

SECTION 4.10

PUBLIC SERVICES AND UTILITIES

4.10 PUBLIC SERVICES AND UTILITIES

This section discusses public services and utilities that would serve the proposed Project. These include fire protection, law enforcement, water service, wastewater service, solid waste, and electricity. Each service is described with regards to existing resources available and potential impacts the proposed Project would have on each service or utility providers' ability to adequately respond to and serve the Project. The discussion is based on review of the adopted 2007 General Plan, the 2015 General Plan Update (as a source of background information) and correspondence with the service and utility providers including the City of Calexico, Calexico Fire Department (CFD), Calexico Police Department (CPD), Calexico Department of Public Works and the Imperial Irrigation District (IID).

4.10.1 FIRE PROTECTION

4.10.1.1 REGULATORY FRAMEWORK

A. STATE

Fire Codes and Guidelines

The 2016 California Fire Code (CFC) (Title 24, Part 9 of the California Code of Regulations) establishes regulations to safeguard against hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The CFC also establishes requirements intended to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California (CBSC 2016). The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas, hazardous materials and many other topics. The proposed Project would be required to be constructed in compliance with the CFC.

B. LOCAL

City of Calexico General Plan

The Safety Element of the Calexico General Plan establishes policies and programs to protect the community from risk associated with geologic hazards (including earthquakes and secondary hazards), flooding, fire (both wildland and urban), hazardous materials, the New River, peak load water supply and emergency access. The goals, objectives, and policies provide direction for development.

The Public Facilities/Services Element is not one of the state-required elements for including in the General Plan. Nevertheless, the City of Calexico has included this element to address sewer facilities, water systems, and storm drain facilities. It also addresses public services including police and fire. A key component of the discussion and policies is the implementation of mechanism to finance required capital improvements (City of Calexico 2007, p. 4-1). Calexico's current General Plan dated February 2007 was adopted by the City on May 1, 2007.

Table 4.10-1 provides a consistency analysis of the applicable General Plan goals, and objectives as they relate to the proposed Project. While this EIR analyzes the Project's consistency with the General Plan pursuant to State CEQA Guidelines Section 15125(d), the Calexico City Council ultimately determines consistency with the General Plan.

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**TABLE 4.10-1
CITY OF CALEXICO GENERAL PLAN CONSISTENCY ANALYSIS – FIRE PROTECTION**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
Safety Element		
8.5.1 Goal: To identify and minimize, the extent possible or feasible, the risks to persons and property caused by natural and human-induced hazards.		
Objective 3: Minimize the potential hazards to public health, safety and welfare and prevent the loss of life and property damage from natural and human-induced phenomena.		
<p>Policy 3d: The Calexico Fire Department should review and update the need for additional fire hydrants and shall work with the Calexico Water Department to ensure that adequate water pressures for fire flows are maintained.</p>	Yes	<p>The CFD has adopted the CFC, including its provisions of fire hydrant locations and distribution. Fire flow requirements are specified that must be met and maintained. This is analyzed in more detail ins subsection 4.10.3 Water Services, below. The CFD requires that all new construction follow all National Fire Protection Association (NFPA) fire sprinkler requirements and the building code. The proposed Project would be required to be compliant with the CFC, the Uniform Building Code, and the City’s Municipal Code for fire prevention. As part of the Project design review, the CFD would have input on the following: fire sprinkler system approval, site plan approval, building permits, and occupancy permits. Therefore, the proposed Project would be consistent with this policy.</p>
PUBLIC FACILITIES/SERVICES ELEMENT		
4.4.1 Goal To provide a full range of the necessary public facilities and services that are convenient to users, economical and reinforce a quality city identity.		
4.4.1.1 Facilities and Services Department		
Objective 1 To coordinate planning and development of Calexico’s public facilities and services with the private development sector, Calexico Unified School District, San Diego State University, Imperial County and other public agencies.		
<p>Policy 1: Establish funding mechanisms to fund the construction or expansion of public services and facilities necessitated by new development. The City should adopt appropriate ordinance(s) that implement impact fees and/or exactions on developers to fund the construction of public facilities caused by the new development. The ordinance should delineate methods</p>	Yes	<p>The City has adopted a Development Impact Fee schedule for residential, commercial and industrial projects. The development impact fee for industrial projects would be applied to all new construction and additions to existing structures and would be assessed on a per acre basis. Industrial projects would be required to pay \$21,730.00 in fees per acre (Alvarado, pers. comm. 2018c). Additionally, the CFD has an adopted fee schedule for sprinklers, fire inspections, fire alarms, etc.</p>

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**TABLE 4.10-1
CITY OF CALEXICO GENERAL PLAN CONSISTENCY ANALYSIS – FIRE PROTECTION**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
for fee calculation to allow developers to know in advance their expected fee.		The City has established funding mechanisms to fund construction or expansion of public services and facilities. The Project would be subject to these fees and is therefore consistent with this policy.
4.4.1.10 Fire Protection		
Objective 10: To provide an adequate service level of fire protection for all residents, businesses, and visitors to the City of Calexico.		
Policy 10a: Fire staffing and facilities shall be expanded commensurably to accommodate the needs of Calexico’s growing population.	No	The CDF currently has 32 professional firefighters. The City’s population estimate as of January 1, 2018 was 41,199 (DOF 2018). Based on the City’s adopted standard ratio of 1.5 firefighters per 1,000 residents, the City should have 62 firefighters ($41,199 \div 1,000 = 41.9 \times 1.5 \approx 62$). Thus, current staffing levels are considered inadequate according to the adopted performance standards. Fire staffing has not been expanded commensurate with Calexico’s population. The CFD has an adopted fee schedule for sprinklers, fire inspections, fire alarms, etc. However, Development Impact Fees are the only source of funding for CFD personnel and equipment. The Project is not consistent with this policy as there is a shortfall in firefighters that would not be offset by payment of Development Impact Fees. Additionally, response times are adequate at Station No. 2 but below average at Station No. 1.
Policy 10b: Require new development projects to pay fees proportional to their demand for fire services based on an updated Development Fee Ordinance or other legal and equitable funding mechanism.	Yes	As discussed under Policy 1, above, Industrial projects would be required to pay \$21,730.00 per acre in Development Impact Fees (Alvarado pers. comm. 2018c). The development impact fee for industrial projects would be applied to all new construction and additions to existing structures and would be assessed on a per acre basis. These fees would be used to offset impacts to fire services incurred from individual development projects. The Project would be subject to payment of these fees.

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**TABLE 4.10-1
CITY OF CALEXICO GENERAL PLAN CONSISTENCY ANALYSIS – FIRE PROTECTION**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
		Therefore, the proposed Project is consistent with this policy.
Policy 10f: The City should consider adopting a sprinkler ordinance in new residential, commercial, and/or industrial development.	Yes	The City has not adopted a Fire Sprinkler Ordinance. Fire sprinkler requirements are administered in accordance with all relevant State and National standards as described under Policy 3d above. The CDF has established permit fees for fire sprinkler systems and reviews fire sprinkler plans for conformance to code requirements. The Project would be subject to the ordinance and pay al applicable fees. Therefore, the proposed Project is consistent with this policy.
Policy 10h: Maintain the standard ratio of 1.5 firefighters per 1,000 residents.	No	As described under Policy 10a above, the City should have 62 firefighters based on the City’s adopted standard ratio of 1.5 firefighters per 1,000 residents. Currently, the CDF has 32 professional firefighters. While payment of Development Impact Fees would off-set impacts of the proposed Project, on an overall level the CFD would continue to operate below the standard ratio. Thus, the CFD’s staffing ratio is not consistent with policy.
Policy 10i: The City shall ensure that fire flows are maintained to meet the following minimum standards during maximum daily flow conditions: 1,500 gallons per minute (gpm) for residential; for two simultaneous fires for residential uses 1,000 gpm; and 2,500 gpm for commercial.		The proposed Project would be reviewed by the CFD to ensure that adequate fire flow is available to meet the required gpm. Therefore, the proposed Project is consistent with this Policy.

City of Calexico Fire Prevention Code

Chapter 15.20 of the City of Calexico’s Municipal Code is the Fire Prevention Code. The City’s Fire Prevention Code establishes a bureau of fire prevention and rules that all new construction must comply with to receive approval (City of Calexico Municipal Code). The proposed Project would be subject to the City of Calexico Fire Prevention Code.

City of Calexico Service Area Plan (2006)

The City of Calexico has established criteria that must be met to ensure that adequate fire protection services are provided. The Service Area Plan (SAP) also provides mitigation recommendations to achieve these goals. These include (City of Calexico 2006, p. 6-5):

- III. D. The City shall require new development projects to pay fees proportional to their demand for fire services.
- III. F. The City Planning Department shall regularly update the fire department on new development so that the fire department may evaluate their ability to support said projects.
- III. H. The City should consider adopting a sprinkler ordinance in new residential, commercial, and / or industrial development.
- III. J. The City shall enforce Calexico City Ordinance 890 Section 1 which imposes development impact fees prior to the issuance of building permits for new development where the City has discretionary authority to ensure that new development pays its “fair share” of expanded or new Fire Protection facilities and services. All fees collected, and any interest accrued pursuant to Ordinance 890 Section 1 shall be used by the City for the purposes of providing capital facilities and equipment, including station construction, station expansion, and fire apparatus. Until Ordinance 890 Section 1 is updated, which is underway, and will be completed upon adoption of this SAP, conditions of project approval shall address fee short falls to assure adequate fire services and facilities funding.

The 2006 SAP is in the process of being updated. Since publication of the 2006 SAP, the City has adopted a Development Impact Fee schedule for residential, commercial and industrial projects in Chapter 3.32 of the Municipal Code (Ordinance 1036). Industrial projects would be required to pay \$21,730.00 in fees per acre (Alvarado pers. comm. 2018c). The proposed Project would be required to pay approximately \$183,401.20 (8.44 acres x \$21,730.00).

4.10.1.2 EXISTING SETTING

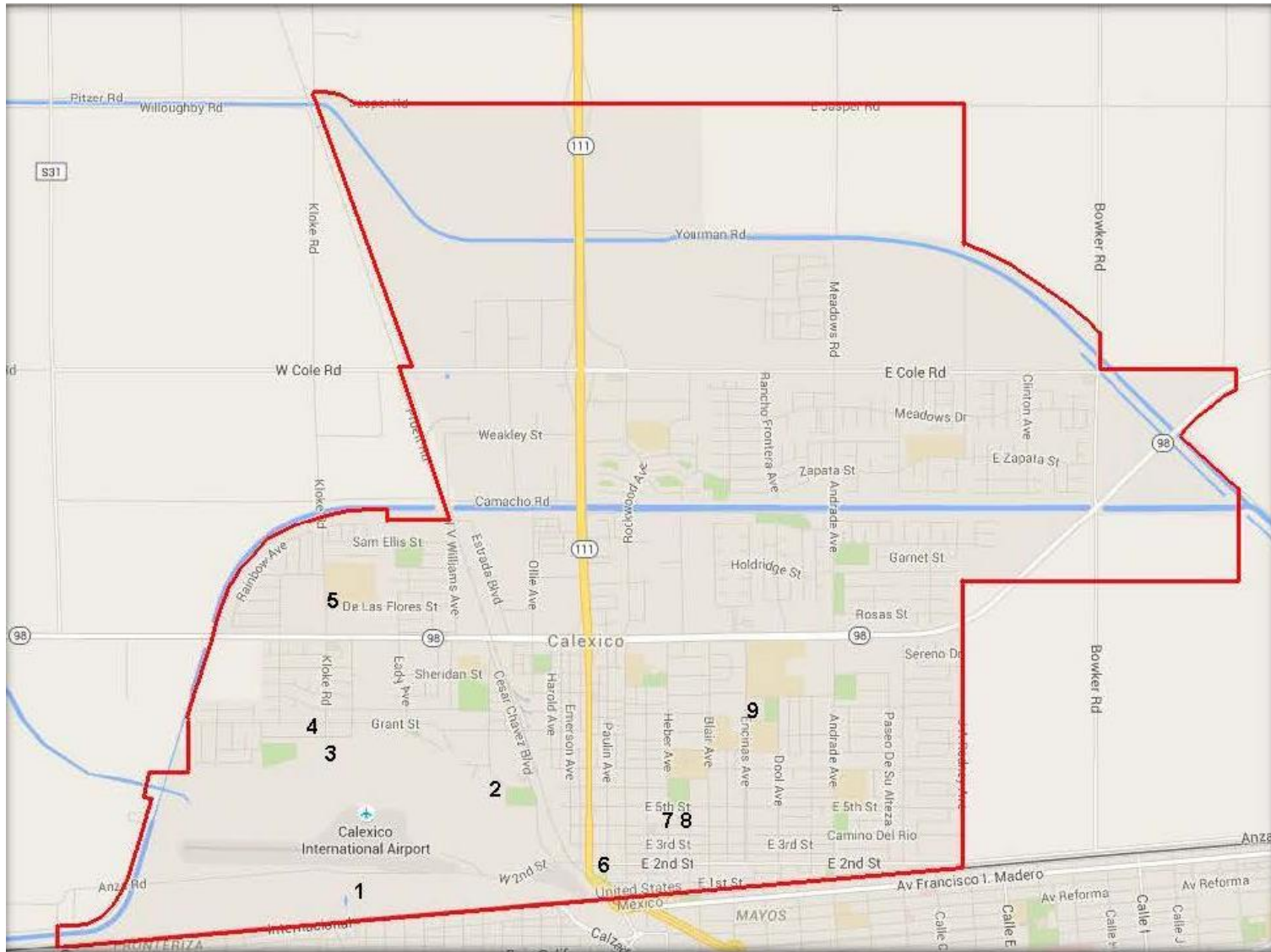
The Calexico Fire Department (CFD) protects approximately 9 square miles and services a population of greater than 39,000 residents (Favila pers. comm., 2018a). Fire suppression services are provided from the two Fire Stations (**Figure 4.10-1**). Fire Station Number 1, located at 415 East 5th Street, is in the center part of the City and serves the East side of Calexico. Station Number 1 also serves as Fire Department Headquarters. Station Number 1 houses Engine 3811, Truck 3891, Ambulance 2670 as its frontline apparatus. Station Number 1 is the busiest of both stations logging 4,808 incidents in 2017. The average response time to incidents by this station was 5 minutes and 18 seconds. This station is staffed with a minimum of 5 personnel. Truck 3891 is a three-person truck company, 2670 (ambulance) is staffed with 2 paramedics (Favila pers. comm. 2018a).

Fire Station Number 2 is located at 900 Grant Street on the west side of the City. It is approximately 1.4 miles south of the proposed Project and the closest station to the Project area. Station Number 2 houses Engine 3822 as its frontline apparatus and Engine 3821 as its reserve unit. Brush 11 is also assigned to Station Number 2 and is used for Wildland and Mutual Aid firefighting assignments. Station 2 houses a three-person engine company. Station two responded to just under 1,500 calls in 2017. The average response time was 4 minutes and 27 seconds (Favila pers. comm. 2018a). These response times are considered acceptable (Favila pers. comm. 2018c).

The Fire Department is responsible for providing Emergency Paramedic Services throughout the City limits of Calexico and in some cases, beyond. The current paramedic program uses a combination of first responder paramedic engine and truck companies operating from two fire stations, and two Advanced Life Support (ALS) Medic Units. This allows for advanced life support to reach the patient as quickly as

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Source: City of Calexico 2015a.

- | | | |
|------------------------------|--|-----------------------------|
| 1 Wastewater Treatment Plant | 4 Fire Station 2 | 7 Police Department/Station |
| 2 Water Treatment Plant | 5 Branch Library | 8 Fire Department/Station 1 |
| 3 Nosotros Police Substation | 6 International Park Police Substation | 9 Camarena Memorial Library |

**FIGURE 4.10-1
MAP OF PUBLIC FACILITIES**

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possible. The ambulance is staffed with a combination of Firefighter Paramedics, and Firefighter Emergency Medical Technicians (EMT) who have been cross-trained in both firefighting and emergency medical techniques for advanced life support (ALS) (City of Calexico 2015a, p. 4-5).

The City of Calexico has a fire hazard rating of 5/5x from the ISO (Insurance Service Office) Commercial Risk Services, Inc. The designation 5/5x indicates there are mixed rating depending on the location of the hydrants and fire stations. The rating is based on a 1 to 10 scale with 10 being the greatest risk. To have a “5” rating, structures must be within 1,000 feet of a fire hydrant and within five (5) miles of a fire station. A flow test review was conducted by the City water department and there were no significant issues for fire hydrant flow (City of Calexico 2015a, p. 8-9).

There are 32 professional firefighters employed by the CFD. The Department is also working toward adding reserve firefighters. Currently, the CFD has one (1) chief, six (6) fire captains, six (6) engineers, eighteen (18) paid firefighters, one (1) fire inspector and an administrative staff (City of Calexico 2015a, p. 4-5). Current staffing levels were considered inadequate according to the performance standards of the adopted *Calexico General Plan*. The adopted standard ratio is 1.5 firefighters per 1,000 residents (City of Calexico 2007, p. 4-17). However, the City’s population estimate as of January 1, 2018 was 41,199 (DOF 2018). Based on the City’s adopted standard ratio of 1.5 firefighters per 1,000 residents, the City should have 62 firefighters ($41,199 \div 1,000 = 41.2 \times 1.5 \approx 62$). Thus, current staffing levels are considered inadequate according to the adopted performance standards.

4.10.1.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the CEQA Guidelines Appendix G thresholds of significance. The Project would have a significant impact to fire protection services if it would:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities, need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for fire protection.

B. METHODOLOGY

The evaluation of potential impacts to fire protection services associated with construction and operation of the proposed Project was based on review of the Project parcels and existing building at 2421 Enterprise Boulevard and the surrounding area. The Security Control Plan and Emergency Response Plan, along with a series of questions regarding fire protection services was also submitted to Fire Chief Diego Favila for review and input.

C. PROJECT IMPACTS AND MITIGATION MEASURES

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**.

The proposed Project does not include residential development that would cause direct population growth though the project would create approximately 78 new jobs. The unemployment rate in Calexico

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is high and it is unlikely that cultivation jobs would stimulate relocation. Given the type of employment opportunities that would be created as well as the high unemployment rate in Calexico, it is anticipated that new jobs would be filled by workers from the area. Therefore, the proposed Project would not induce direct or indirect population growth in the City of Calexico. Because the City of Calexico determines the size of the fire protection force in relation to population (i.e. 1.5 firefighters per 1,000 residents), there would be no increase in demand for fire personnel.

The proposed Project involves construction on partially developed land within an industrial area. In compliance with City ordinances, the Applicants (Barrington Consulting, LLC; Calexico Distribution Company, LLC; Cole Boulevard Advisors, LLC; Desert Valley Partners, LLC; and Trinity 341, LLC) would be required to pay the Development Impact Fee which is considered mitigation for the Project's fair share of impacts to fire protection services. Thus, any costs to the City from needed expansions or additions to the City's fire protection service brought about by the proposed Project would be mitigated by this fee.

In addition, each Applicant has prepared a Fire Emergency Plan which provides worker safety protocols and would be a component of the Prevention & Incident/Emergency Response Plan. In the event of a fire, the Fire Emergency Plan identifies management and staff roles and the logical sequence of events to keep all employees safe. A fire hydrant is also located adjacent to West Cole Boulevard just south of proposed Parcel 3 (APN 059-343-016). The Project would be required to have a sprinkler system and fire alarm system in each structure. As part of the Project's design review, the CFD would have input on the following:

- Fire Sprinkler System Approval;
- Site Plan Approval;
- Building Permits; and
- Occupancy Permits.

Given the proximity of the Project parcels to Fire Station No. 2, the location an existing fire hydrant just south of proposed Parcel 3, and the proposed fire safety features (sprinklers and Fire Emergency Plan) that would be required by the CFD, there would not be a need for new or altered fire facilities. The CFD has had several employment separations and retirements. Once those positions are filled the CFD would be able to provide fire protection without any additional staff or facilities. The proposed Project will not affect the CFDs ability to provide Fire/EMS protection to other customers in the area (Favila pers. comm. 2018b). Thus, impacts to City of Calexico fire services are considered **less than significant**.

Mitigation Measures

None required.

Significance After Mitigation

None.

4.10.1.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The cumulative setting for fire protection service is the service area of the City of Calexico. A cumulative list of large scale proposed, approved and reasonably foreseeable projects within the City of Calexico is shown in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used. Of the six proposed, approved and reasonably foreseeable projects; the first phase of the Calexico Gran Plaza has been built and the second phase of development is on hold at the developer's request and it is unknown at this time when the second phase will commence. It is unlikely that the second phase will be in operation by the time the Trinity project is approved. The Las Palmas Mobile Home Park, an approximately

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73-acre mixed-use development including 466 lots consisting of 330 single-family residential manufactured units and 136 RV spaces, has been approved and is currently under construction. The Calexico West Land Port of Entry is currently under construction. The Towne Center and Calexico Mega Park projects has been approved but not constructed. The remaining project is still in process but has not yet been approved.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

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**.

The proposed Project, in combination with the other proposed, approved and reasonably foreseeable projects in the City of Calexico identified in Table 3.0-1 Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used, would increase demand on existing fire facilities, equipment, and staffing. Of the six proposed, approved and reasonably foreseeable projects only the El Portal and the Las Palmas projects are residential. If approved, both would result in increases in population which would result in a need for additional firefighters since the size of the fire protection force is directly related to population (i.e. 1.5 firefighters per 1,000 residents). Development of these two projects would result in the need for additional CFD staff.

All new developments, including the projects listed in Table 3.0-1, in the City of Calexico are required to meet the 2016 CFC and the City's Fire Prevention Code. All of these projects are also required to pay Development Impact Fees to offset the demand for increased fire services. Furthermore, impacts to fire protection for all of these projects are mitigated on a project-by-project basis through review of individual projects by the CFD to ensure that all fire safety requirements (fire sprinklers, fire water pressure) are satisfied. The CFD has confirmed the Project would not result in cumulative effects to fire services (Favila pers. comm. 2018b). Thus, the Project's contribution to cumulative impacts to fire protection would be **less than cumulatively considerable**. Likewise, because individual projects are required to meet all applicable federal, state and local requirements, as applicable, cumulative impacts to the CFD would be **less than cumulatively considerable**.

Mitigation Measures

None required.

Significance After Mitigation

Not required.

4.10.2 LAW ENFORCEMENT

4.10.2.1 REGULATORY FRAMEWORK

A. STATE

Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA)

The Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) was passed in 2017 and created the general framework for the regulation of commercial medicinal and adult-use cannabis in

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California. It requires the protection of the public to be the highest priority for a licensing authority in exercising its licensing, regulatory, and disciplinary functions under MAUCRSA, and would require the protection of the public to be paramount whenever the protection of the public is inconsistent with other interests sought to be promoted. This act requires development of a security protocol for cannabis cultivation facilities such as the proposed Project. A Security and Control Plan as well as a Business Emergency Response Plan has been developed for each of the five applications submitted in association with the Trinity Cannabis Cultivation and Manufacturing Facility.

B. LOCAL

City of Calexico General Plan

The Public Facilities/Services Element is not one of the state-required elements for including in the General Plan. Nevertheless, the City of Calexico has included this element to address sewer facilities, water systems, and storm drain facilities. It also addresses public services including police and fire. A key component of the discussion and policies is the implementation of mechanism to finance required capital improvements (City of Calexico 2007, p. 4-1). Calexico’s current General Plan dated February 2007 was adopted by the City on May 1, 2007.

Table 4.10-2 provides a consistency analysis of the applicable City General Plan goals and objectives as they relate to the proposed Project. While this EIR analyzes the Project’s consistency with the General Plan pursuant to State CEQA Guidelines Section 15125(d), the Calexico City Council ultimately determines consistency with the General Plan.

**TABLE 4.10-2
CITY OF CALEXICO GENERAL PLAN CONSISTENCY ANALYSIS – LAW ENFORCEMENT**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
PUBLIC FACILITIES SERVICES ELEMENT		
4.4.1 Goal To provide a full range of the necessary public facilities and services that are convenient to users, economical and reinforce a quality city identity.		
4.4.1.9 Police Protection		
Objective 9: To protect the lives, health, and property of all residents, businesses, and visitors to Calexico through adequate levels of law enforcement service.		
Policy 9a: Police staffing and facilities shall be expanded commensurably to accommodate the needs of Calexico’s growing population.	Yes	The proposed Project would not increase the population requiring expansion of police staffing and facilities. Therefore, the proposed Project is consistent with this policy.
Policy 9b: Require new development projects to pay fees proportional to their demand for police services.	Yes	The City has adopted a Development Impact Fee schedule for residential, commercial and industrial projects. Industrial projects would be required to pay \$21,730.00 in fees per acre (Alvarado pers. comm. 2018c). The proposed Project would pay the required Development Impact Fee and is therefore consistent with this policy.

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**TABLE 4.10-2
CITY OF CALEXICO GENERAL PLAN CONSISTENCY ANALYSIS – LAW ENFORCEMENT**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
<p>Policy 9e: Achieve and maintain the industry standard ratio of 2 police officers per 1,000 residents.</p>	<p align="center">No</p>	<p>The City of Calexico is currently not meeting the minimum acceptable ratio of 2 officers per 1,000 residents. While the proposed Project would not increase the number of residents further exacerbating the shortfall in police officers, the City is nevertheless below its standard.</p>

City of Calexico Service Area Plan (2006)

The City of Calexico has established criteria that must be met to ensure that adequate law enforcement services are provided. The Police Department and the City have a goal of 2.0 officers per 1,000 residents with a minimum acceptable ratio of 1.5 officers per 1,000 residents (City of Calexico 2006, p. 7-2). The City’s General Plan (City of Calexico 2007, p. 4-16) has a policy to achieve and maintain the industry standard ratio of 2 police officers per 1,000 residents. The SAP also provides mitigation recommendations to achieve these goals. These include (City of Calexico 2006, p. 7-4):

- III. B. The City shall require new development projects to pay fees proportional to their demand for police services.
- III. F. The City Planning Department shall regularly update the police department on new development so that the fire department may evaluate their ability to support said projects.
- III. G. The City shall enforce Calexico City Ordinance 890 Section 1 which imposes development impact fees prior to the issuance of building permits for new development where the City has discretionary authority to ensure that new development pays it’s “fair share” of expanded or new Law enforcement facilities and services. All fees collected and any interest accrued pursuant to Ordinance 890 Section 1 shall be used by the City for the purposes of providing capital facilities and equipment, including station construction, station expansion, and police vehicles and police apparatus. Until Ordinance 890 Section 1 is updated, which is underway, and will be completed upon adoption of this SAP, conditions of project approval shall address fee short falls to assure adequate police services and facilities funding.

The 2006 SAP is in the process of being updated. Since publication of the 2006 SAP, the City has adopted a Development Impact Fee schedule for residential, commercial and industrial projects in Chapter 3.32 of the Municipal Code (Ordinance 1036). Industrial projects would be required to pay \$21,730.00 in fees per acre (Alvarado, pers. comm., 2018c). The proposed Project would be required to pay approximately \$183,401.20 (8.44 acres x \$21,730.00).

4.10.2.2 EXISTING SETTING

The Calexico Police Department (CPD) is the largest General Fund Department in the City. It employs 37 sworn and civilian personnel. Currently, the CPD is staffed with 22 sworn police officers, six 911 public safety dispatchers, two full-time and four temporary records clerks, two animal control officers, and one evidence technician (Gerardo, pers. comm., 2018). The CPD provides the following services:

- Patrol Functions
- General Investigations
- Parking/Meter Enforcement
- Animal Control Services

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- Records Report Services
- Live Scan/Fingerprint Services
- Dispatch Services (Police, Fire, EMS);
- Police Reserve Officers
- Police Explorer Program

The CPD currently has a staffing ratio of approximately .512 officers per 1,000 residents (Gerardo, pers. comm., 2018). This is well below the minimum acceptable ratio of 1.5 officers per 1,000 residents. The City is in the process of hiring more officers and staff.

The CPD has four stations located throughout the City. The locations are summarized below and depicted in **Figure 4.10-1**:

- 420 East 5th Street (main station)
- Nosotros Park (substation)
- International Park (substation)
- Near Meadows Avenue north of SR-98 (substation)

The Nosotros Park Substation is the closest police facility to the proposed Project (approximately 1.5 miles to the south).

4.10.2.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the CEQA Guidelines Appendix G thresholds of significance. The project would have a significant impact on law enforcement services if it would:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered law enforcement facilities, or the need for new or physically altered law enforcement, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for law enforcement.

B. METHODOLOGY

The evaluation of potential impacts to law enforcement associated with construction and operation of the proposed Project was based on review of the Project parcels and existing building at 2421 Enterprise Boulevard and the surrounding area. The Security Control Plan and Emergency Response Plan, along with a series of questions regarding law enforcement service was also submitted to Interim Police Chief Gonzalo C. Gerardo for review and input.

C. PROJECT IMPACTS AND MITIGATION MEASURES

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**.

As a cannabis cultivation and manufacturing facility, the proposed Project will not cause direct or indirect population growth. The City of Calexico has policy guidelines for the expansion of the police force based on the ratio of police officers to population (standard ratio of 2 police officers per 1,000 residents;

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minimum ratio of 1.5 police officers per 1,000 residents). Because the proposed Project would not result in an increase in population, the City would not be forced to expand law enforcement.

The Project is located in an Industrial area approximately 1.5 miles from a Police Station. Due to the nature of this facility and the value of its product, the potential for theft is high. Each Applicant (Barrington Consulting, LLC; Calexico Distribution Company, LLC; Cole Boulevard Advisors, LLC; Desert Valley Partners, LLC; and Trinity 341, LLC) has prepared a Security and Control Plan to address anticipated threats from every conceivable arena including but not limited to physical, cyber, and procedural security for all facilities and operations. The Plan for each facility and the Transportation and Distribution Facility has been designed to give managers and employees the responsibility of ensuring, and working within, a secure environment. The Plan would discuss security technology that will be used at each cultivation and manufacturing facility as well as the transportation office. This would include facility cameras, cultivation cameras, perimeter fencing and walls, lighting, intercom, building access control and contactless smart card readers. Cannabis tracking would also be employed using “Agrisoft” Seed to Sale software. The software provides tools for marijuana-related businesses need for cannabis tracking and cannabis compliance. As part of the Plan the proposed Project would have armed, onsite security (Security and Control Plan 2017).

The proposed Project would also involve installation of security fencing and lighting around the entire perimeter. 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 (Security and Control Plan 2017).

In compliance with City ordinances, the Applicants would be required to pay the Development Impact Fee which is considered to mitigate the Project’s fair share of impacts to law enforcement services. Thus, any costs to the City from needed expansions or additions to the City’s law enforcement service brought about by the proposed project would be mitigated by this fee.

Given the proximity of the proposed Project area to an existing police station, the preparation of a Security and Control Plan, and the installation of dedicated security fencing and lights, and fees to cover any expansions or additions to the City’s law enforcement service brought about by the proposed Project, impacts to law enforcement services are considered **less than significant**.

Mitigation Measures

None required.

Significance After Mitigation

None.

4.10.2.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The cumulative setting for law enforcement is the service area of the City of Calexico Police Department. A cumulative list of large scale proposed, approved and reasonably foreseeable projects within the City of Calexico is shown in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used. Of the six proposed, approved and reasonably foreseeable projects; the first phase of the Calexico Gran Plaza has been built and the second phase of development is on hold at the developer’s request and it is unknown at this time when the second phase will commence. It is unlikely that the second phase will be in operation by the time the Trinity project is approved. The Las Palmas Mobile Home Park, an approximately 73-acre mixed-use development including 466 lots consisting of 330 single-family

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residential manufactured units and 136 RV spaces, has been approved and is currently under construction. The Calexico West Land Port of Entry is currently under construction. The Towne Center and Calexico Mega Park projects has been approved but not constructed. The remaining projects is still in process but has not yet been approved.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

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**.

The proposed Project, in combination with the other proposed, approved and reasonably foreseeable projects in the City of Calexico identified in Table 3.0-1 Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used, would increase demand on existing police facilities, equipment, and staffing during Project construction and operation. Of the six proposed, approved and reasonably foreseeable projects only the El Portal and the Las Palmas projects are residential. If approved, both would result in increases in population which would result in a need for additional police officers since the size of the police force is directly related to population (i.e. standard ratio of 2 police officers per 1,000 residents; minimum ratio of 1.5 police officers per 1,000 residents). Development of these two projects would not result in the need for additional CPD staff.

The proposed Project would incorporate security measures including a Security and Control Plan, dedicated security fencing and lighting, and armed on-site security. Furthermore, impacts to law enforcement are mitigated on a project-by-project basis through review of individual projects by the CPD to ensure that all potential security issues are addressed. In addition, all projects are required to pay the Development Impact Fee which is considered to each project's fair share of impacts to law enforcement services. Thus, the Project's contribution to cumulative impacts to law enforcement would be **less than cumulatively considerable** during Project construction and operation. Likewise, because individual projects are required to meet all applicable federal, state and local requirements, as applicable, cumulative impacts to the CPD would be considered **less than cumulatively considerable**.

Mitigation Measures

None required.

Significance After Mitigation

None.

4.10.3 WATER SERVICE

4.10.3.1 REGULATORY FRAMEWORK

A. STATE

Urban Water Management Planning Act - Assembly Bill (AB) 797

The Urban Water Management Planning Act was established by Assembly Bill 797 (AB 797) on September 21, 1983. This law evidences recognition by state legislators of water as a limited resource. AB 797 is also a declaration that efficient water use and conservation should be actively pursued throughout the state. AB 797 requires water suppliers providing water for municipal purposes, either directly or indirectly

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to more than 3,000 customers, or supplying more than 3,000 acre-feet per year (AFY) of water, to prepare and adopt a specific plan every five years. The purpose of the plan is to define the supplier’s current and future water use, sources of supply and supply reliability, and existing conservation measures. The City of Calexico has prepared an Urban Water Management Plan (UWMP) which the proposed Project would be required to adhere to the UWMP.

Senate Bill (SB) 610 and SB 221 and California Water Code

SB 610 and SB221 require submission of detailed water supply availability information. The California Water Code (CWC) describes the water supply assessment (WSA) that must be undertaken. CWC section 10912 identifies the types of projects that require preparation of a WSA. As it pertains to the proposed Project, CWC section 10912 states that a WSA is required for “A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sq. ft. of floor area.” The Project would occupy 8.44 acres of land and have 167,241 sq. ft. of floor space (inclusive of all four buildings, a 2,200-sq. ft. administration building, 323-sq. ft. guard house and 1.506-sq. ft. transportation office. Therefore, it would not meet the criteria for preparation of a WSA.

B. LOCAL

City of Calexico General Plan

The Conservation/Open Space Element addresses the identification, conservation, development and use of natural resources. These include, but are not limited to, development of farmland, flood control, water pollution, erosion, and endangered species.

The Public Facilities/Services Element is not one of the state-required elements for including in the General Plan. Nevertheless, the City of Calexico has included this element to address sewer facilities, water systems, and storm drain facilities. It also addresses public services including police and fire. A key component of the discussion and policies is the implementation of mechanism to finance required capital improvements (City of Calexico 2007, p. 4-1). Calexico’s current General Plan dated February 2007 was adopted by the City on May 1, 2007.

Table 4.10-3 analyzes the consistency of the Project with the applicable goals, objectives and policies relating to water in the City of Calexico General Plan. While this EIR analyzes the Project’s consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d), the Calexico City Council ultimately determines consistency with the General Plan.

**TABLE 4.10-3
CALEXICO GENERAL PLAN CONSISTENCY ANALYSIS – WATER SERVICES**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
CONSERVATION/OPEN SPACE ELEMENT		
5.4.1 Conservation Goal: To Balance development with the preservation and management of natural and human-built open space resources, thus ensuring the long-term viability of the City.		
5.4.1.1 Water Quality and Supply		
Objective 1: Water supply and water quality should be maintained by implementing domestic conservation measures and protecting surface waters.		
Policy 1c: The City shall continue to require the use of primarily drought-tolerant and/or native plants in new development through the review and	Yes	Three new cultivation and manufacturing facilities will be constructed on Parcels 1, 2 and 3. The City will review landscape plans prior to

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**TABLE 4.10-3
CALEXICO GENERAL PLAN CONSISTENCY ANALYSIS – WATER SERVICES**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
approval process by City staff. The use of turn grass for lawns should be limited.		approval to ensure that drought-tolerant and/or native plans are used. Therefore, the proposed Project is consistent with this policy.
Policy 1e: Promote water conservation, reduce urban runoff, and prevent groundwater contamination within development projects, property maintenance, City operations, and all other related activities requiring City discretionary approval.	Yes	The proposed Project promotes water conservation through the capture and recycling of approximately 70% of the water used in cultivation. In addition, installation a spill/fill catch basin for the on-site diesel generators is proposed to prevent possible runoff should a leak or spill occur when refueling (refer to MM 4.7.1 in Section 4.7 Hazards and Hazardous Materials). Therefore, the proposed Project is consistent with this policy.
Policy 1i: The usage of drip irrigation shall be required where feasible.	Yes	The Project will use drip irrigation. Therefore, the proposed Project is consistent with this policy.
PUBLIC FACILITIES/SERVICES ELEMENT		
Goal 4.4.1: To provide a full range of the necessary public facilities and services that are convenient to users, economical, and reinforce a quality City identity.		
4.4.1.3 Potable Water		
Objective 3: To provide high quality potable water services to existing residents as well as to accommodate future growth and development.		
Policy 3d: The City shall incorporate measures to promote the conservation of water in new and existing development, specifically best available technologies in new construction and site development, including, but not limited to, water-saving toilets, showerheads, faucets, and water conserving irrigation.	Yes	The proposed Project would install water-saving fixtures to conserve water. In addition, the cultivation process would employ water recycling of approximately 70%. Therefore, the proposed Project is consistent with this policy.

City of Calexico Service Area Plan (2006)

The City of Calexico has established criteria that must be met to ensure that adequate water supply and distribution services are provided. The SAP also provides mitigation recommendations to achieve these goals. These include (City of Calexico 2006, p. 11-4):

- III. F. The City should reevaluate their development impact fees (at least every five years).

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The 2006 SAP is in the process of being updated. Since publication of the 2006 SAP, the City has adopted a Development Impact Fee schedule for residential, commercial and industrial projects in Chapter 3.32 of the Municipal Code (Ordinance 1036). Industrial projects would be required to pay \$21,730.00 in fees per acre (Alvarado, pers. comm., 2018c). The proposed Project would be required to pay approximately \$183,401.20 (8.44 acres x \$21,730.00).

4.10.3.2 EXISTING SETTING

A. CITY WATER SYSTEM

Water Supply

Calexico provides potable water service to its residential, commercial and industrial customers within the City limits. The City treats water imported 80 miles from the Colorado River by the IID via the All American Canal near the Southern Pacific Railroad (City of Calexico 2018b). Due to IID's long-standing and ample water rights, there are no terms in place which limit the amount of water available to the City (except during severe droughts). As a result of this arrangement with IID, the City's production capacity is its only limitation (City of Calexico 2015f, p. 2-9).

Raw water is pumped from the All American Canal through a 42-inch pipeline to the City's 25 million gallon (MG) reservoir (City of Calexico 2018b). The total capacity of raw water that can be currently supplied to the City via the pipeline and storage tank system is 31.6 million gallons per day (MGD). The City pumps the raw water to its water treatment plant, located about one mile south of the raw water reservoir, via a 30-inch pipeline. The water treatment plant has a capacity of 15 MGD. The City has a shovel-ready project and funding in place to expand the plant to 20.0 MG per day (Dale pers. comm., 2018). After treatment, the City pumps the water into one of three storage tanks located in the City (City of Calexico 2015f; Falomir, pers. comm., 2018). Treated water is stored in three above-ground storage tanks that have a total storage capacity for finished water available for distribution of 16 MG (City of Calexico 2015f). The City's total storage capacity including the raw water reservoir is 41 MG. Average flows in summer are 9.2 MGD and 5 MGD in winter (Falomir, pers. comm., 2018). Peak demand is 9.5 MGD (Dale, pers. comm. 2018).

Water Distribution

The City has one finished water pump station at the water treatment plant which maintains water pressure in the City. The current flow rate of the finished water pump station is 18,000 gallons per minute (GPM) or 26 MGD (City of Calexico 2018g; Dale, pers. comm., 2018). Average flows in summer are 9.2 MGD and 5 MGD in winter (Falomir, pers. comm., 2018).

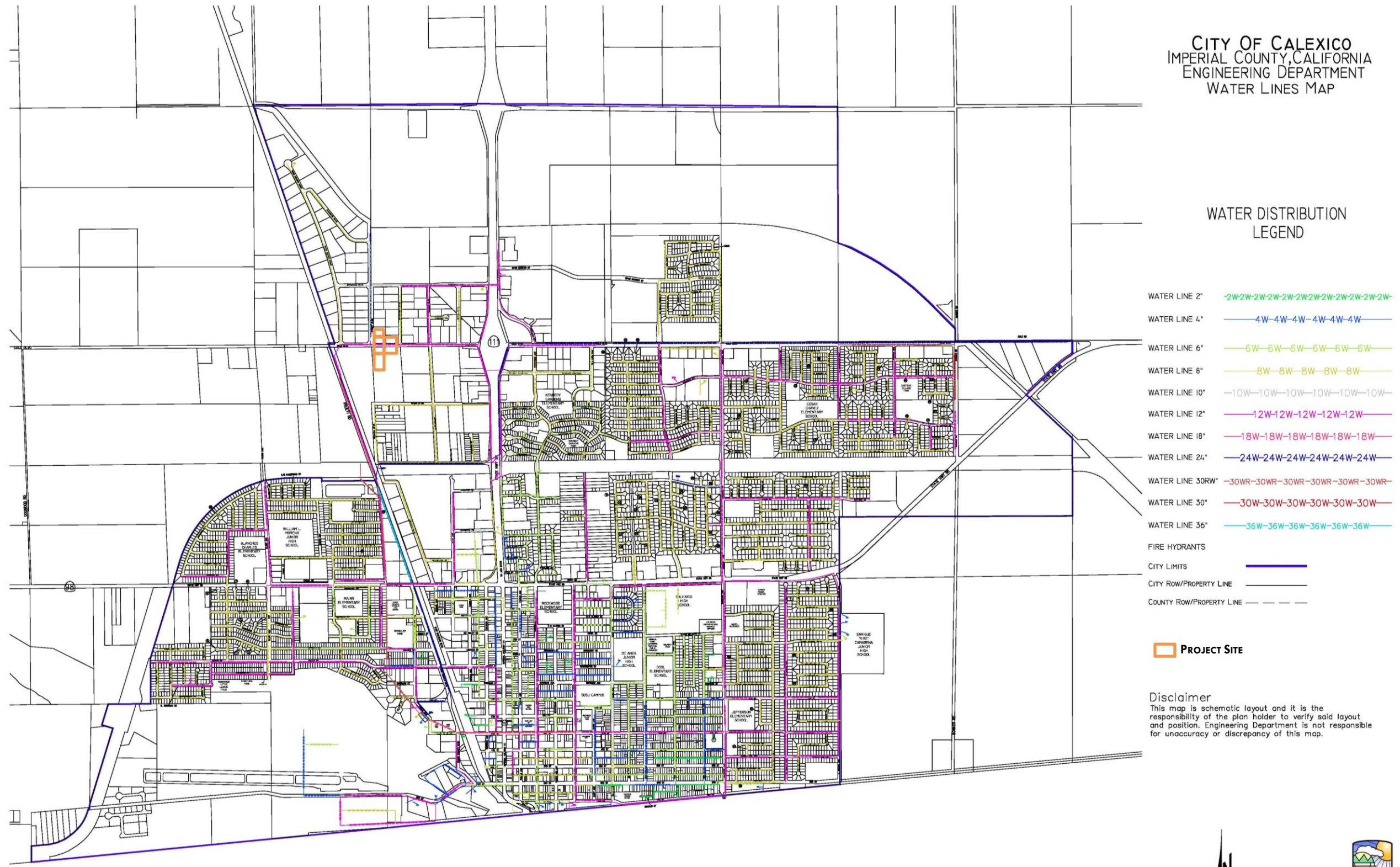
The present water system is operated in one pressure zone which is sustained by pumping only. Because the topography is flat throughout the City, there are no reservoirs in the system that can provide hydraulic gradient to sustain even the minimum pressures required by users. The existing water distribution system includes over 75 miles of pipelines ranging from two inches to 30 inches in diameter (**Figure 4.10-2**) (City of Calexico 2018g).

B. PROJECT PARCELS

Water Distribution

The Project parcels are served by water distribution lines located in the surrounding roadways (**Figure 4.10-3**). A 12-inch pipeline is located within West Cole Boulevard; a 10-inch and a 24-inch water pipeline are located in Sunset Boulevard; and an 8-inch water pipeline is located in Enterprise Boulevard (City of Calexico 2015d).

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Source: City of Calexico 2015d.

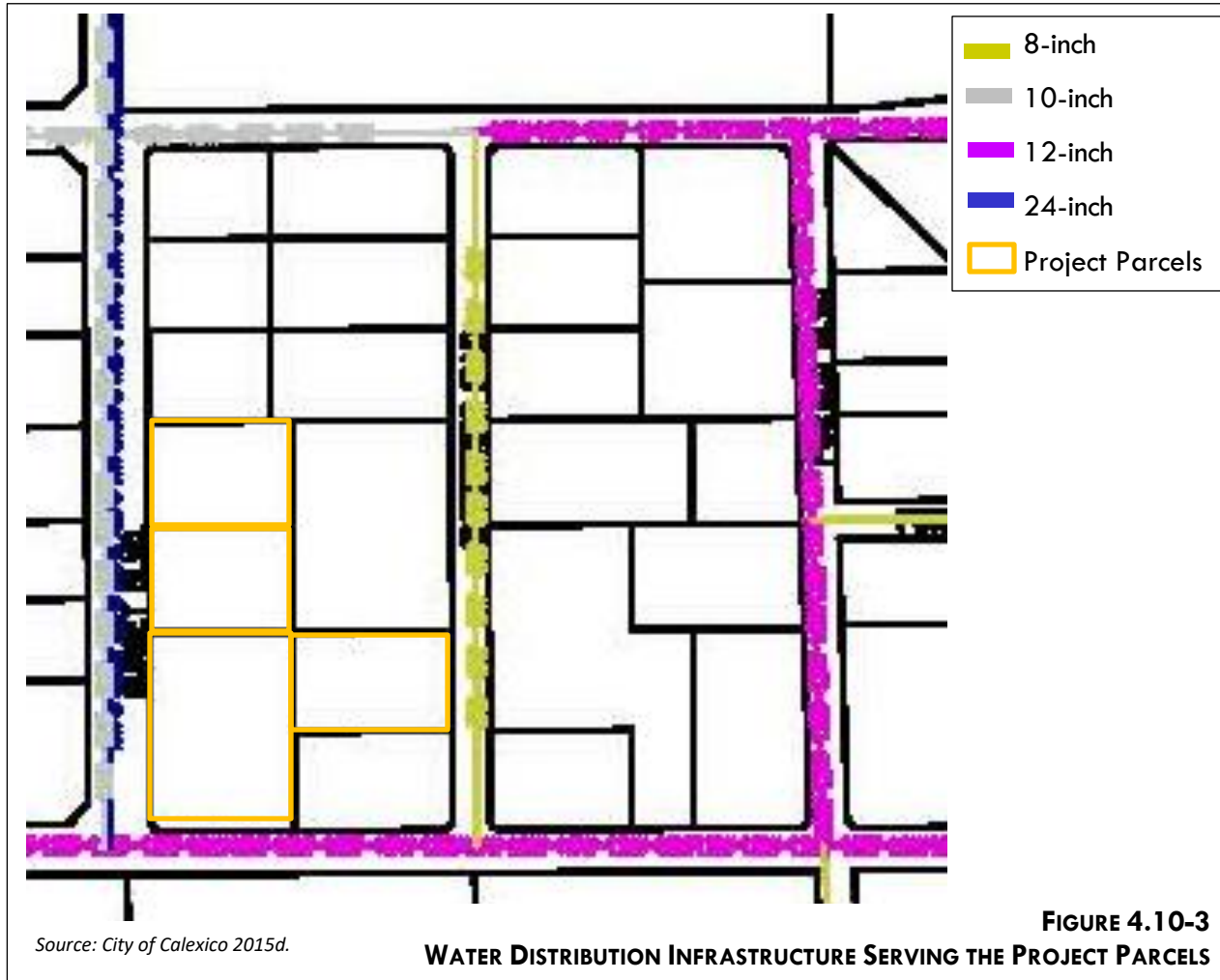
JANUARY 2015

GRAPHIC SCALE
0' 450' 900' 1800'

SCALE: 1"=900'

FIGURE 4.10-2
CITY OF CALEXICO WATER DISTRIBUTION SYSTEM

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Water Supply

As discussed under item A. City Water System, Water Supply, above, sufficient water supply capacity to the City is available from the IID. The only limiting factor is treatment capacity. However, the City currently has remaining capacity and is planning to expand the water treatment capacity an additional 5 MGD bringing capacity from 15 MGD to 20 MGD. Thus, water is available to serve the proposed Project parcels and 2421 Enterprise Boulevard.

4.10.3.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the following CEQA Guidelines Appendix G thresholds of significance. The project would have a significant impact with regard to water if it would:

- a) Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects;
- b) Not have sufficient water supplies available to serve the project from existing entitlements and resources, or if new or expanded entitlements are needed; or

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- c) Substantially degrade groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

B. METHODOLOGY

Evaluation of potential water supply and service impacts of the proposed Project were based on correspondence with the Applicant and an analysis of the City of Calexico's water supply.

C. ISSUES SCOPED OUT AS PART OF THE INITIAL STUDY

Criteria "a" was eliminated from further evaluation as part of the Initial Study Checklist because construction of new water treatment facilities or expansion of existing facilities is not required as part of this project. Criteria "c" was eliminated from further evaluation because groundwater is not being used as part of this project.

D. PROJECT IMPACTS AND MITIGATION MEASURES

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**.

Construction

It is estimated that up to 8,000 gallons of water per day (GPD) would be used for grading and dust control. The 8,000 gallons would be needed only during the two-month period when grading is being conducted for each new building (Leon, pers. comm., 2018c). Assuming that during a two-month period there would be only 40 work days (based on a 5-day work week), each building would require 320,000 gallons of water during the entire construction period. In total, 960,000 gallons would be used in construction for development of Parcels 1, 2 and 3.

Water for construction and dust control would be obtained from the City of Calexico. As a result of this arrangement with IID, the City's production capacity is its only limitation of water supply. The City can store up to 16 MG of treated water at any one time and can deliver 18,000 GPM. Average flows in summer are 9.2 MGD and 5 MGD in winter (Falomir, pers. comm., 2018). The amount of water required for construction would raise the average flow less than 0.1 MGD. Therefore, impacts associated with construction water demand are considered **less than significant**.

Operation

The proposed Project is estimated to use 5,171 GPD per building for cultivation, without taking into account 70% water capture and recycling. A wastewater reclamation system would be included as part of the Project. When processed through the reclamation system, up to a 1:4 waste to product water ratio can be achieved. The system has been designed to include a discharge tank sized at 1,050 gallons. Concentrated wastewater comes from the nutrient runoff from the benches, as well as the reverse osmosis concentrate streams from both RO water makers. Ultimately recapture and reclamation would result in a net usage input from the City of Calexico of 1,071 GPD per each cultivation and manufacturing facility (Irwin, pers. comm., 2018b). A total water demand of 4,284 GPD would be required for all four cultivation and manufacturing facilities. Water for sinks, toilets and showers is estimated at 17 GPD per

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employee (Leon, pers. comm., 2018c). Based on 78 employees for the entire Project, an additional 1,326 GPD of water would be needed. Lastly, the transportation office would have a water demand of 45 GPD (Irwin, pers. comm., 2018b). In total, the proposed Project would use 5,655 GPD.

As discussed above, the City's production capacity is its only limitation of water supply. The City can store up to 16 MG of treated water at any one time and can deliver 18,000 GPM. Average flows in summer are 9.2 MGD and 5 MGD in winter (Falomir, pers. comm., 2018). The Project area (i.e. the Portico Industrial Park) is already served by several water lines. The amount of water required for operation would raise the average flow less than 0.1 MGD. Therefore, operational water demand would be **less than significant**. The Fire Chief has also indicated there is adequate fire flows in the area (Favila, pers. comm., 2018a). The proposed Project would not exceed the capacity of the existing water distribution system during construction or operation, nor result in the need for new water entitlements. Therefore, impacts associated with water distribution and supply are considered **less than significant**.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

4.10.3.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The cumulative setting and geographic scope for water supply is the service area for the City of Calexico Public Works Department. A cumulative list of proposed, approved and reasonably foreseeable projects within the City of Calexico is shown in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used. Of the six proposed, approved and reasonably foreseeable projects; the first phase of the Calexico Gran Plaza has been built and the second phase of development is on hold at the developer's request. It is unknown at this time when the second phase will commence. It is unlikely that the second phase will be in operation by the time the Trinity project is approved. The Las Palmas Mobile Home Park, an approximately 73-acre mixed-use development including 466 lots consisting of 330 single-family residential manufactured units and 136 RV spaces, has been approved and is currently under construction. The Calexico West Land Port of Entry is currently under construction. The Towne Center and Calexico Mega Park projects has been approved but not constructed. The remaining projects is still in process but has not yet been approved.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

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**.

The Calexico West Land Port of Entry has been funded for construction in 2018 and would expand the current facility to approximately 16 acres. The City of Calexico Mega Park is a 157-acre mixed used commercial development that has been approved and construction can begin at any time.

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The Las Palmas Mobile Home Park, an approximately 73-acre mixed-use development including 466 lots consisting of 330 single-family residential manufactured units and 136 RV spaces, has been approved and is currently under construction. The El Portal Subdivision is a 157-acre residential subdivision which is also undergoing environmental review. The Town Center Industrial Park is a 133-acre industrial development that has been approved but not constructed.

The first phase of the Calexico Gran Plaza has been built and the second phase of development is on hold at the developer's request and it is unknown at this time when the second phase will commence. It is unlikely that the second phase will be in operation by the time the Trinity project is approved. Thus, Calexico Gran Plaza is past the construction period and would not be using water for construction. Also, Calexico Gran Plaza's operational water use is currently being met by the City of Calexico and represents the existing condition for water use.

Table 4.10-4 summarizes estimated operational water demand associated with cumulative projects.

**TABLE 4.10-4
ESTIMATED CUMULATIVE PROJECTS' OPERATIONAL WATER DEMAND**

Project	Size (acres)	Annualized Water Use (MG)	Average water use (GPD)
Proposed Project	8	2.1	5,655
Calexico West Land Port of Entry	16	10.5	28,800
Calexico Mega Park	157	70.8	194,000
El Portal Subdivision	157	301.8	827,000
Town Center Industrial Park	133	72.3	199,500
Las Palmas	73	115.0	315,500
Total Operational Water Use	746	572.5	1.6 MGD

See Appendix I for calculations and sources.

Assuming the proposed Project is operated concurrent with the new Calexico West Land Port of Entry, the Calexico Mega Park, the Town Center Industrial Park, the El Portal Subdivision and the Las Palmas Mobile Home Park, cumulative water use would be approximately 1.6 MGD. Detailed calculations are available in **Appendix I** of this EIR.

The cumulative projects' operational water demand of 1.6 MGD would raise the daily water consumption in the City of Calexico. However, even during the summer period when average flows are 9.2 MGD this would only raise the level to 10.8 MGD which is well below the City's capacity to produce water at 14 MGD.

Thus, neither construction nor operational water demand, when considered for cumulative projects, would not exceed the capacity of the existing water distribution system nor result in the need for new water supply entitlements. Therefore, cumulative operational water supply and distribution impacts are considered **less than cumulatively considerable**. In addition, the proposed Project's contribution to cumulative operational water demand is **less than cumulatively considerable**.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

4.10.4 WASTEWATER SERVICE

4.10.4.1 REGULATORY FRAMEWORK

A. FEDERAL

Clean Water Act

The Clean Water Act (CWA) was adopted in 1972 to protect the waters of the nation. The United States Environmental Protection Agency (EPA) and corresponding state agencies regulate public wastewater systems to ensure compliance with the CWA. The National Pollutant Discharge Elimination System (NPDES) Permit Program was instituted to implement the CWA regulatory standards. All point sources (e.g. a discreet conveyance such as a pipe or ditch) discharging pollutants into waters of the United States are required to obtain an NPDES permit under the CWA. Facilities discharging directly to surface waters must obtain an NPDES permit. The proposed Project will require an NPDES permit in association with both construction and operation. The NPDES permit is described in further detail in Section 4.8, Hydrology and Water Quality, under the Federal and State Regulatory Framework.

B. STATE

State Water Resources Control Board

The SWRCB has dual authority to allocate and protect water. This two-fold responsibility enables the SWRCB to provide comprehensive protection for California’s waters. Nine RWQCBs dispersed throughout California carry out the duties of the SWRCB. The RWQCBs develop and enforce water quality objectives and implementation plans that will best protect the beneficial uses of the state’s waters.

The proposed Project is within the jurisdiction of the Colorado River Basin Regional Water Quality Control Board (CRBRWQCB), Region 7. CRBRWQCB regulates the discharge of waste to surface waters (rivers, streams, lakes, wetlands, and the Pacific Ocean) as well as to storm drains, to the ground surface, and to groundwater. The proposed Project would discharge to the IID’s canal system via the Stout Drain.

C. LOCAL

City of Calexico General Plan

The Public Facilities/Services Element is not one of the state-required elements for including in the General Plan. Nevertheless, the City of Calexico has included this element to address sewer facilities, water systems, and storm drain facilities. It also addresses public services including police and fire. A key component of the discussion and policies is the implementation of mechanism to finance required capital improvements (City of Calexico 2007, p. 4-1). Calexico’s current General Plan dated February 2007 was adopted by the City on May 1, 2007.

Table 4.10-5 analyzes the consistency of the Project with the applicable goals, objectives and policies relating to wastewater in the City of Calexico General Plan. While this EIR analyzes the Project’s consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d), the Calexico City Council ultimately determines consistency with the General Plan.

**TABLE 4.10-5
CITY OF CALEXICO GENERAL PLAN CONSISTENCY ANALYSIS – WASTEWATER SERVICE**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
Public Facilities/Services Element		
4.4.1.2 Sewers		
Objective 2: To provide high quality sewage services to existing residents as well as to accommodate future growth and development.		

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**TABLE 4.10-5
CITY OF CALEXICO GENERAL PLAN CONSISTENCY ANALYSIS – WASTEWATER SERVICE**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
<p>Policy 2f: All improvements to the existing sewer system necessitated by the approval of a new development project shall be financed entirely by the proponent either by fee or actual construction.</p>	<p align="center">Yes</p>	<p>Adequate wastewater conveyance capacity is available to serve the proposed Project. However, lift stations #9 and #11 will need to be upgraded to be able to accommodate increased flows from cumulative development. Cost sharing mechanisms are in place for the existing infrastructure. The fees for upgrading these pump stations and cost sharing will need to be worked out between the Applicant and the Planning and Engineering Departments (Dale, pers. comm., 2018). The Applicants will participate in the cost sharing if required. Therefore, the proposed Project is consistent with this policy.</p>

City of Calexico Service Area Plan (2006)

The City of Calexico has established criteria that must be met to ensure that adequate wastewater services are provided. The Service Area Plan (SAP) also provides mitigation recommendations to achieve these goals. These include (City of Calexico 2006, p. 10-6):

- III. F. The City should reevaluate their development impact fees (at least every five years).

The 2006 SAP is in the process of being updated. Since publication of the 2006 SAP, the City has adopted a Development Impact Fee schedule for residential, commercial and industrial projects in Chapter 3.32 of the Municipal Code (Ordinance 1036). Industrial projects would be required to pay \$21,730.00 in fees per acre (Alvarado, pers. comm., 2018c). The proposed Project would be required to pay approximately \$183,401.20 (8.44 acres x \$21,730.00).

4.10.4.2 EXISTING SETTING

A. CITY COLLECTION SYSTEM

Calexico operates its own wastewater collection and treatment system. The current wastewater collection system consists of pipes ranging in size from six inches to 30 inches in diameter (**Figure 4.10-4**). Lateral and truck, sewer lines discharge into one of two major interceptor sewer mains. The South Interceptor Sewer main primarily serves east of the Southern Pacific Railroad and south of Highway 98. Wastewater flows from the north and west portions of the City discharge into the North Interceptor Sewer Mains (City of Calexico 2015a).

Due to the flat topography, most of the sewer lines have been constructed at minimum slopes and the interceptors are relatively deep, some as much as 20 feet. A series of small pump stations have also been constructed to provide service to new developments (City of Calexico 2015a). The wastewater treatment plant (WWTP) is located in the southwest part of the City. The WWTP is bound by the Calexico International Airport to the south and the New River to the north. Treatment effluent is discharged to the New River. The plant uses activated sludge technology and has a plant capacity of 4.3 MGD. The City operates currently with an ADF of 2.3 MGD. Remaining capacity is 47 percent (City of Calexico 2015a;

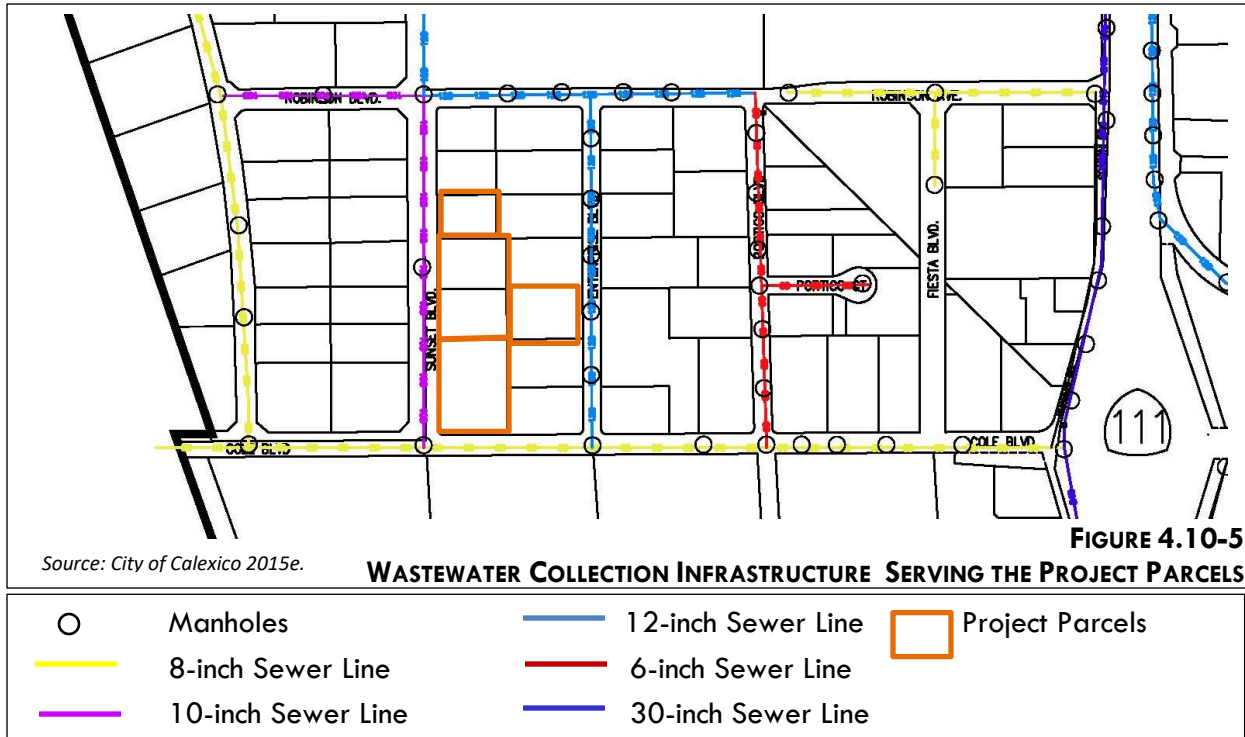
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Falomir, pers. comm., 2018). The process consists of a head works structure, primary clarifier, aeration tanks, secondary clarifiers and sludge drying beds (City of Calexico 2015a). Pending approval of the new rates, the City will be embarking on a new Wastewater Treatment Plant Improvement Project that will bring the capacity to 5.8 MGD (Dale, pers. comm., 2018).

The project Parcels are served by an 8-inch sewer line located in West Cole Boulevard, a 12-inch sewer line in Enterprise Boulevard and a 10-inch sewer line in Sunset Boulevard (City of Calexico 2015e).

B. PROJECT PARCELS

The Project site is serviced by several sewer lines (Figure 4.10-5).



4.10.4.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the following CEQA Guidelines Appendix G thresholds of significance. The Project would have a significant impact to wastewater if it would:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity within the collection system to serve the project's projected demand in addition to the provider's existing commitments; or
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

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CITY OF CALEXICO
IMPERIAL COUNTY, CALIFORNIA
ENGINEERING DEPARTMENT
SEWER LINES MAP

SEWER DISTRIBUTION
LEGEND

LEGEND
CITY LIMITS
USA BORDER LINE
CITY ROW/PROPERTY LINE

- STREET NAMES**
- | | | | |
|------------------------|--------------------|------------------------|------------------|
| 1 CRUZ R CONTRERAS CT | 1 SOBKE CT | 2 C. SANCHEZ CT | 3 SERENO DR |
| 2 MATILDE GOMEZ CT | 3 KEMPT CT | 3 RAB ROOD CT | 3 PERDIT CT |
| 3 TINA PADILLA CT | 3 HOSEA CT | 3 SUNSHINE DR | 3 VICTORIA DR |
| 3 BETTY BRANDENBERG CT | 3 FRONTIERA DR | 3 FRANCISCO MECOCHA ST | 3 MEADOW DRIVE |
| 3 A. HELLER CT | 3 VEREDA DR | 3 BOWSER AVE | 3 F. PEDROZA CT |
| 3 B. LUNA ST | 3 PORTON DR | 3 AIRROD AVE | 3 COOLIDGE CT |
| 3 M. FRISON ST | 3 JEAN ROBINSON CT | 3 RIO HONDO AVE | 3 ARTHUR CT |
| 3 D. MERCADO | 3 BROWN CT | 3 PASO DEL EMPERADOR | 3 FORD AVE |
| 3 HARLAN CT | 3 SANTIAGO DR | 3 PASO DE LOS VIRREYES | 3 FILMORE AVE |
| 3 GONZALES CT | 3 COLORADO DR | 3 DR. AJALAT AVE | 3 VAN BUREN AVE |
| 3 DUNBAR CT | 3 BRANCO DR | 3 A. CORCERO AVE | 3 TRUMAN CT |
| 3 ARMENDARIZ CT | 3 PLATA DR | 3 M. LEGASPI AVE | 3 A. TRAZADO AVE |
| 3 WARD CT | 3 POLKHOORN CT | 3 I. ROMERO CT | 3 R. SANTOS ST |



- MANHOLES**
- 4S — 4S — 4S — SEWER LINE 4"
 - 6S — 6S — 6S — SEWER LINE 6"
 - 8S — 8S — 8S — SEWER LINE 8"
 - 10S — 10S — 10S — SEWER LINE 10"
 - 12S — 12S — 12S — SEWER LINE 12"
 - 15S — 15S — 15S — SEWER LINE 15"
 - 18S — 18S — 18S — SEWER LINE 18"
 - 21S — 21S — 21S — SEWER LINE 21"
 - 24S — 24S — 24S — SEWER LINE 24"
 - 27S — 27S — 27S — SEWER LINE 27"
 - 30S — 30S — 30S — SEWER LINE 30"
- PROJECT PARCELS**

Disclaimer
This map is schematic layout and it is the responsibility of the plan holder to verify said layout and position. Engineering Department is not responsible for unaccuracy or discrepancy of this map.

JANUARY 2015

0' 400' 800' 1600'
SCALE: 1"=400'

Source: City of Calexico 2015e.

FIGURE 4.10-4
CITY OF CALEXICO WASTEWATER COLLECTION SYSTEM

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B. METHODOLOGY

Evaluation of potential wastewater impacts of the proposed Project were based on review of the City's wastewater collection maps, information provided by the Applicant, and correspondence with David Dale and Lily Falomir, City of Calexico Engineering Department.

C. ISSUES SCOPED OUT AS PART OF THE INITIAL STUDY

Criteria "a" was eliminated from further evaluation as part of the Initial Study Checklist because daily discharge water from benches is processed through a secondary filtration unit (called the reclamation system). When processed through the reclamation system, up to a 1:4 waste to product ratio can be achieved. This equates to approximately 315 gallons of concentrated waste stream being produced at each of the four cultivation and manufacturing facilities (1,260 GPD total). The system has been designed to include a discharge tank sized at 1,050 gallons with approximately three days capacity. The discharge tank is located outside of each cultivation and manufacturing facility building. The discharged water is free of any residue. A thermal evaporator would further reduce the concentrated (1:4 ratio) waste stream. The wastewater will be kept onsite and evaporated until a sludge is formed. The sludge would be trucked offsite and taken to an approved landfill in accordance with all laws deemed necessary through the Imperial County Department of Environmental Health and Safety and the City of Calexico.

The reclamation system also includes two 1,000-gallon condensate recapture tanks (stored water from the Heating, Ventilation, and Cooling [HVAC] system) in the East fertilization room, for a total of 3,000 gallons of condensate capture for each of the four cultivation and manufacturing facilities (12,000 gallons total). Each tank will have an overflow port which should be permanently connected to a floor drain or another type of drainage system. The water would not have to be filtered because it originates from the HVAC units and will never be in contact with the cannabis plants. With on-site reclamation and evaporation of the waste stream, the proposed Project is not anticipated to exceed wastewater treatment requirements of the RWQCB. Thus, no impact is identified for this issue area.

Criteria "b" was eliminated because construction of new wastewater treatment facilities or expansion of existing facilities is not required to accommodate the proposed project.

Criteria "d" was eliminated because a septic system is not proposed. The Project would receive wastewater treatment from the City of Calexico.

D. IMPACTS AND MITIGATION MEASURES

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**.

Each of the Project's 78 employees is estimated to generate 17 GPD of wastewater per day (17 x 78 = 1,326 GPD total). Each cultivation and manufacturing facility would generate approximately 71 GPD with all four generating 286 GPD (71 GPD x 4 = 286 GPD). In total the Project would generate 1,612 GPD of wastewater from both the cultivation and manufacturing process as well as employee wastewater. The amount of wastewater generated would be significantly less than the remaining capacity of the City of Calexico's WWTP which is approximately 2.0 MGD. Therefore, impacts to wastewater treatment and conveyance infrastructure are considered **less than significant**. However, lift stations #9 and #11 will need

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to be upgraded to be able to accommodate increased flows from cumulative development. According to the Public Works Manager, the proposed Project will be required to contribute to the fair share cost towards of upgrading lift station #11 only. The fair share cost is not known at this time (Alvarado, pers. comm., 2018).

Mitigation Measure

None required.

Significance After Mitigation

Not applicable.

4.10.4.4 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The cumulative setting and geographic scope for wastewater treatment and conveyance is the service area for the City of Calexico Public Works Department. A cumulative list of large scale proposed, approved and reasonably foreseeable renewable energy projects within the City of Calexico is shown in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used. Of the six proposed, approved and reasonably foreseeable projects; the first phase of the Calexico Gran Plaza has been built and the second phase of development is on hold at the developer's request. It is unknown at this time when the second phase will commence. It is unlikely that the second phase will be in operation by the time the Trinity project is approved. The Las Palmas Mobile Home Park, an approximately 73-acre mixed-use development including 466 lots consisting of 330 single-family residential manufactured units and 136 RV spaces, has been approved and is currently under construction. The Calexico West Land Port of Entry is currently under construction. The Towne Center and Calexico Mega Park projects has been approved but not constructed. The remaining projects is still in process but has not yet been approved.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

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**.

The first phase of the Calexico Gran Plaza has also been built a second phase of development is on hold at the developer's request and it is unknown at this time when the second phase will commence. It is unlikely that the second phase will be in operation by the time the Trinity project is approved. Thus, this project is past the construction period and its wastewater generation is accounted for in existing conditions.

The Calexico West Land Port of Entry has been funded for construction in 2018 and would expand the current facility to approximately 16 acres. The Calexico Mega Park is a 157-acre mixed used commercial development that has been approved and construction can begin at any time. The Town Center Industrial Park is a 133-acre industrial development that has been approved but not constructed. The Las Palmas Mobile Home Park, an approximately 73-acre mixed-use development including 466 lots consisting of 330 single-family residential manufactured units and 136 RV spaces, has been approved and is currently under

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construction. The El Portal Subdivision is a 157-acre residential development which is also undergoing environmental review.

Table 4.10-6 summarizes estimated operational wastewater generation associated with cumulative projects. Assuming the proposed Project is operated concurrent with the new Calexico West Land Port of Entry, the Calexico Mega Park, the Town Center Industrial Park, the El Portal Subdivision and the Las Palmas Mobile Home Park cumulative wastewater generation would be approximately 676,754 GPD or 0.7 MGD. Detailed calculations are available in **Appendix I** of this EIR.

**TABLE 4.10-6
ESTIMATED CUMULATIVE OPERATIONAL WASTEWATER GENERATION**

Project	Size (acres)	Average wastewater use (GPD)
Proposed Project	8	1,612
Calexico West Land Port of Entry	16	24,000
Calexico Mega Park	157	207,072
El Portal Subdivision	157	229,720
Las Palmas Mobile Home Park	73	54,750
Town Center Industrial Park	133	159,600
Total Operational Wastewater Generation	N/A	676,754

See Appendix I for calculations and sources.

As shown in **Table 4.10-6**, the operational wastewater generation of the cumulative projects would raise the daily wastewater generation in the City of Calexico approximately 0.7 MGD. However, the existing WWTP's capacity is 4.3 MGD. The City operates currently with an ADF of 2.3 MGD, thus the WWTP is operating at 53% of capacity. When combined, all of the cumulative projects would increase the ADF to approximately 3.0 MGD. This is approximately 1.3 MGD below the capacity of the WWTP. While there is adequate capacity at the WWTP, lift stations #9 and #11 would need to be upgraded to be able to handle the added flows from all of the cumulative projects. Therefore, cumulative impacts to wastewater treatment and conveyance infrastructure are considered **cumulatively considerable**. However, the Project's contribution to wastewater treatment is **less than cumulatively considerable** because adequate capacity is still available.

The City is currently planning to upgrade lift stations # 9 and #11 (Dale, pers. comm., 2018). In addition, a new WWTP improvement project is planned that will expand the capacity to 5.8 MGD. Upon completion of these improvements, cumulative impacts to wastewater treatment and conveyance infrastructure would be less than cumulatively considerable. Improvements would be funded through a cost sharing agreement between the City and the developer of each project.

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Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

4.10.5 SOLID WASTE

4.10.5.1 REGULATORY FRAMEWORK

A. LOCAL

City of Calexico General Plan

The Public Facilities/Services Element is not one of the state-required elements for including in the General Plan. Nevertheless, the City of Calexico has included this element to address sewer facilities, water systems, and storm drain facilities. It also addresses public services including police and fire. A key component of the discussion and policies is the implementation of mechanism to finance required capital improvements (City of Calexico 2007, p. 4-1). Calexico’s current General Plan dated February 2007 was adopted by the City on May 1, 2007.

Table 4.10-7 analyzes the consistency of the Project with the applicable goals, objectives and policies relating to solid waste in the City of Calexico General Plan. While this EIR analyzes the Project’s consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d), the Calexico City Council ultimately determines consistency with the General Plan.

**TABLE 4.10-7
CITY OF CALEXICO GENERAL PLAN CONSISTENCY ANALYSIS – SOLID WASTE**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
PUBLIC FACILITIES/SERVICES ELEMENT		
4.4.1.11 Solid Waste		
Objective 11: To maintain solid waste collection and disposal services in accordance with the California Integrated Waste Management Act of 1989 and pursue funding sources so as to reduce the cost of said services in the City.		
Policy 11c: Continue to administer existing recycling programs and enact new ones as necessary to achieve current 50% solid waste diversion goal as set forth by the California Integrated Waste Management Board.	Yes	The proposed Project is anticipated to implement recycling practices to reduce the amount of operational trash going to the local landfill. Residual waste from the proposed Project would be treated as agricultural waste and disposed of at a local landfill in accordance with required protocols. Therefore, the proposed Project is consistent with this policy.

4.10.5.2 EXISTING SETTING

Republic Services is the waste and landfill service provider for the City of Calexico. The Imperial Landfill accepts non-hazardous solid waste, construction demolition and inert (CDI) debris for recycling, as well as greenwaste (Calrecycle 2017).

4.10 PUBLIC SERVICES AND UTILITIES

As a permitted Solid Waste Facility, Allied Imperial Landfill is a Class II non-hazardous solid waste landfill that can collect up to 1,700 tons of non-hazardous solid waste and 350 tons of CDI (for recycling) per day. The landfill has a remaining capacity of approximately 15.4 million cubic yards (Calrecycle 2017).

4.10.5.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the CEQA Guidelines Appendix G thresholds of significance for Utilities and Service Systems criteria “f” and “g.” The Project would have a significant impact to solid waste if it would:

- f) Not be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; or
- g) Fail to comply with federal, state, and local statutes and regulations related to solid waste.

B. METHODOLOGY

Evaluation of potential solid waste impacts is based on information provided by the Applicant as well as information obtained from Allied Waste Services.

C. IMPACTS AND MITIGATION MEASURES

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.

The proposed Project would generate some trash from construction workers as well as construction waste (wood, packaging materials, etc.). 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. Waste from the cultivation process will be collected and properly managed and discharged with applicable methods in accordance with local, and State laws.

During operations, waste would be generated from the cultivation and manufacturing process. Fan leaves are non-producing growth leaves that have no useable value and contain little or no THC. They are processed throughout the growing cycle and removed as waste both throughout the cycle and during the harvest phase (Rhoades, pers. comm., 2018a).

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 would 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 (Rhoades, 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 like 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 plants lifecycle, the cubes are rinsed of any nutrients or fertilizers. The material is accepted at regular landfill sites because it is a natural gypsum rock compound that contributes to effective landfill specifications (Rhoades, pers. comm., 2018a).

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The Project would generate approximately 200 pounds a week of unusable leaf matter across all rooms and approximately 200 pounds of dry stem a week. There would be approximately 400 pounds of rockwool cubes each week (Rhoades, pers. comm., 2018a). In total the proposed Project would generate an estimated 800 pounds of waste per week. This is well below the landfill's permitted capacity of 1,200 tons of waste per day. Therefore, the proposed project would have a **less than significant impact** with regard to solid waste service and landfill capacity.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

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.

Waste handling methods would vary depending on the type of waste being managed. The four cultivation and manufacturing facilities would produce various material from the process that requires disposal. This includes "fan" leaves, "trim" and "rockwool cubes." Residual waste remaining after completion of cultivation ("fan" and "trim" material) is considered "waste biomass" that will be placed in a roll-off dumpster. The waste bio-mass will be void of psychoactive properties as well as any contaminants. The Applicant(s) will submit a "Special Waste Profile" to Republic Services. The waste bio-mass will be taken to the Imperial Landfill. Waste must remain in Imperial County. In addition, waste from the cultivation and manufacturing process cannot be transferred out of state (Leon, pers., comm., 2018b).

At the end of the plant's lifecycle, the rockwool 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.

The proposed Project would also be required to prepare a Certified Unified Program Agencies Hazardous Waste Business Plan for the California Department of Toxic Substances. Thus, a **less than significant impact** is identified with regard to compliance with federal, state and local statutes and regulations related to solid waste.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

4.10.5.4 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The geographic scope for the cumulative setting for solid waste pick-up and disposal is the service area of Republic Services within the City of Calexico and the Imperial Landfill. The Imperial Landfill is one of nine landfills in Imperial County. However, all solid waste from the City of Calexico is disposed of there. A cumulative list of proposed, approved and reasonably foreseeable projects within the City of Calexico is

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shown in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Used. Of the six proposed, approved and reasonably foreseeable projects; the first phase of the Calexico Gran Plaza has been built and the second phase of development is on hold at the developer’s request. It is unknown at this time when the second phase will commence. It is unlikely that the second phase will be in operation by the time the Trinity project is approved. The Las Palmas Mobile Home Park, an approximately 73-acre mixed-use development including 466 lots consisting of 330 single-family residential manufactured units and 136 RV spaces, has been approved and is currently under construction. The Calexico West Land Port of Entry is currently under construction. The Towne Center and Calexico Mega Park projects has been approved but not constructed. The remaining projects is still in process but has not yet been approved.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

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**.

The first phase of the Calexico Gran Plaza has also been built second phase of development is on hold at the developer’s request and it is unknown at this time when the second phase will commence. It is unlikely that the second phase will be in operation by the time the Trinity project is approved. Thus, this project is past the construction period and its wastewater generation is accounted for in existing conditions.

The Calexico West Land Port of Entry has been funded for construction in 2018 and would expand the current facility to approximately 16 acres. The Calexico Mega Park is a 157-acre mixed used commercial development that has been approved and construction can begin at any time. The Town Center Industrial Park is a 133-acre industrial development that has been approved but not constructed. The Las Palmas Mobile Home Park, an approximately 73-acre mixed-use development including 466 lots consisting of 330 single-family residential manufactured units and 136 RV spaces, has been approved and is currently under construction. The El Portal Subdivision is a 157-acre residential development which is also undergoing environmental review.

Table 4.10-8 summarizes estimated operational waste generation associated with cumulative projects. Assuming the proposed Project is operated concurrent with the new Calexico West Land Port of Entry, the Calexico Mega Park, the Town Center Industrial Park, the El Portal Subdivision and the Las Palmas Mobile Home Park cumulative waste generation would be approximately 37.29 tons per day. Detailed calculations are available in Appendix I of this EIR.

**TABLE 4.10-8
ESTIMATED CUMULATIVE PROJECTS’ OPERATIONAL WASTE GENERATION**

Project	Size (acres)	Average waste generation (tons per day)
Proposed Project	8	0.4
Town Center Industrial Park	133	5.8
Calexico West Land Port of Entry	16	10.7
Calexico Mega Park	157	7.5

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**TABLE 4.10-8
ESTIMATED CUMULATIVE PROJECTS' OPERATIONAL WASTE GENERATION**

Project	Size (acres)	Average waste generation (tons per day)
El Portal Subdivision	157	4.53
Las Palmas Mobile Home Park	73	2.8
Total Operational Waste Generation	NA	31.73

See Appendix I for calculations and sources.

Waste generated by the cumulative projects would raise the daily waste generation in the City of Calexico a total of 31.73 tons per day. However, the existing landfill's daily permit is 1,700 tons per day. The Imperial Landfill has a remaining capacity of 15.4 Million Cubic Yards. The proposed Project, when considered with the other cumulative projects, would not exceed the capacity of the existing landfill. Therefore, cumulative wastewater impacts are considered **less than cumulatively considerable**. Likewise, the Project's contribution to cumulative operational waste (0.4 tons per day) is **less than cumulatively considerable**.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.

4.10.6 ELECTRICITY

4.10.6.1 REGULATORY FRAMEWORK

A. LOCAL

Calexico General Plan

The Public Facilities/Services Element is not one of the state-required elements for including in the General Plan. Nevertheless, the City of Calexico has included this element to address sewer facilities, water systems, and storm drain facilities. It also addresses public services including police and fire. A key component of the discussion and policies is the implementation of mechanism to finance required capital improvements (City of Calexico 2007, p. 4-1). Calexico's current General Plan dated February 2007 was adopted by the City on May 1, 2007.

Table 4.10-9 analyzes the consistency of the Project with the applicable goals, objectives and policies relating to solid waste in the City of Calexico General Plan. While this EIR analyzes the Project's consistency with the General Plan pursuant to CEQA Guidelines Section 15125(d), the Calexico City Council ultimately determines consistency with the General Plan.

**TABLE 4.10-9
CITY OF CALEXICO COUNTY GENERAL PLAN CONSISTENCY ANALYSIS – ELECTRICITY**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
Public Facilities/Services Element		
4.4.1.12 Electricity		
Objective 12: To provide reliable electrical service capable of serving existing and future residential, commercial and industrial uses in the City.		

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**TABLE 4.10-9
CITY OF CALEXICO COUNTY GENERAL PLAN CONSISTENCY ANALYSIS – ELECTRICITY**

General Plan Goals and Objectives	Consistent with General Plan?	Analysis
<p>Policy 12a: The City shall coordinate with IID for the provision of adequate land within new developments and throughout the City for electrical substations and transmission facilities.</p>	Yes	<p>The proposed Project is currently coordinating with the IID for electrical service. IID has indicated that adequate capacity is available to serve Phase 1. A new substation would be required to provide adequate electricity to serve Phase 2. The City will be granting a portion of a piece of property to the IID to construct the substation. Therefore, the proposed Project is consistent with this policy.</p>

4.10.6.2 EXISTING SETTING

IID provides electric power to more than 150,000 customers in the Imperial Valley and parts of Riverside and San Diego counties including the City of Calexico. As the sixth largest utility in California, IID controls more than 1,100 megawatts (MWs) of energy derived from a diverse resource portfolio that includes its own generation, and long- and short-term power purchases. IID procures energy from traditional coal fired power plants, natural gas plants, hydroelectric and nuclear energy as well as renewable energy sources including: biomass, biowaste, geothermal, hydroelectric, solar and wind (IID 2018a).

IID provides the primary electrical service for residential, commercial, and industrial customers in the vast majority of Imperial County including the City of Calexico.

According to the 2014 Integrated Resource Plan (IID 2014), residential and commercial energy demand fell in 2009 and 2010 but rebounded in 2011 and 2012 and is expected to continue to grow. IID develops employment forecasts for the Imperial Valley to develop energy forecasts for residential and commercial use. IID has forecasted annual energy requirements through 2040 and a monthly peak demand through 2020 (IID 2014).

In 2013, the IID’s peak demand forecast was slightly above 1,000 MW at 1,012 MW. However, as a balancing authority, the IID is required to have generation resources providing spinning reserves, non-spinning reserves, operating reserves and planning reserves, totaling about 15 percent of the forecasted load. Thus, the IID required generation resources plus purchases equal to almost 1,164 MW for the peak summer month of 2013.

The IID meets its annual resource requirements through a mix of IID-owned generation and a number of purchase power contracts that consist of must-take contracts and call options. Due to the Renewable Portfolio Standard (RPS) and AB 32’s cap-and-trade regulation, IID’s resource fuel mix includes both conventional forms of generation and imported purchases, as well as renewable resources. These requirements have increased the need for a more diverse portfolio of varying fuel types to manage those fuels that do not allow economic dispatch. The IID’s generation resources range from hydroelectric resources on the All-American Canal System to San Juan Unit 3, a coal plant in New Mexico, to the Palo Verde Nuclear Generation station near Phoenix and natural gas and diesel generation within or near the IID’s service territory (IID 2014).

IID’s transmission system consists of 500-kV, 230-kV, 161-kV and 92-kV transmission lines. The transmission system is used to wheel bulk power supplies into and through the IID’s balancing authority.

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IID developed its Transmission Expansion Plan to meet forecasted load growth and to provide for transmission of Imperial Valley renewable generation to neighboring transmission systems. The IID–CFE Transmission Line Project (CFE is Mexico’s state-owned utility) consists of an eight-mile single-circuit 230-kV line from Highline Substation to the vicinity of IID’s Bravo Substation adjacent to the USA-Mexico border and from the USA-Mexico border the line will extend to a 230-kV substation in the City of Mexicali, Mexico. The future project will establish interconnection between the IID and CFE balancing authority areas with scheduling capacity from north to south (IID to CFE) and south to north (CFE to IID) directions (IID 2014).

4.10.6.3 IMPACTS AND MITIGATION MEASURES

A. STANDARDS OF SIGNIFICANCE

The impact analysis provided below is based on the CEQA Guidelines Appendix G thresholds of significance. The Project would have a significant impact to electrical service if it would:

- a) Result in the need for new systems or supplies of electricity, or a substantial expansion or alteration to electrical infrastructure that results in a physical impact on the environment.

B. METHODOLOGY

The analysis of impacts to electricity and electrical infrastructure was based on information provided by the Applicant as well as correspondence and conversations between the IID and the Applicant.

C. IMPACTS AND MITIGATION MEASURES

Impacts to Electrical Service and Infrastructure

Impact 4.10.12 The proposed Project would require approximately 12.63 MW of electricity per day 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**.

As noted in the Chapter 2.0, Project Description, Phase 1 of the Project will be served with electricity from the IID. The Applicant for Trinity 341 is in discussions with the IID to provide sufficient power to match the demand associated with each phase. The IID will provide electricity to Phase 1 from the existing infrastructure. The Applicant for Trinity 341 has met with IID and secured a will serve letter indicating the Utility has power available to serve Building A at 2421 Enterprise Boulevard (Phase 1) (Barazza, pers. comm., 2017).

The Applicant for Trinity 341, LLC is currently working towards procuring electricity for Phase 2 of the Project from IID. Building A, B, C and D are expected to require approximately 9.63 MW 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 per day. 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 per day will be required by January 2019 and an additional 3,000 amps per day will be necessary by January 1, 2020.

In order for the IID to provide electricity to Phase 2, a new 25-MW substation must be built. The City of Calexico has offered a site appropriately suited for the potential construction of a new substation. The

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site consists of a single parcel (APN 058-010-010) approximately 40 acres in size located southeast of the intersection of Kloke Road and Maddox Road. The substation, which requires a pad of 2.28 acres (315 feet x 315 feet) would be located in the northeast corner of the site as shown in **Figure 4.10-6**.

The Applicant for Trinity 341 has negotiated the basic points of a partnership with the IID in which Applicant and the IID would evenly share (50/50) the cost of construction of a substation, a transmission extension and enhancements. Depending upon the source of financing, amortization schedules range from ten (10) years to twenty-five (25) years. The Applicant for Trinity 341 will be reimbursed for its share of the cost of any required oversizing through the mechanism of a Reimbursement Agreement. The Agreement would contain provisions providing: 1) The means of collection of funds from subsequent users on a kVA basis; 2) the accounting of such funds; and 3) The timing and method of disbursement to the Applicant for Trinity 341. Phase 2 will require approximately 9.63 MW or forty-eight (48%) of the capacity of the first transformer of the new substation (25 MW, @ 80% = 20 MW per IID Distribution Guidelines and four feeders of 5 MWs each) (Irwin, pers. comm., 2018a).

Once the development of the substation has been approved by the IID Board of Directors and documented with the Applicant for Trinity 341 construction and commissioning is anticipated to take nine months (Irwin, pers. comm., 2018a). Construction of new infrastructure a **potentially significant impact**.

Mitigation Measures

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 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.

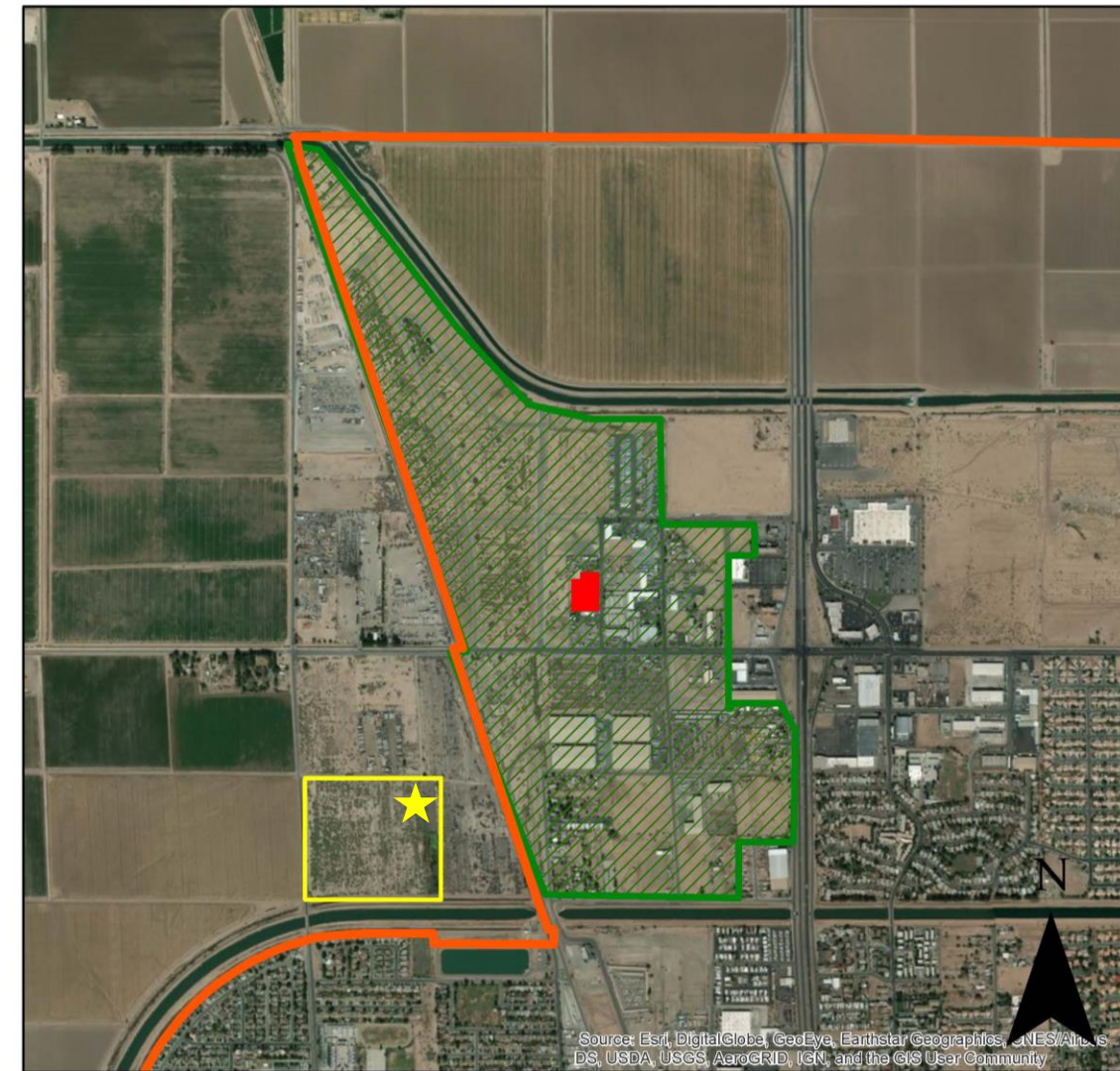
Timing/Implementation: As a condition of approval/City of Calexico and IID.

Enforcement/Monitoring: City of Calexico and IID.

Significance After Mitigation

Mitigation Measure MM 4.10.1 would address potential impacts to new electrical infrastructure and expansion of IID electrical facilities that would occur during Project construction and operation. Following implementation of MM 4.10.1, impacts to electrical facilities would be reduced to **less than significant**.

4.10 PUBLIC SERVICES AND UTILITIES



0.85 0.425 0 0.85 Miles

Source: Base Map DD&E 2017; EGI 2018.

Legend





-  Potentia New IID Substation Site
-  TRINITY 341 PROJECT SITE
-  City of Calexico Boundary Line
-  CANNABIS OVERLAY ZONE

FIGURE 4.10-6
PROPOSED SUBSTATION LOCATION

4.10.6.4 CUMULATIVE SETTING, IMPACTS AND MITIGATION MEASURES

A. CUMULATIVE SETTING

The cumulative setting for electrical service is the transmission and distribution lines which serve the City of Calexico. The proposed Project and all other proposed, approved and reasonably foreseeable projects in the City of Calexico identified in Table 3.0-1 in Chapter 3.0, Introduction to the Environmental Analysis and Assumptions Use. Of the six proposed, approved and reasonably foreseeable projects; the first phase of the Calexico Gran Plaza has been built and the second phase of development is on hold at the developer's request. It is unknown at this time when the second phase will commence. It is unlikely that the second phase will be in operation by the time the Trinity project is approved. The Las Palmas Mobile Home Park, an approximately 73-acre mixed-use development including 466 lots consisting of 330 single-family residential manufactured units and 136 RV spaces, has been approved and is currently under construction. The Calexico West Land Port of Entry is currently under construction. The Towne Center and Calexico Mega Park projects has been approved but not constructed. The remaining projects is still in process but has not yet been approved.

B. CUMULATIVE IMPACTS AND MITIGATION MEASURES

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**.

The first phase of the Calexico Gran Plaza has also been built and the second phase second phase of development is on hold at the developer's request and it is unknown at this time when the second phase will commence. It is unlikely that the second phase will be in operation by the time the Trinity project is approved. Thus, this project is past the construction period and its wastewater generation is accounted for in existing conditions.

The Calexico West Land Port of Entry has been funded for construction in 2018 and would expand the current facility to approximately 16 acres. The Calexico Mega Park is a 157-acre mixed used commercial development that has been approved and construction can begin at any time. The Town Center Industrial Park is a 133-acre industrial development that has been approved but not constructed. The Las Palmas Mobile Home Park, an approximately 73-acre mixed-use development including 466 lots consisting of 330 single-family residential manufactured units and 136 RV spaces, has been approved and is currently under construction. The El Portal Subdivision is a 157-acre residential development which is also undergoing environmental review.

Limited information is available regarding electrical demand of the cumulative projects. The Las Palmas Mobile Home Park is estimated to require 24,573 kilowatt hours (kWhs) per day. The El Portal Subdivision is estimated to require 16,060 kWhs per day (Detailed calculations are available in **Appendix I** of this EIR). Data needs for the Calexico West Land Port of Entry, Town Center Industrial Park and the Calexico Mega Park are unknown. However, because these projects have undergone environmental review and been approved it is assumed an adequate electric supply is available.

4.10 PUBLIC SERVICES AND UTILITIES

The Applicant for Trinity 341 submitted an application to the IID for service on January 20, 2017 (Irwin, pers. comm., 2018c). The IID provided an Amended Will Serve Letter dated July 6, 2017 as a follow-up to a previous Will Serve Letter dated June 29, 2017. In the July 6, 2017 letter, the IID outlined a Permanent Pan of Service for both Phase 1 and Phase 2 of the Project. The IID determined that Phase 1 could be accommodated from existing facilities while Phase 2 would require a new substation (Barraza, pers. comm., 2017). IID is currently doing preliminary work to construct a new substation to serve the proposed Project. The process of obtaining electrical service is on a parallel track while Phase 1 of the Project moves forward. IID would also serve as the lead agency performing the necessary environmental review of the new substation.

IID has also indicated that it does not have sufficient capacity to serve the El Portal Project. The Applicant is working with the IID and will be required to submit the applicable fees, permits, easements, electrical loads, panel size. Voltage, project CAD files, project schedule, estimated in-service date and environmental compliance documentation pertaining to the provision of electrical service to the project. All development projects are required to undergo this process and sufficient electrical infrastructure and capacity must be in place before development can be approved. Therefore, while the proposed Trinity Cannabis Cultivation and Manufacturing Facility's short-term contribution to electricity supply impacts would be **cumulatively considerable**, impacts would be reduced to **less than cumulatively considerable** with construction of a new substation.

Mitigation Measures

None required.

Significance After Mitigation

Not applicable.