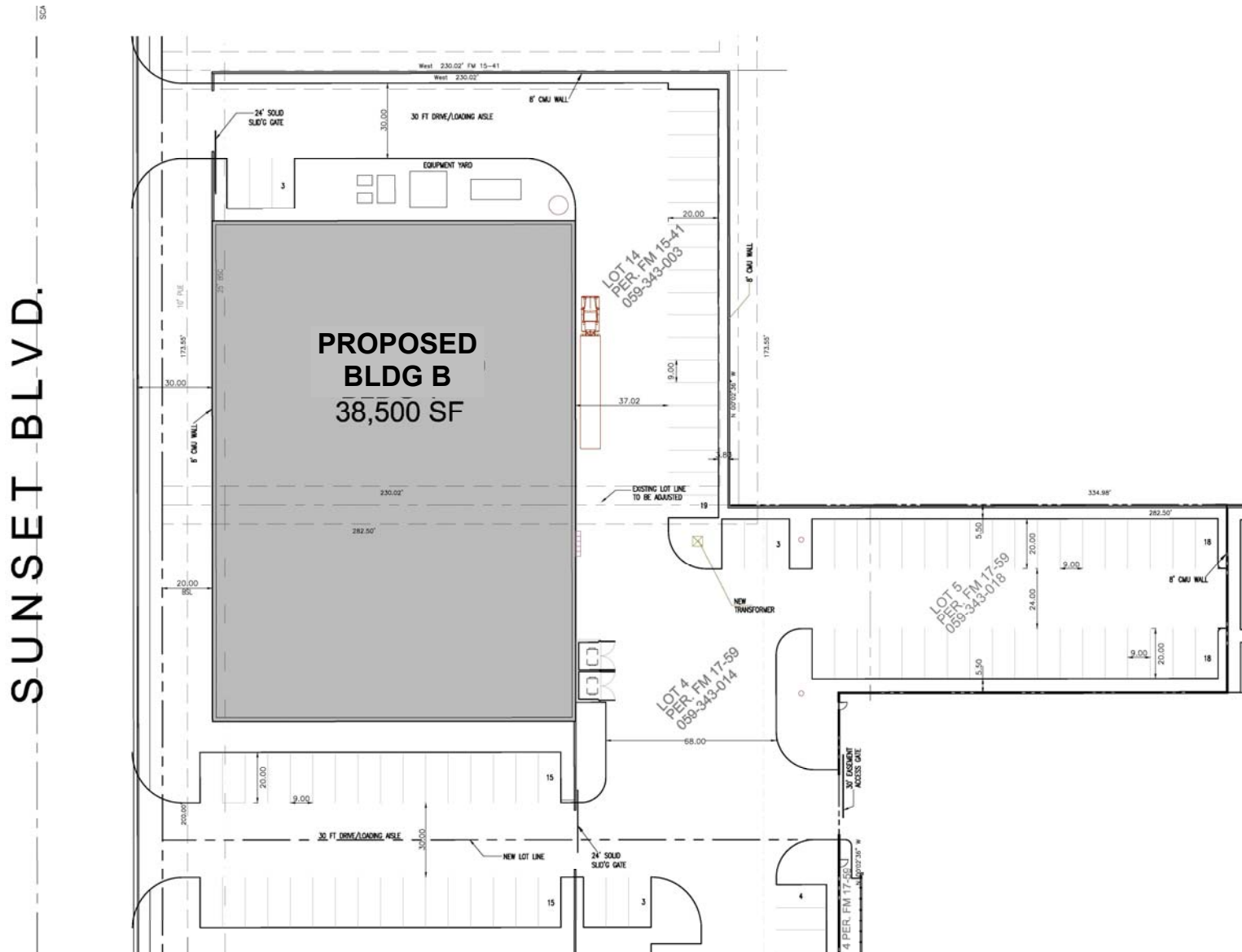
## 2.0 PROJECT DESCRIPTION



Source: McGee Sharon Architects, Inc. 2017.

**FIGURE 2.0-5B**  
**2421 ENTERPRISE BOULEVARD FLOOR PLAN (BUILDING A)**

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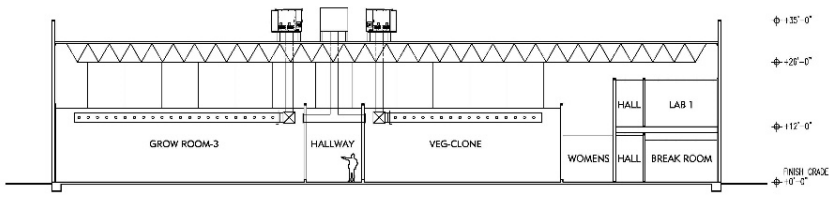
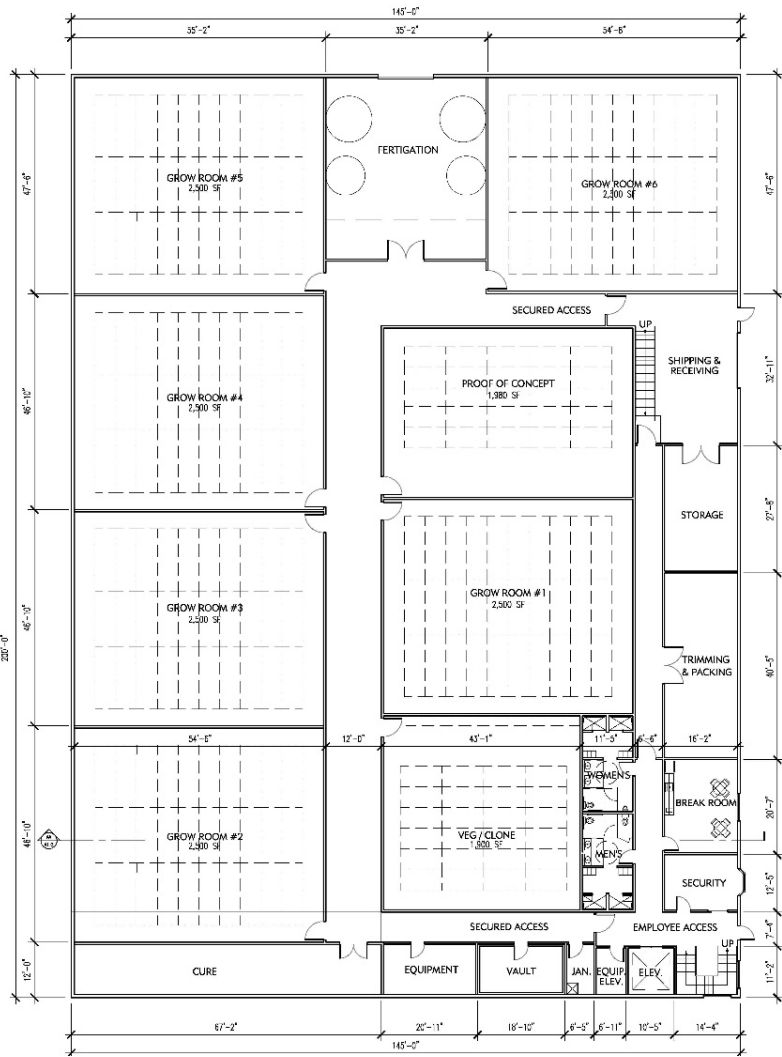


Source: McGee-Sharon Architects, Inc. 2017.

**FIGURE 2.0-6A**  
**PARCEL 1/BUILDING B SITE PLAN**

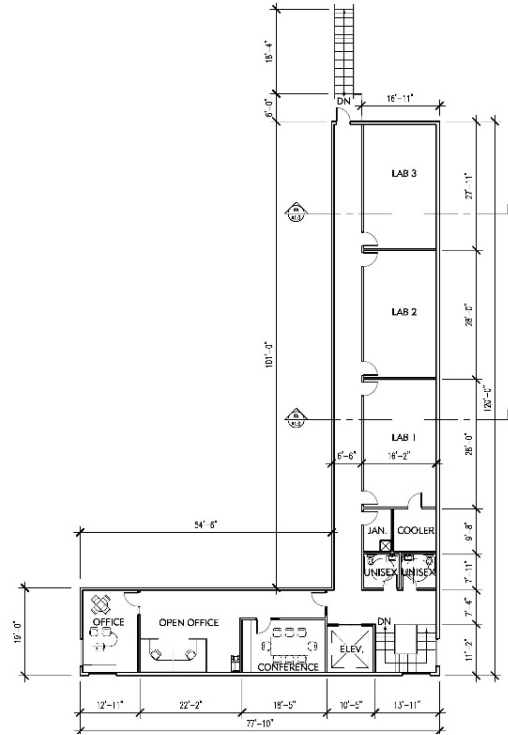


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CROSS SECTION AA  
SCALE: 3/32" = 1'-0"

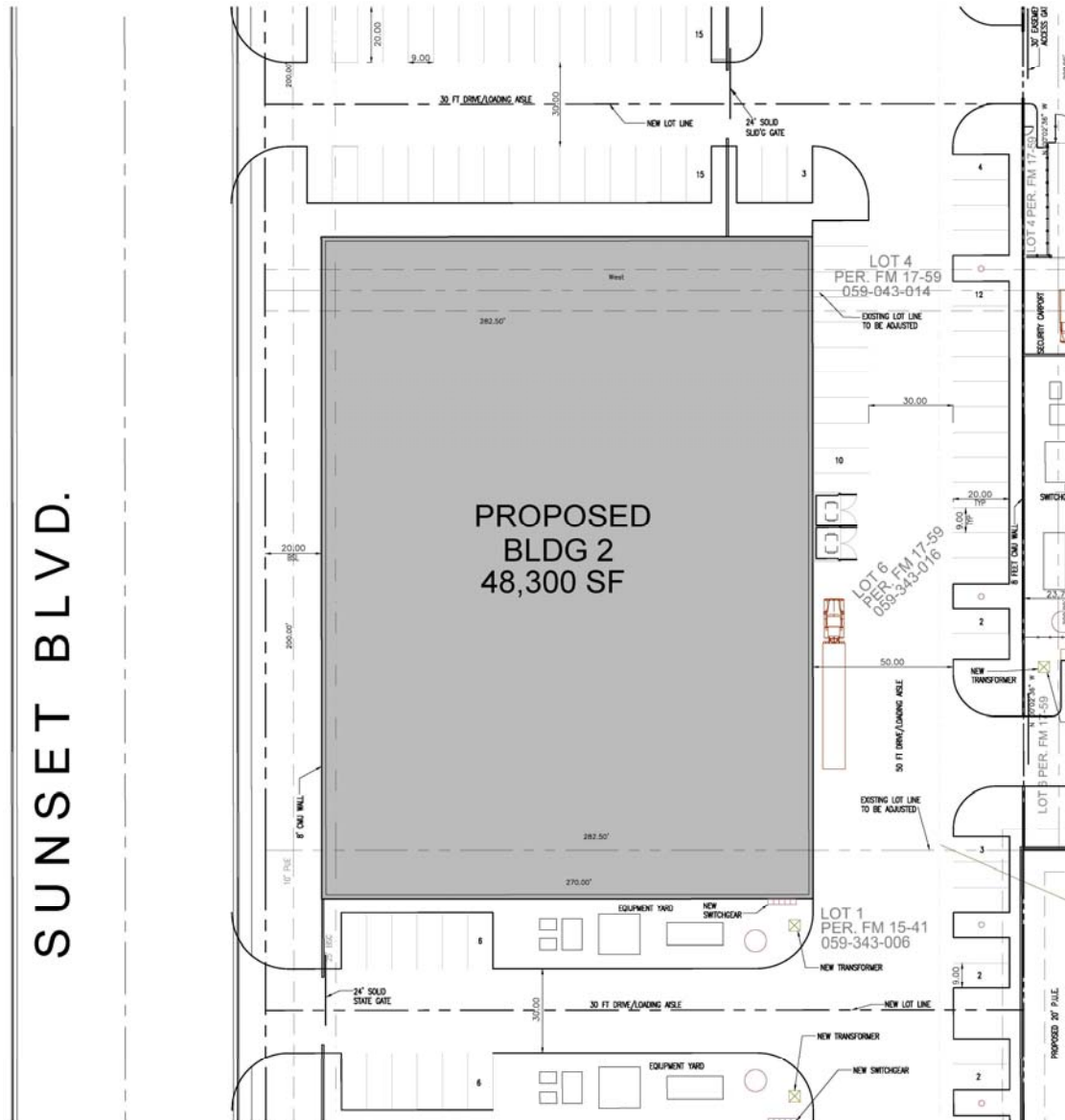
TRINITY 341 - PHASE II	
BUILDING - B	
GROUND LEVEL	= 29,000 SF
MEZZANINE 1	= 11,975 SF



Source: McGee Sharon Architects, Inc. 2017.

**FIGURE 2.0-6B**  
**PARCEL 1 / BUILDING B FLOOR PLAN**

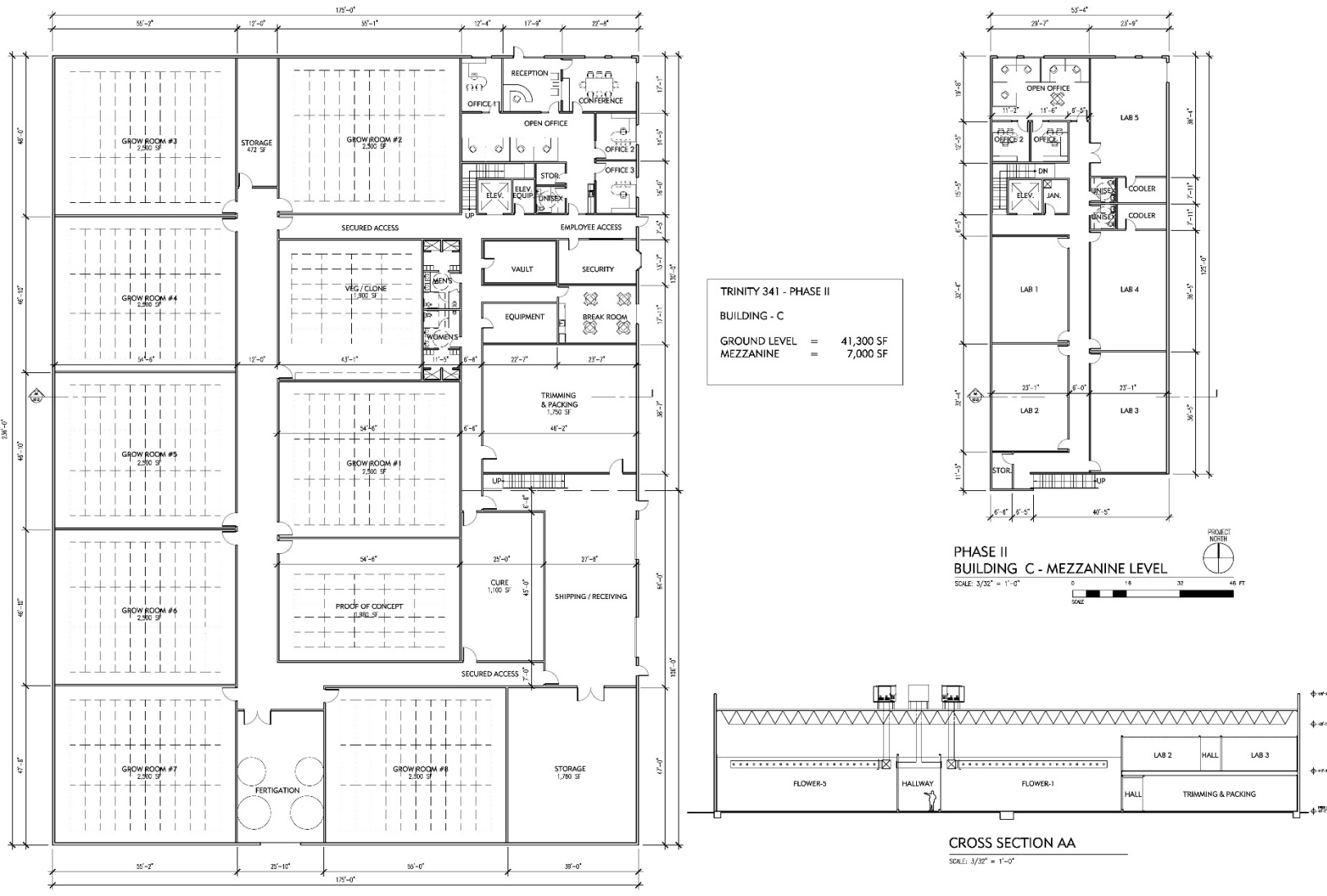
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Source: McGee Sharon Architects, Inc. 2017.

**FIGURE 2.0-7A**  
**PARCEL 2/BUILDING C SITE PLAN**

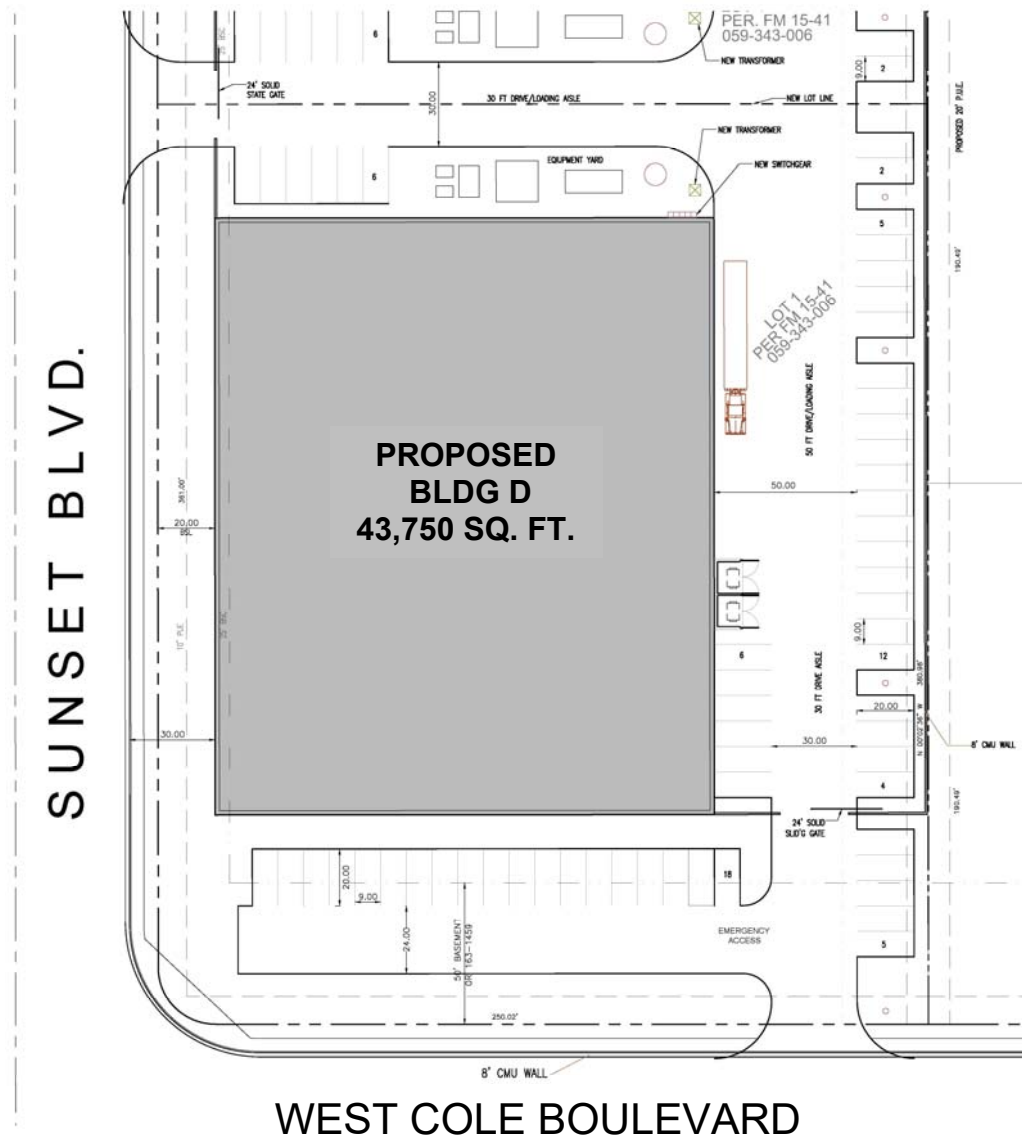
# 2.0 PROJECT DESCRIPTION



Source: McGee Sharon Architects, Inc. 2017.

**FIGURE 2.0-7B  
PARCEL 2/BUILDING C FLOOR PLAN**

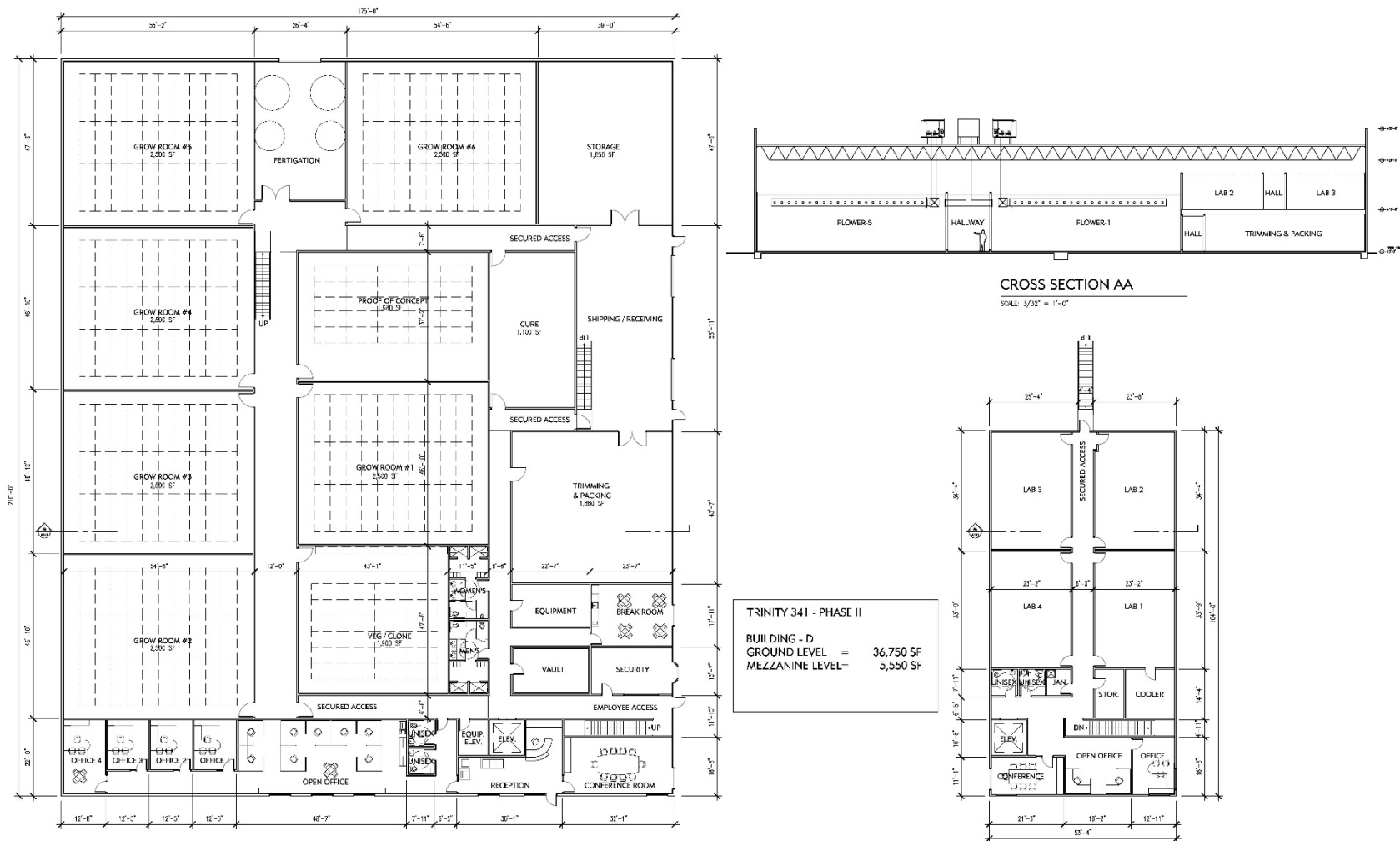
**2.0 PROJECT DESCRIPTION**



Source: McGee Sharon Architects, Inc. 2017.

**FIGURE 2.0-8A  
PARCEL 3/BUILDING D SITE PLAN**

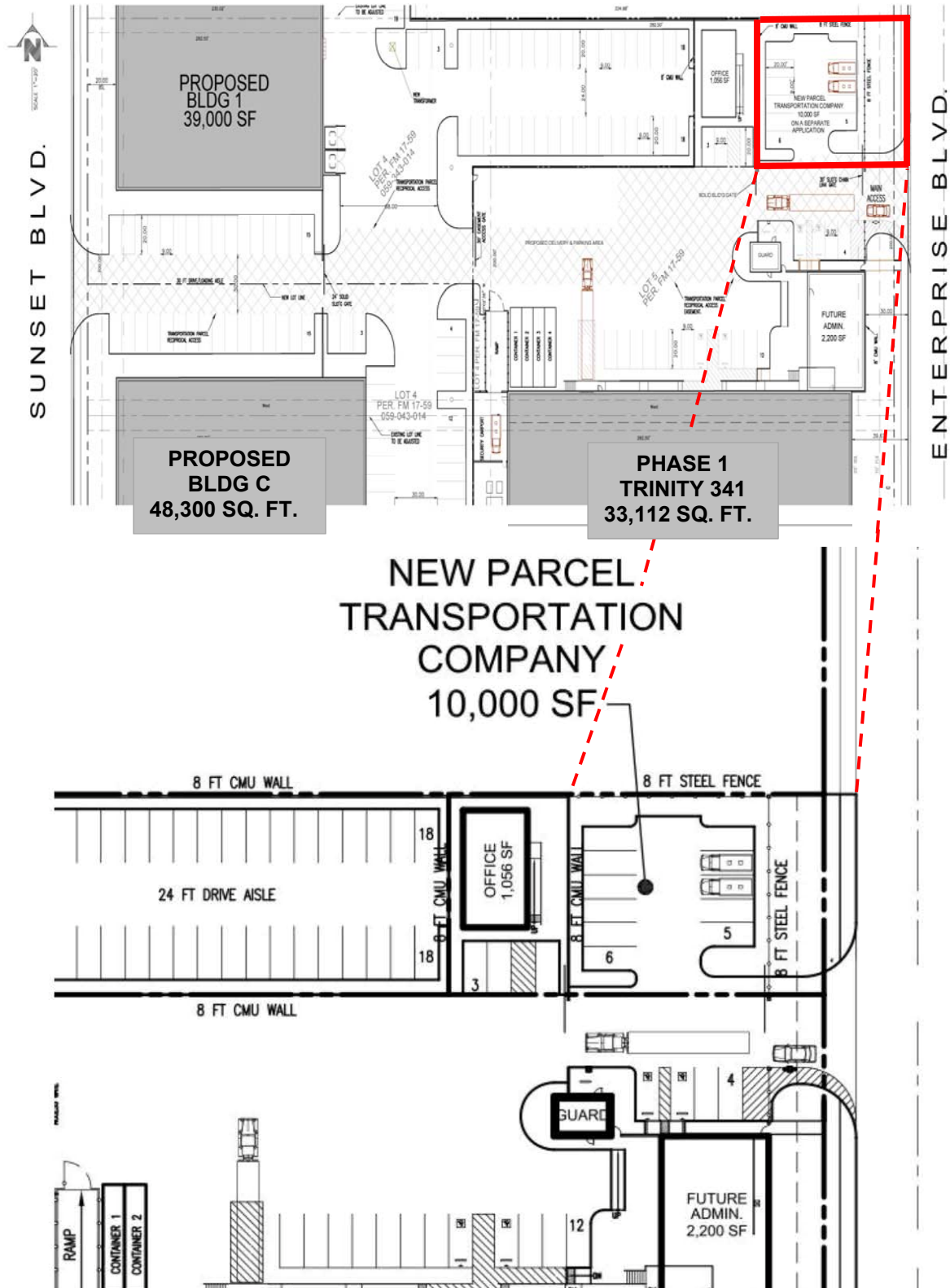
## 2.0 PROJECT DESCRIPTION



Source: McGee Sharon Architects, Inc. 2017.

**FIGURE 2.0-8B**  
**PARCEL 3/BUILDING D FLOOR PLAN**

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Source: McGee Sharon Architects, Inc. 2017.

**FIGURE 2.0-9**  
**TRANSPORTATION AND DISTRIBUTION FACILITY SITE PLAN**

### **Storm Water Retention**

The amount of storm water retention required for buildout of the three new buildings and transportation and distribution facility would be conveyed to an existing retention basin constructed for the Portico Industrial Park. No on-site drainage is proposed. Storm retention is available for the existing building at 2421 Enterprise Boulevard and the City has approved records documenting design of the retention facilities.

### **Supporting Plans**

As part of fulfilling the City's requirements for each Application, the following plans have been prepared and submitted by the Applicants (Barrington Consulting, LLC; Cole Boulevard Advisors, LLC; Desert Valley Partners, LLC; Trinity 341, LLC) for each of the four cannabis cultivation and manufacturing facilities and (Calexico Distribution Company, LLC) the transportation and distribution facility.

### ***Community Relations Plan and Neighborhood Responsibility Plan***

The Community Relations Plan and Neighborhood Responsibility Plan has been prepared to foster relationships with the Calexico Community and provide funding for initiatives that will benefit the citizens. Funds generated by each facility will be used for programs that provide education and benefit the youth of Calexico. The Plan includes an "On-Going Community Relations Concern Log" to document and address any concerns that may arise after the Plan is implemented.

All concerns received will be shared with the City Manager. The Plan Manager will request a meeting with the City Manager within 48 hours of the complaint. The City Manager can then decide if any other City officials need to be involved. Within 24 hours of the meeting, the Plan Manager will formally

respond to the person making the complaint and document the situation. The On-Going Community Relations Concern Log will also be shared with the City Manager when requested.

### ***Security Plan and Control Plan***

The Security and Control Plan addresses anticipated threats from every conceivable arena. This includes, but is not limited to, physical, cyber, and procedural security for all facilities and operations. The Plan is designed to give managers and employees the responsibility of ensuring, and working within, a secure environment. The Plan discusses security technology that will be used at each cultivation and manufacturing facility as well as the transportation and distribution office. This includes facility cameras, cultivation cameras, perimeter fencing and walls, lighting, intercom, building access control and contactless smart card readers. Cannabis tracking will also be employed using "Agrisoft" Seed to Sale software. The software provides tools marijuana-related businesses need for cannabis tracking and cannabis compliance.

### ***Emergency Response Plan***

The purpose of the Emergency Response Plan is to provide clear directives in the event of an emergency. The Plan provides instructions on what to do in the event of a natural disaster or man-made accident including evacuation, shelter-in-place, and lock down. Contacts of public emergency services and contractors are also included.

### ***Odor Control Plan***

The purpose of the Odor Control Plan is to ensure that the facility complies with State regulations and that emissions remain within permitted thresholds. Each cultivation and manufacturing facility would have internal odor mitigating activated carbon filters to dilute and absorb smell and odors as well as a

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“SKYPLUME” exhaust system that disburse odors using high speed evacuation fans forcing residual odor high into the air above each cultivation and manufacturing facility.

### **Employment**

Each of the four cultivation and manufacturing facilities proposes to employ 18 employees while the transportation and distribution facility proposes to employ 3 employees. At buildout, the Trinity Cannabis Cultivation and Manufacturing Facility would employ approximately 75 full-time employees. Each facility would operate during hours deemed appropriate by the City of Calexico with employees generally arriving before 6 a.m. and leaving before 6 p.m. No shifts are proposed.

## E. PROJECT CONSTRUCTION

### **Construction Activities**

Construction activities would primarily involve grubbing and grading of the Project parcels; trenching for underground utilities, and installation of security fencing. The preliminary site plan drawings are provided as **Figure 2.0-5A, Figure 2.0-6A, Figure 2.0-7A, Figure 2.0-8A and Figure 2.0-9**. Grading of all parcels would be done at the start of construction.

### **Dust Control**

Dust generated during construction would be controlled by watering. During grading, actively disturbed on-site areas would be watered at least three times a day as necessary to reduce fugitive dust emissions. In addition, equipment and vehicles speeds would be limited to 15-mile per hour (mph) during construction.

### **Water**

It is estimated that up to 10,000 gallons of water would be needed for site grading and dust control over the Project construction period for all the parcels to be developed (exclusive of tenant improvements at the existing building at 2421 Enterprise Boulevard). The 10,000 gallons would be needed only when dust levels are sufficient to require watering. Another 100 gallons on average per day would be needed for construction activities. On days without grading, approximately 1,000 gallons of water would be needed for dust suppression. Water for construction and dust control would be obtained from the City of Calexico.

### **Construction Duration**

Construction of the Project is expected to take approximately 30 months to complete. The duration of construction of each component and associated phase is shown below:

- Building A/Parcel 1 (2421 Enterprise Boulevard) – 5 months (Phase 1)
- Transportation and Distribution Facility – 5 months (Phase 1); construction would occur concurrent with 2421 Enterprise Boulevard
- Building B/Parcel 2 – 6 months (Phase 2)
- Building C/Parcel 3 – 6 months (Phase 2)
- Building D/Parcel 4 – 6 months (Phase 2)

### **Construction Workers**

The number of on-site construction workers for the proposed Project is not expected to exceed 20 workers at any one time. Parking would be provided for all construction workers on site.



### **Construction Traffic**

An estimated two trucks would deliver materials to the Project parcels at staggered times throughout the day during construction. To provide a worst-case scenario, all construction workers and trucks are assumed to arrive during the AM peak hour and depart during the PM peak hour. In addition, all workers are assumed to drive separate vehicles to and from the Project parcels.

The Project parcels would be accessed from SR 111 via West Cole Boulevard. It is assumed that approximately 5 percent of the construction worker traffic would travel to and from the west (i.e., in San Diego County and other local residential developments) while 95 percent would originate from various Imperial Valley cities to the east.

### **Staging Areas**

Staging and construction parking would be located on the parcels located on Sunset Boulevard. As the project is phased there are ample opportunities for on-site parking and no additional disturbance beyond what is currently anticipated would be necessary to accommodate staging of equipment and vehicles. All staging areas would be fully secured.

### **Stormwater**

Stormwater during construction would be managed under a General Permit for Discharges of Storm Water Associated with Construction Activity (NPDES No. CAS000002) (Construction General Permit Order 2010-2014-DWQ, effective February 14, 2011). Each Applicant would file a public Notice of Intent (NOI) to discharge stormwater and to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) for each parcel.

### **Waste**

Some waste material would be generated during site preparation activities. Any material gathered in association with clearing the site would be taken to an approved landfill. The Project may also contract with a recycler to properly recycle waste materials generated by construction (wire, cardboard, pallets, plastic, etc.).

Small amounts of trash would also be generated by construction workers. Construction related-waste would be transported to a local landfill authorized to accept this waste for disposal or an appropriate recycling center authorized to accept recyclable materials.

### **Hazardous Materials**

Very little hazardous waste (waste oil and lubricants, spill clean-ups, etc.) is expected to be generated from the Project during construction. Fuel that may be used on site during construction would be stored in secondary containment. The Project will also be required to comply with State and local laws that regulate and control hazardous materials.

### **Sanitation**

Portable toilets would be located on site during construction and sanitary waste would be removed by a local contractor.

### **Off-Site Construction Activities**

Off-site construction activities (those outside of the Project parcels) are contingent on the Parcel Map Requirements that will be set forth by the City of Calexico. All surrounding streets (Sunset Boulevard, West Cole Boulevard and Enterprise Boulevard) are in place. Sunset Boulevard is currently closed to traffic by barricades located just north of West Cole Boulevard. As a condition for the development of Parcels 1, 2 and 3, the City will require that Sunset Boulevard be dedicated and improved to City standards including the

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removal of the existing barricades (Alvarado, pers. comm., 2018b). The streetlights along Sunset Boulevard would also need to be energized. The City and IID are in discussions regarding provision of electricity to the streetlights. No new construction or disturbance would be necessary in order to energize the streetlights.

### F. PROJECT OPERATIONS

As construction of building is completed, the Trinity Cultivation and Manufacturing Project would expand its operations. At full buildout, the Project would employ approximately 75 full-time employees. Access to each of the four cultivation and manufacturing and the transportation and distribution facility would be infrequent and limited to authorized personnel.

#### **Cultivation Process**

The full product lifecycle consists of a series of seven steps which are necessary in order to cultivate and manufacture the cannabis crop/product before it is considered to be ready for market. **Table 2.0-2** summarizes the steps and **Figure 2.0-10** illustrates the cultivation and manufacturing process. Step: 1 in the cultivation process is considered to be the source of core genetics for propagation also known as “Mother Plants.” The Mother Plants are the base in the genetics pool of the crop/product. Step 2 of the process is known as Clone Propagation. During this step, clone propagation racks are propagated for a two-week clone rooting cycle. Once clone propagation is complete, the crop begins the two-week process of the vegetative stage of growth. Once the vegetative stage is complete Step 4 begins and is known as the flowering stage. The Flowering Growth Stage Area would occupy the majority of floorspace. Once the flowering stage is complete, Step 5, the curing stage begins. Step 5 takes up to approximately 7 days. After the curing process, Step 6 takes place as the crop is trimmed, manicured, packaged and staged. Step 6 will occur weekly through rotations and weekly harvest cycles.

**TABLE 2.0-2  
PROCESS FLOW**

<b>Steps in Process Flow for the Trinity Cannabis Cultivation and Manufacturing Facility</b>	
1	Core Genetics
2	Clone Propagation
3	Vegetative Stage
4	Flowering Stage
5	Curing Stage
6	Trimming Product and Packaging Stage
7	Waste Management

*Source: DD&E 2017.*

#### **Lighting**

Outdoor lighting will be tailored to meet all security needs and regulations for each facility. A photometric site plan (JEEE 2017) has been prepared showing how light will be disbursed throughout the Project parcels. Light will be contained within the boundaries of the parcels with minimal off-site light spillage.

#### **Water Usage**

In aggregate, the four cultivation facilities anticipate using 5,610 gross gallons of water per day (GPD) accessed from two tanks per facility capable of storing a total of 10,000 gallons of fresh water. However, approximately 70% of the water would be captured and recycled resulting in net use of approximately 1,071 GPD, strictly for cultivation purposes. Of the 5,610 gross GPD used for cultivation approximately 1,326 GPD

will be used strictly for employee purposes (e.g., sinks) resulting in an equivalent amount of wastewater. Non-employee related wastewater derived from cultivation is anticipated to be approximately 1,612 GPD. The water and waste water systems for cultivation and non-cultivation activities are separate with only the employee wastewater returning for wastewater treatment. The proposed Transportation Office is estimated to use approximately 30 to 45 GPD. At full buildout, the Project would use approximately 5,655 gross gallons of water per day (5,610 gallons + 45 gallons). The City of Calexico will provide water to serve the Project.

### **Wastewater**

Each Cultivation and Manufacturing Facility will be design with a 2,500-gallon wastewater tank. Each employee is estimated to generate 17 gallons of wastewater per day. Each cultivation and manufacturing facility would generate approximately 1,224 gallons (18 employees x 17 gallons x 4 cultivation and manufacturing facilities) of wastewater per day and the Transportation Office would generate approximately 60 gallons per day. In total the Project would generate 1,284 gallons (1,224 gallons + 60 gallons) of wastewater per day.

### ***Water Reclamation and Wastewater Discharge***

When processed through the reclamation system, up to a 1:4 waste to product water ratio can be achieved. This equates to approximately 315 gallons of concentrated waste stream being produced. The system has been designed to include a discharge tank sized at 1,050 gallons with approximately 3 days of capacity. Concentrated wastewater comes from the nutrient runoff from the benches, as well as the RO concentrate streams from both RO water makers. A thermal evaporator would further reduce the concentrated (1:4 ratio) waste stream. The residual product would be trucked off site and taken to an approved landfill in accordance with all laws deemed necessary through the Imperial County Environmental Health and Safety and the City of Calexico.

The design systems are dependent on many factors including nutrient runoff water quality and how that affects the product to wastewater ratio.

The system includes two 1,000-gallon condensate recapture tanks (stored water captured from the Heating Ventilation and Air Conditioning system) shown in the East fertigation room, for a total of 3,000 gallons of condensate capture for each cultivation and manufacturing facility. Each tank will have an overflow port which should be permanently connected to a floor drain or other type of drainage system. The water should not have to be filtered because it originates from the HVAC units and will never be in contact with the cannabis plants.

### **Waste**

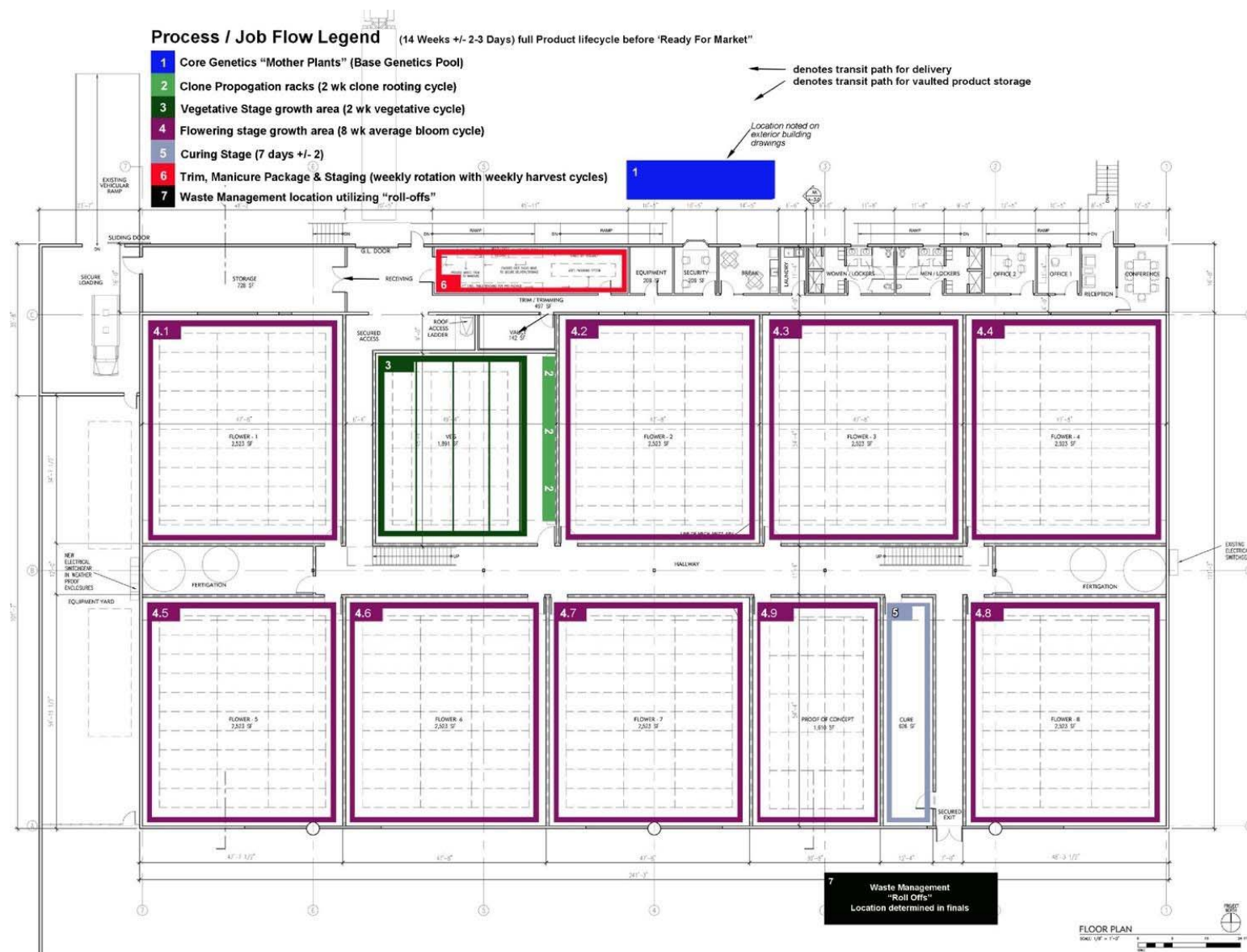
Waste from the cultivation process will be collected, properly managed and disposed of in compliance with applicable methods and in accordance with local and State laws. Methods vary depending on the type of waste being managed. The four cultivation and manufacturing facilities would produce various materials that require disposal. This includes “fan” leaves, “trim” and “rockwool cubes.”

Fan leaves are non-producing growth leaves that have no useable value. These leaves contain little or no tetrahydrocannabinol (THC), the psychoactive constituent in cannabis. Fan leaves are processed throughout the growing cycle and removed both throughout the cycle and during the harvest phase (Rhoades, pers. comm, 2018b). Because the leaves contain little to no THC, fan leaves are treated as waste.

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Source: McGee-Sharon Architects, Inc. 2017.

**FIGURE 2.0-10**  
**GENERAL CANNABIS CULTIVATION AND MANUFACTURING PROCESS/JOB FLOW DIAGRAM**

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Plant matter “trim” is the part of the plant that is trimmed from the final product. The trim will be stored securely inside the processing location. Trim will go through the “mulch” process and can be safely disposed of at any landfill or open land area. The final product for disposal does not contain any harmful contaminants because volatile methodologies for the extraction of cannabis oils and compounds will not be used during the manufacturing process. Likewise, trim does not contain any psychoactive properties.

Waste generated from the cultivation process will be in the form of “waste biomass” that will be placed in a roll-off dumpster. The residual leaves (“fan” and “trim” material) and extraction biomass material will dry out and begin to disintegrate quickly. The byproduct will have had most of its moisture content and oil content stripped from it and will degrade in the same manner as regular waste from the cultivation process. The waste biomass will be void of psychoactive properties as well as any contaminants. Approximately 500 pounds of waste biomass may be generated every 2 months (Irwin, pers. comm., 2018e).

The Applicant(s) will submit a “Special Waste Profile” to Republic Services (Leon, pers. comm., 2018d). The waste will be taken to the Imperial Landfill. Waste must remain in Imperial County (Leon, pers. comm., 2018a).

Plant growing medium would also be used at each cultivation and manufacturing facility and would be managed properly following use. The particular plant growing medium is known as “rockwool cubes”. This medium is produced by heating gypsum rock to extremely high temperatures then spinning the gypsum similar to cotton candy. The material is then compressed into 6-inch by 6-inch cubes providing a neutral medium for cultivation. At the end of the plant’s lifecycle, the cubes are rinsed of any nutrients of fertilizers. Approximately 2,000 pounds of rockwool waste would be generated each month (Irwin, pers. comm., 2018d). The material is accepted at regular landfill sites because it is a natural gypsum rock compound that contributes to effective landfill specifications.

Other waste generated by employees and non-cultivation activities would be disposed of as regular trash.

### **Hazardous Materials**

Each Applicant will operate its facility for cultivation and manufacturing without any harmful hazardous materials. The process of extracting oils uses a method of low heat and pressure. This extraction method is used to provide a safe, clean, non-harmful consumer product rather than using other volatiles such as butane or propane to extract oils. A hydraulic press may also be used to extract oils from the cannabis using electricity. Another extraction method uses a chilled alcohol rinse.

### **Fire Prevention**

A Fire Emergency Plan is a component of the Emergency Response Plan. In the event of a fire, the Fire Emergency Plan identifies management and staff roles and the logical sequence of events in order to keep all employees safe. The Plan as well as the facility site plan and layout are under review by the City of Calexico Fire Department.

## I. DESIGN FEATURES AND BEST MANAGEMENT PRACTICES

**Table 2.0-3** identifies draft Applicant-proposed measures that would be incorporated into the proposed Project to reduce impacts to resources.

**TABLE 2.0-3  
 APPLICANT PROPOSED MEASURES INCLUDED AS PART OF THE  
 TRINITY CANNABIS CULTIVATION AND MANUFACTURING FACILITY**

<b>AIR QUALITY</b>
Odor Control Plan Incorporation of SKYPLUME exhaust to dissipate odors.
<b>HAZARDS AND HAZARDOUS MATERIALS</b>
Using non-volatile methods to extract oils from cannabis.
<b>HYDROLOGY AND WATER QUALITY</b>
Recycling water during the cultivation and manufacturing process.
<b>PUBLIC SERVICES AND UTILITIES</b>
<b><i>Fire Prevention</i></b>
Using non-volatile methods to extract oils from cannabis. Fire Emergency Plan included as part of the Emergency Response Plan.
<b><i>Security</i></b>
Security and Control Plan

**2.2 ALTERNATIVES**

The alternatives to the proposed Project are briefly described below and are discussed in detail in Chapter 6.0, Alternatives.

**2.2.1 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 (refer to **Figure 6.0-1**).

**2.2.2 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) (refer to **Figure 6.0-2**). This alternative would use a patented carbon-neutral energy generation process in which aluminum reactors convert scrap aluminum 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.

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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.

### 2.2.3 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 MWs per day 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 per day 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 (refer to **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.

### 2.2.4 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. The Project site could remain in its existing condition as vacant land and an existing building at 2421 Enterprise Boulevard. Under this alternative Trinity 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 there by forgoing creation of 80 to 100 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.



**2.3 INTENDED USES OF THE EIR/AUTHORIZING ACTIONS**

The City will serve as the Lead Agency regarding CEQA and the Applicant’s request for a Development Agreement and other required City and state approvals.

**2.3.1 DISCRETIONARY ACTIONS AND APPROVALS**

**A. CITY OF CALEXICO**

In conformance with Sections 15050 and 15367 of the CEQA Guidelines, the City of Calexico has been designated the "lead agency," defined as, "the public agency which has the principal responsibility for carrying out or approving a project." Discretionary actions and approvals by the City of Calexico Planning Commission and/or City Council for the proposed Project or its alternatives may include, but are not limited to:

**Certification of the Final EIR**

After the required public review for the Draft EIR, the City will respond to written comments, edit the document, and produce a Final EIR to be considered for certification by the City Council prior to making a decision on the Project.

**Mitigation Monitoring and Reporting Program**

A Mitigation Monitoring and Reporting Program (MMRP) will be adopted as required by CEQA Guidelines Section 15097 to ensure that mitigation measures identified in the EIR are implemented as appropriate.

**Development Agreement**

Per section 17.11.1040, Conditional Use Permit (CUP) or Development Agreement (DA) required, of Ordinance No. 1177, the Applicants will be required to enter a DA with appropriate fiscal mitigation measures and terms as approved by the City Council. CUPs will not be issued until the effective date of an approved ballot measure authorizing the taxation of commercial cannabis activities in the City. Each Applicant may only apply for and operate up to two commercial cannabis activity facilities in the City. Each CUP or development agreement will include a condition or provision that the permittee shall also obtain and maintain a commercial cannabis activity regulatory permit required by this code.

**2.3.2 SUBSEQUENT/CONCURRENT ENTITLEMENTS TO IMPLEMENT THE PROPOSED PROJECT**

A variety of entitlement actions and permits may be required from the City of Calexico to implement the individual components of the proposed Project.

**A. CITY OF CALEXICO PLANNING DEPARTMENT**

- Uniform Application
- Site Plan Review
- Development Agreement
- Commercial Cannabis Activity Regulatory Permit Application
- Environmental Information Application
- Sign Permit
- Business License

**B. CITY OF CALEXICO BUILDING DEPARTMENT**

- Architectural Tenant Improvements & Approval
- Architectural Plan Review

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- Mechanical Engineering Plan Review & Approval
- Electrical Engineering Plan Review & Approval
- Landscape Plan Review and Approval

### C. CITY OF CALEXICO PUBLIC WORKS DEPARTMENT

- Parcel Map
- Grading Permit
- Water Sewer Connection Approval
- Storm Water Pollution Prevention Plan

### D. CITY OF CALEXICO FIRE DEPARTMENT

- Fire Sprinkler System Approval
- Site Plan Approval
- Building Permits
- Occupancy Permits

### 2.3.3 ACTIONS AND APPROVALS BY OTHER AGENCIES

Responsible Agencies are those agencies that have approval over one or more actions involved with development of the proposed Project. Trustee Agencies are state agencies that have approval or jurisdiction by law over natural resources affected by a project. These agencies may include, but are not limited to the following:

#### A. PERMIT REQUIREMENTS

The following permits/approvals may be required for the Project from the specified agencies, although some may not be applicable

- State of California – License from Bureau of Cannabis Control, CalCannabis Cultivation License, Manufactured Cannabis Safety Branch Manufacturing License
- State Water Resources Control – Stormwater Pollution Prevention Plan
- California Department of Toxic Substances – Certified Unified Program Agencies Hazardous Waste Business Plan
- Imperial Irrigation District – Customer Service Package (Service Connection); Permitted Electrical Plans from the City of Calexico; Environmental Clearance for all new transmission facilities for the Project; Encroachment Permit to underground canal.
- Imperial County Air Pollution Control District – Rule 310 Fees; Emission Assessment; Generator Approval; Construction Dust Control Plan.
- Imperial County Environmental Health and Safety – Inspections for sinks, drains and showers; permit for commercial kitchen (if proposed).
- Regional Water Quality Control Board – National Pollution Discharge Eliminate System Permit.