

CHAPTER 6.0

ALTERNATIVES

CEQA Guidelines Section 15126.6(a) states that an environmental impact report shall describe and analyze a range of reasonable alternatives to a project. These alternatives should feasibly attain most of the basic objectives of the project while avoiding or substantially lessening one or more of the significant environmental impacts of the project. An EIR need not consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. The discussion of alternatives shall focus on those which are capable of avoiding or substantially lessening any significant effects of the project, even if they impede the attainment of the project objectives to some degree or would be costlier (CEQA Guidelines Section 15126.6(b)).

CEQA Guidelines Section 15126.6(d) states that the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. The matrix appears as **Table 6.0-1** at the end of this section.

6.1 PROJECT OBJECTIVES

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

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

6.2 ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR ANALYSIS

Identifying alternatives to the proposed Project was limited by the fact that the sites must be located within the Cannabis Overlay Zone (COZ); must be located a minimum distance of six hundred (600) feet away from any sensitive receptor; and be on parcels of sufficient size to accommodate development of no more than seventy-five percent (75%) of the acreage of a legal parcel in the COZ. Three alternative sites were identified but ultimately rejected from further analysis for the reasons noted.

6.2.1 230 WEAKLEY STREET ALTERNATIVE

This Alternative is located at 230 Weakley Street. This alternative was considered because it had an existing 48,000 sq. ft. metal building with a 30-foot ceiling on 5 acres of land. This alternative required tenant improvements to modify the existing building and incorporate a mezzanine structure to effectively double the usable square footage to approximately 96,000 sq. ft. This alternative also includes carving out a 10,000-sq. ft. parcel from the 5-acre site for the transportation and distribution facility. This alternative was rejected because it was near sensitive receptors (residences on California Court to the southeast); and the mezzanine floor plan was impractical. Thus, the 230 Weakley Street Alternative was rejected from further consideration.

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6.2.2 WAREHOUSES AT WEAKLEY STREET AND PORTICO BOULEVARD ALTERNATIVE

This Alternative would have developed the cultivation and manufacturing facility in existing warehouses located near the corner of Weakley Street and Portico Boulevard (northwest corner). It was rejected because it was near sensitive receptors (residences located across the street to the north on Weakly Street and Estrada Boulevard); it has an impractical size and mezzanine floor plan; and required a variance to meet minimum lot size(s). Thus, the Warehouses at Weakley Street and Portico Boulevard Alternative was rejected from further consideration.

6.2.3 LAND ON ROBINSON BOULEVARD AND SUNSET BOULEVARD ALTERNATIVE

This alternative would be sited on 37 acres of undeveloped land Robinson Boulevard and Sunset Boulevard. It was considered because the lot was large and economically feasible. This alternative was rejected because it was too close to a sensitive receptor (Small World Montessori Pre-School at 2450 Portico Boulevard). In addition, the site did not have an existing building which could be improved and occupied in a short period of time. The site required all new construction. Further, no power is available at this location. Thus, the Land on Robinson Boulevard and Sunset Boulevard Alternative was rejected from further consideration.

6.3 SUMMARY OF ALTERNATIVES ANALYZED

In accordance with the provisions of CEQA Guidelines Section 15126.6, the following alternatives to the proposed Project are evaluated:

6.3.1 ALTERNATIVE 1 – 2421 ENTERPRISE BOULEVARD WITH TRANSPORTATION AND DISTRIBUTION FACILITY (PHASE 1 ONLY)

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

6.3.2 ALTERNATIVE 2 – ALUMINUM REACTORS ENERGY ALTERNATIVE (TO SUPPORT PHASE 2)

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

Logistically a small space will be required for feedstock storage, essentially an area of lined cinderblock much like a rock or sand vendor. Cavendish will provide the aluminum input resources as well as ferry away the processed byproduct with, in general, both respectively sourced and sold locally or in the same

state via a Services Agreement between Cavendish and Trinity. Aluminum delivery and byproduct removal will typically be done on the same trip. Only one or two trips per month may be required of the feedstock vendor to reload scrap feedstock and remove byproducts of the energy generation process. Aluminum delivery and byproduct removal will typically be done on the same trip. Byproduct will be put into direct use in multiple industries including Federal Government facilities and/or Defense Contractors.

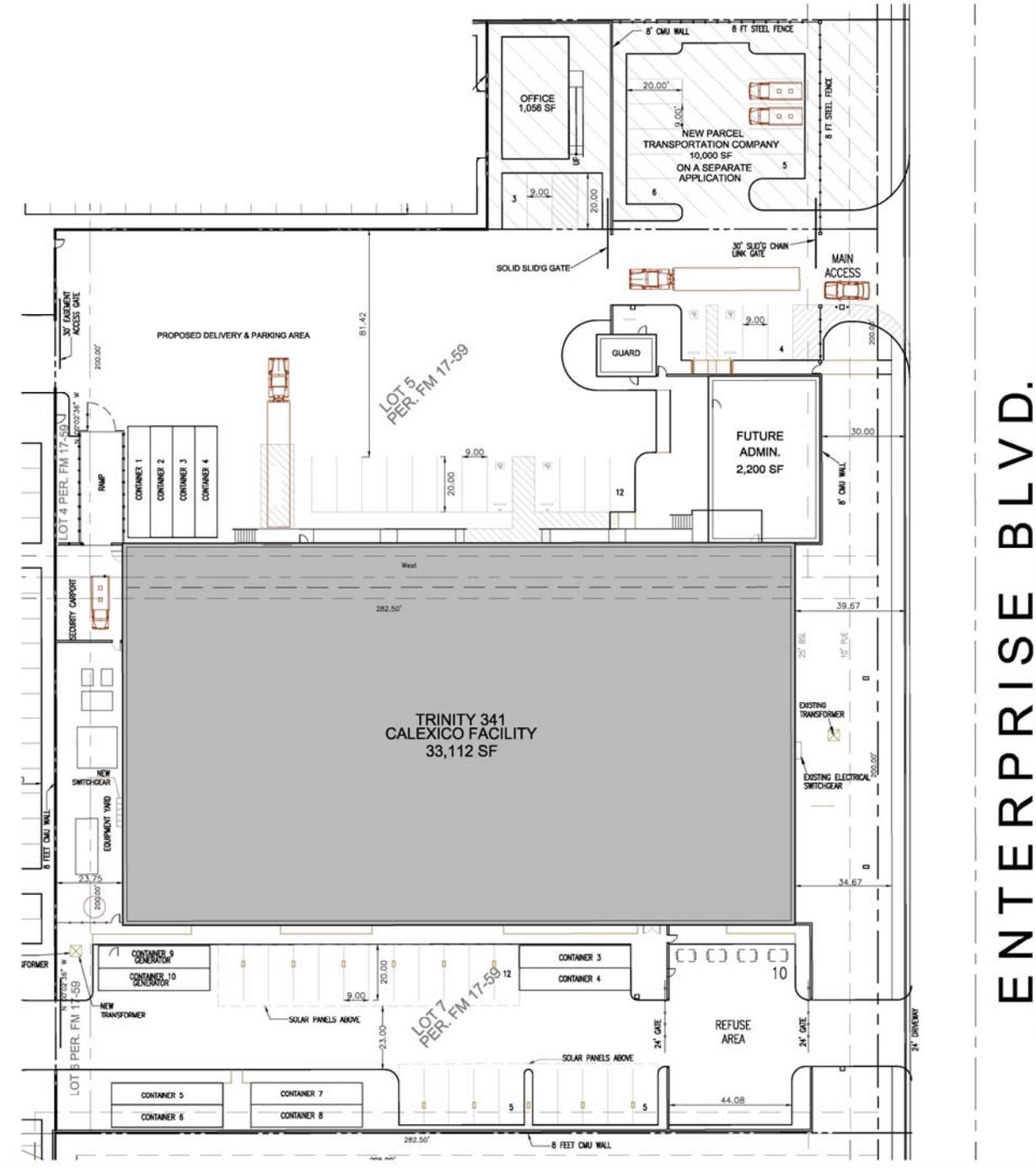
6.3.3 ALTERNATIVE 3 – ON-SITE SOLAR POWER ALTERNATIVE

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

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

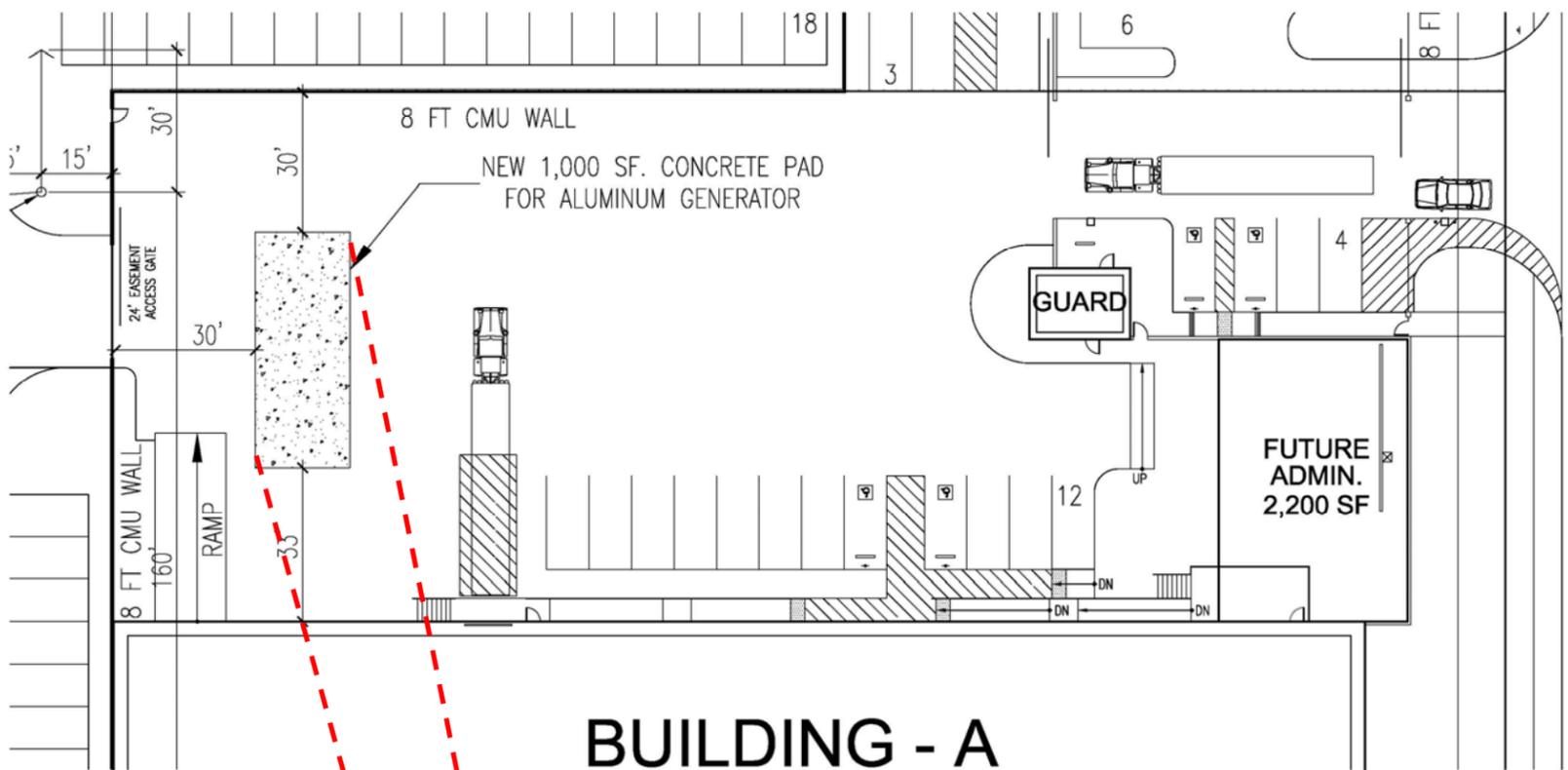
6.3.4 ALTERNATIVE 4 – NO PROJECT ALTERNATIVE (TO SUPPORT PHASE 2)

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



Source: McGee-Sharon Architects, Inc. 2017.

FIGURE 6.0-1
ALTERNATIVE 1 - 2421 ENTERPRISE BOULEVARD WITH TRANSPORTATION AND DISTRIBUTION FACILITY



BUILDING - A

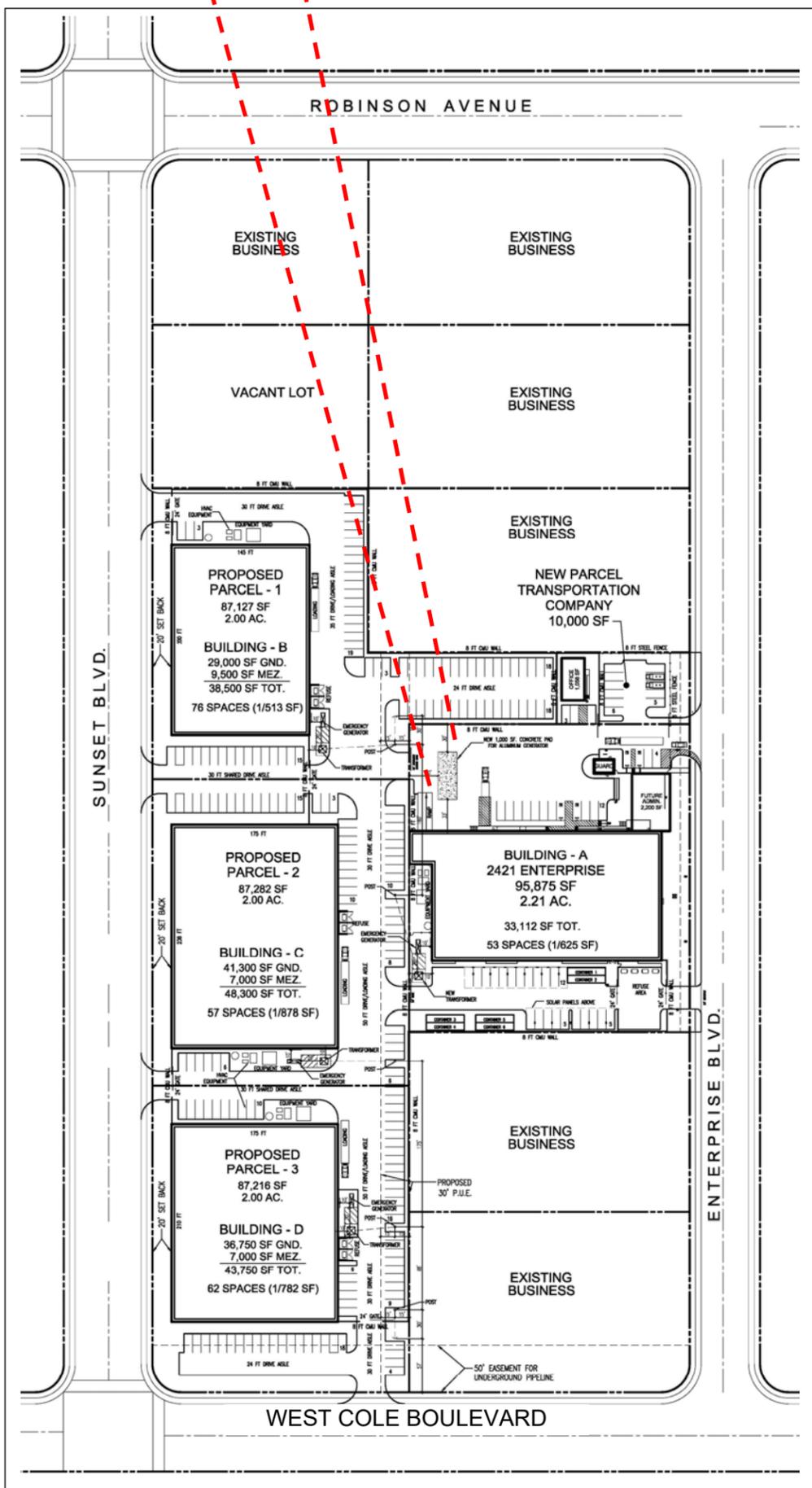


FIGURE 6.0-2

ALTERNATIVE 2 - ALUMINUM REACTORS ENERGY ALTERNATIVE

Source: McGee-Sharon Architects, Inc. 2018.

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OVERALL PV SYSTEM SIZE:
• 1.318 MWDC

SUNSET BLVD.

ENTERPRISE BLVD.

EAST COLE BOULEVARD

1 PHASE 1 (BUILDING "A"):	2 PHASE 2 (BUILDING "B"):	3 PHASE 3 (BUILDING "C"):	4 PHASE 4 (BUILDING "D"):
ROOF-TOP PV ARRAY: <ul style="list-style-type: none"> • (513) - 340W PV MODULES • 10° TILT / 180° AZIMUTH • SYSTEM SIZE: <ul style="list-style-type: none"> •• 174.42 kWDC 	ROOF-TOP PV ARRAY: <ul style="list-style-type: none"> • (589) - 340W PV MODULES • 10° TILT / 180° AZIMUTH • SYSTEM SIZE: <ul style="list-style-type: none"> •• 200.26 kWDC 	ROOF-TOP PV ARRAY: <ul style="list-style-type: none"> • (969) - 340W PV MODULES • 10° TILT / 180° AZIMUTH • SYSTEM SIZE: <ul style="list-style-type: none"> •• 329.46 kWDC 	ROOF-TOP PV ARRAY: <ul style="list-style-type: none"> • (817) - 340W PV MODULES • 10° TILT / 180° AZIMUTH • SYSTEM SIZE: <ul style="list-style-type: none"> •• 277.78 kWDC
CANOPY MOUNTED PV ARRAY: <ul style="list-style-type: none"> • (270) - 340W PV MODULES • 5-7° TILT • SYSTEM SIZE: <ul style="list-style-type: none"> •• 91.8 kWDC 	CANOPY MOUNTED PV ARRAY: <ul style="list-style-type: none"> • (288) - 340W PV MODULES • 5-7° TILT • SYSTEM SIZE: <ul style="list-style-type: none"> •• 97.92 kWDC 	CANOPY MOUNTED PV ARRAY: <ul style="list-style-type: none"> • (252) - 340W PV MODULES • 5-7° TILT • SYSTEM SIZE: <ul style="list-style-type: none"> •• 85.68 kWDC 	CANOPY MOUNTED PV ARRAY: <ul style="list-style-type: none"> • (180) - 340W PV MODULES • 5-7° TILT • SYSTEM SIZE: <ul style="list-style-type: none"> •• 61.2 kWDC

FIGURE 6.0-3
ALTERNATIVE 3 – ON-SITE SOLAR ENERGY ALTERNATIVE

Source: ZGLOBAL 2018.

6.4 ANALYSIS OF ALTERNATIVES

This section identifies the environmental effects of the alternatives and compares the environmental effects with those resulting from the proposed Project. **Table 6.0-1** at the end of this section provides a summary of the comparisons. An "environmentally superior" alternative is also identified.

6.4.1 ALTERNATIVE 1 – 2421 ENTERPRISE BOULEVARD WITH TRANSPORTATION AND DISTRIBUTION FACILITY

Alternative 1 consists of the existing building located at 2421 Enterprise Boulevard. Under this alternative, only the existing 33,112 sq. ft. building would be renovated and a 10,000-sq. ft. parcel with a separate APN would be established for the transportation office (**Figure 6.0-1**).

Characteristics

Under Alternative 1, only the existing building at 2421 Enterprise Boulevard (33,112 sq. ft.) would undergo tenant improvements to accommodate cannabis cultivation and manufacturing. The Transportation and Distribution Facility with 2,200 sq. ft. administration building, 1,056 transportation office and 323 sq. ft. guard house would also be constructed. A Lot Line Adjustment and parcel carve-out would be required to accommodate the Transportation and Distribution Facility. In summary, Alternative 1 is the same as Phase 1 of the proposed Project.

Relationship to Project Objectives

Implementation of the Alternative 1 would result in development of only one cannabis cultivation and manufacturing facility with a transportation and distribution facility rather than a total of four cannabis cultivation and manufacturing facilities and a transportation and distribution facility. No new construction of additional cannabis cultivation and manufacturing buildings would be undertaken.

Implementation of Alternative 1 would fulfill all the Project’s objectives, only to a lesser extent than the proposed Project (i.e. less economic growth than would occur with four cannabis cultivation and manufacturing facilities). Therefore, the transportation and distribution facility would achieve all the objectives identified for the proposed Project.

Comparative Impacts

Alternative 1 would result in less development than the proposed Project, have fewer cannabis cultivation and manufacturing facilities (one compared to four) and would not require development of additional electricity by the IID to serve the Project. A discussion of comparative impacts by resource area is provided below comparing Alternative 1 to the proposed Project.

Land Use

The existing building at 2421 Enterprise Boulevard is designated as "Industrial" on the City of Calexico General Plan Land Use Map and is within the Cannabis Overlay Zone (COZ). Alternative 1, like the proposed Project, is consistent with the General Plan land use designation of Industrial, existing zoning of Industrial and Commercial Highway, and is within the COZ overlay zone. Alternative 1 is not within any compatibility zones of the Calexico International Airport. Thus, potential for conflicts with an applicable land use plan, policy, or regulation is considered less than significant and similar for Alternative 1 and the proposed Project. Likewise, cumulative conflicts with applicable land use plans, policies and regulations would be similar and less than significant for both Alternative 1 and the proposed Project because projects within the City of Calexico must be consistent with General Plan Land Use designation and Zoning.

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Air Quality

Alternative 1 would not involve any disturbance of vacant land, only tenant improvements to 2421 Enterprise Boulevard and construction of the, transportation office, administration building and guard house. The proposed Project would not exceed an ICAPCD Tier 1 Significance Threshold for any criteria pollutants. Alternative 1, would result in less construction and operational emissions than the proposed Project it is smaller in scale and would not disturb vacant land. However, both construction and operational emissions from Alternative 1 could contribute to localized pollutant concentrations that could exceed applicable air quality standards and therefore could conflict with or obstruct implementation of an air quality plan. This would be considered potentially significant, but less intense than the proposed Project because of the reduced amount of construction and only one cultivation and manufacturing facility being in operation instead of five. Mitigation measures MM 4.2.1a and MM 4.2.1b would also apply to Alternative 1 to reduce short-term construction emission impacts and long-term operational emissions.

Alternative 1 would also result in lower operational emissions that could contribute on a cumulative basis to localized and/or regional air quality impacts compared to the proposed Project. While this impact is considered potentially significant, Alternative 1 would be less compared to the proposed Project given the reduced amount of disturbance and only one cultivation and manufacturing facility instead of five. Mitigation measures MM 4.2.1a and MM 4.2.1b would also apply to Alternative 1 to reduce short-term construction emission impacts and long-term operational emissions and result in a less than significant impact with regard to causing a net increase of a criteria pollutant.

Based on the reduced level of disturbance and construction activities, Alternative 1 would result in less impacts compared to the proposed Project with regard to exposing sensitive receptors to substantial pollutant concentrations. Both Alternative 1 and the proposed Project would result in similar less than significant impacts with regard to creating objectionable odors affecting a substantial number of people based on the incorporation of the SKYPLUME exhaust system and the Odor Control Plan. Alternative 1 would result in a smaller amount of operational emissions that could contribute, on a cumulative basis, to localized and/or regional air quality impacts compared to the proposed Project. Thus, cumulative impacts with regard to violation of an air quality standard would be less for Alternative 1 compared to the proposed Project.

Biological Resources

Alternative 1 would not involve any disturbance of vacant land, only tenant improvements to 2421 Enterprise Boulevard and construction of the administration building and guard house. Construction would occur on APN 059-343-018 and its proposed carve-out parcel. APN 059-343-018 is paved and does not have exposed soils aside from landscape areas. Thus, Alternative 1 would not require removal Big Saltbush scrub as would occur in association with the proposed Project. Impacts would be slightly less in this regard for Alternative 1, though impacts to candidate, sensitive, or special status species are considered less than significant for the proposed Project. Some landscape and ornamental vegetation surrounding 2421 Enterprise Boulevard which could have potential nesting habitat for raptors and other birds. Thus, impacts would be similar for both Alternative 1 and the proposed Project with regard to impacting nesting and migratory birds. Mitigation measures MM 4.3.2a and MM 4.3.2b would reduce potential impacts to nesting and migratory birds by limiting vegetation removal to non-breeding season or requiring a pre-construction nesting bird survey. If nesting birds are identified, a buffer would be established, and construction activities must avoid disturbance within the buffer zone. With implementation of these measures, impacts to nesting and migratory birds would be reduced to less than significant levels. If Alternative 1 would disturb any landscaping, MM 4.3.2a and MM 4.3.2b would be implemented. Therefore, impacts to nesting and migratory birds would be less than significant and similar

for both Alternative 1 and the proposed Project. The Project parcels do not contain sensitive habitat nor were any special status species observed during the Biological Resources Survey. However, no disturbance of vacant land would occur in association with Alternative 1. Therefore, cumulative impacts to biological resources (candidate, sensitive, or special status species and nesting and migratory birds) are less under Alternative 1 compared to the proposed Project.

Cultural and Paleontological Resources

Alternative 1 would not involve any disturbance of vacant land, only tenant improvements to 2421 Enterprise Boulevard and construction of the administration building and guard house. Construction would occur on areas which are currently paved. No historical resources are present that could be impacted by either Alternative 1 or the proposed Project. However, because Alternative 1 does not proposed any new construction, this alternative would avoid any impacts to Unrecorded subsurface archaeological resources, buried fossil remains, or human remains if present. Therefore, Alternative 1 would result in less impacts to historical, archaeological and paleontological resources and human remains compared to the proposed Project. Unlike the proposed Project, Alternative 1 would not require disturbance of vacant land. Thus, Alternative 1 would have less potential to impact unknown historical, archaeological and paleontological resources and human remains compared to the proposed Project. Likewise, on a cumulative level, Alternative 1 would result less cumulative impacts to historical, archaeological and paleontological resources and human remains compared to the proposed Project.

Geology and Soils

Alternative 1 would result in the development of one cultivation and manufacturing facility within an existing building. Because 2421 Enterprise Boulevard is located in a seismically active area, it has the potential to be exposed to strong ground shaking during an earthquake along several faults. The same would be true for the proposed Project, but three additional cultivation and manufacturing facilities would be exposed to strong groundshaking rather than just one. Mitigation measure MM 4.5.1 would reduce potential structural damage caused by strong seismic ground shaking by adhering to and enforcing the appropriate provisions of the 2016 CBC, ASCE 7-10 Seismic Parameters and CBC as appropriate for both Alternative 1 and the proposed Project.

The existing building at 2421 Enterprise Boulevard has already been constructed and engineered to address the soils on which it is located and would not be subject to erosion. The proposed Project would involve construction of three additional buildings for cultivation and manufacturing on soils classified as silty clay and clay. While the hazard of erosion on these soils is considered low, the proposed Project could be exposed to liquefaction, seismic settlement, expansive soils and corrosive soils. These represent potential impacts for the proposed Project that could be mitigated with implementation of mitigation measures to address these characteristics including MM 4.5.1 as well as MM 4.5.4 (preparation of a site-specific geotechnical investigation) and MM 4.5.5 use of Type V Portland Cement and zinc coatings. However, Alternative 1 would avoid these impacts thereby resulting in less impacts associated with geology and soils compared to the proposed Project. Unlike the proposed Project, Alternative 1 would not include tenant improvements to 2421 Enterprise Boulevard or construction of new buildings. Thus, Alternative 1 would result in less impacts with regard to exposure of people or structures to seismic hazards such as groundshaking, liquefaction/seismic settlement, erosion, expansive soils, and soil corrosivity. Likewise, on a cumulative level, Alternative 1 would result in cumulative geology and soils impacts similar to those of the proposed Project.

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Climate Change

Alternative 1 would result in far less short-term construction-generated GHGs compared to the proposed Project as there would be substantially less construction associated with tenant improvements at 2421 Enterprise Boulevard, the Transportation and Distribution Facility with 2,200 sq. ft. administration building, 1,056 transportation office and 323 sq. ft. guard house. Long-term operational emissions would also be reduced by approximately 75 to 80 percent in association with Alternative 1 based on operation of one cannabis cultivation and manufacturing facility compared to the four included as part of the proposed Project. Mitigation measures MM 4.2.1a j thru n and MM 4.2.1b as well as MM 4.6.1a thru MM 4.6.1g would help with reducing operational emissions for both the proposed Project and Alternative 1, however emissions would be far less with Alternative 1. While the operational emissions still be significant and unavoidable for Alternative 1, they would be less compared to the proposed Project. On a cumulative level, Alternative 1's contribution to short-term and long term GHG would be lower than would occur in association with the proposed Project based on the reduced size of the Project. While Alternative 1 would still contribute approximate one-fourth of the operational GHGs as the proposed Project (based on one cultivation and manufacturing facility instead of four), the cumulative contribution to GHG above the significance threshold would be less and therefore less compared to the proposed Project.

Hazards and Hazardous Materials

Construction of Alternative 1 would be limited to tenant improvements inside 2421 Enterprise Boulevard, construction of the administration building, guard house, and 8-foot tall steel fence and 8-foot tall concrete masonry unit fence around the perimeter of the property. Alternative 1 does not involve the use of large quantities of hazardous materials during construction or operation. However, it would be equipped with a diesel generator that would require occasional refueling which presents the possibility of leaks and spills. Mitigation measure MM 4.7.1 requires installation of features to reduce and avoid the potential for diesel leaks and spills. Thus, impacts with regard to potential leaks and spills of hazardous materials during transport would be reduced to less than significant. This impact would be similar for both Alternative 1 and the proposed Project, however, the proposed Project would have four diesel generators rather than just one. Likewise, transport of waste from the cultivation process is not considered hazardous. Alternative 1 would produce less waste than the proposed Project, but the impact of transporting the waste for disposal would be similar and less than significant given no psychoactive properties or harmful chemical residues are present in the waste material.

No evidence of recognized environmental conditions of any kind was identified as part of the Phase I ESA prepared for 2421 Enterprise Boulevard. The same was true for Parcels 1, 2 and 3 included in the proposed Project. Therefore, impacts associated with creating a hazard through reasonably foreseeable upset or release of hazardous materials is considered less than significant and similar for both Alternative 1 and the proposed Project.

The Small World Montessori School at 450 Portico Boulevard is approximately 850 feet to the northeast of the northeast corner of 2421 Enterprise Boulevard. Alternative 1 would be outfitted with a "SKYPLUME" exhaust system to disburse odors by dilution with outside air at high speeds. This technology along with the distance from the School would result in a less than significant impact with regard to emitting hazards within one-quarter mile of a school. The three additional cultivation and manufacturing facilities included as part of the proposed Project would be slightly further from the school and also be equipped with the "SKYPLUME" exhaust system. Therefore, Alternative 1 and the proposed Project would result in similar less than significant impacts with regard to emitting hazards emissions within one-quarter mile of a school.

None of the Project parcels had existing RECs. Alternative 1 would result in tenant improvements to the existing building at 2421 Enterprise Boulevard and the Project parcels would remain vacant land. Only one generator would be needed for the one cultivation and manufacturing facility reducing the potential for leaks and spills of diesel during refueling compared to the proposed Project. Although not considered a significant hazard, less waste and exhaust would be generated compared to the proposed Project. Therefore, cumulative hazards and hazardous materials impacts would be less in association with Alternative 1 compared to the proposed Project.

Hydrology and Water Quality

Alternative 1 includes tenant improvements to 2421 Enterprise Boulevard and construction of the administration building, transportation office and guard house. Construction would occur on areas which are currently paved. Alternative 1 would not result in any violations of water quality standards or waste discharge permits. Therefore, impacts would be less in this regard as compared to the proposed Project which involves increase runoff during construction as well as during operation through the introduction of buildings and impervious surfaces. The proposed Project would result in potentially significant impacts requiring mitigation to reduce potential for pollutants to be transported offsite in stormwater runoff. Mitigation measures MM 4.8.1a thru MM 4.8.1e would ensure that water quality standards or discharge requirements are not violated.

Alternative 1 would avoid impacts resulting from erosion as construction would occur in areas that are currently paved. Only minor soil disturbance would occur which would be addressed with standard Best Management Practices (BMPs). Therefore, potential for substantial erosion or siltation on- or off-site are considered less than significant for Alternative 1. In contrast, potentially significant impacts would occur with in association with erosion during construction of the proposed Project as 6.23 acres of vacant land would be graded and disturbed. Mitigation measures MM 4.8.1a and MM 4.8.1b (described above) as well as MM 4.8.2 (which requires installation of erosion barriers and soil stabilizers) would reduce impacts of the proposed Project to less than significant.

Alternative 1 is currently served by the City storm drainage infrastructure. The proposed Project would connect to the City's system as well and create new sources of runoff and discharges. However, both Alternative 1 and the proposed Project would result in similar less than significant impacts because the City has adequate storm drainage infrastructure.

Alternative 1 would not add any impervious surfaces to the Project parcels allowing for greater infiltration and less runoff compared to the proposed Project. As with the proposed Project, Alternative 1 would be required to obtain a General Industrial Permit and implement BMPs to control stormwater discharges. Therefore, Alternative 1's contribution to cumulative water quantity and quality impacts to the Salton Sea, IID's drainage system, and the New River are considered less than cumulative considerable and slightly greater for Alternative 1 based on less volume compared to the proposed Project.

Noise

Noise associated with the tenant improvements for Alternative 1 would occur mostly indoors. Some outdoor noise would be generated when the administration building, guard house and fence are constructed. However, no noise levels established in the City of Calexico Noise Ordinance would be exceeded during construction. While construction of the proposed Project would involve grading, delivery of materials, and other activities associated with building three new structures, noise levels would not exceed levels established in the City of Calexico Noise Ordinance. Therefore, although more noise would be generated in association with construction of the proposed Project as compared to Alternative 1, exposure to, or generation of, noise levels in excess of standards would be less than significant for both.

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Ground-borne vibration may occur for limited periods for aspects of construction required for Alternative 1 (administration building, guard house and fence). The same would be true for the proposed Project, but to a greater degree given that new construction of three new buildings would be undertaken. Neither Alternative 1 or the proposed Project would generate long-term ground-borne vibration noise. Overall, ground-borne vibration levels associated with short-term construction and long-term operational activities would not exceed applicable ground-borne vibration criteria at nearby land uses for both Alternative 1 and the proposed Project. Thus, impacts regarding ground-borne vibration are considered similar though potentially occurring in greater magnitude during construction of the proposed Project.

Operational noise for Alternative 1 would be generated by employee traffic and as well as the electrical motors used to power the "SKYPLUME" exhaust system. This is considered a potentially significant impact that would be mitigated with shielding around exhaust fans as prescribed in mitigation measure MM 4.9.3. Similar noise would be generated by each cultivation and manufacturing facility included as part of the proposed Project. With mitigation, the proposed Project would reduce operational noise impacts from fans and motors to less than significant levels. However, the amount of noise generated by employees and one cultivation and manufacturing facility and Transportation Distribution Facility included as part of Alternative 1 compared to four cultivation and manufacturing facilities, the 1,056-sq. ft. Transportation Office, 2,200 sq. ft. administration building, a 323 sq. ft. included as part of the proposed Project. Alternative 1 would result in less increases in ambient noise levels.

Temporary noise impacts from construction activities would result in an increase in the ambient noise level in the Project vicinity above levels existing without Alternative 1. The parcel on which 2421 Enterprise Boulevard (and the proposed parcel carve-out for the Transportation and Distribution Facility) is located is zoned Commercial Highway and would experience noise levels in excess of the City standards during construction. Similarly, the proposed Project includes three parcels within the Industrial zone. The City noise standard would be exceeded for several pieces of equipment during construction of the proposed Project. Therefore, both Alternative 1 and the proposed Project would result in potentially significant impacts with regard to a temporary or periodic increase in ambient noise levels. Mitigation measure MM 4.9.4a would reduce operational noise levels by 5 dBA and MM 4.9.4b requires intermittent noise measurements to ensure City standards are not exceeded beyond allowable durations. These mitigation measures would reduce temporary increases in noise levels to levels in that comply with City noise standards. However, it is acknowledged that less temporary noise would be created in association with construction of Alternative 1 compared to the proposed Project.

Alternative 1 would result in no new development on the Project parcels but would implement tenant improvements at 2421 Enterprise Boulevard. As such, construction and operational noise would be less than would occur in association with the proposed Project. Therefore, cumulative noise impacts would be less for Alternative 1 compared to the proposed Project.

Public Services and Utilities

Fire Protection

Alternative 1 (1 building/36,691 sq. ft./21 employees) would result in a smaller amount of square footage, buildings and employees requiring fire protection compared to the proposed Project (4 buildings/353,480 sq. ft./78 employees) The existing building at 2421 Enterprise Boulevard would undergo tenant improvements the 1,056-sq. ft. Transportation Office, 2,200 sq. ft. administration building, a 323 sq. ft. guard house would be constructed. Given the proximity of Alternative 1 to Fire Station No. 2, as well as the proposed fire safety features (sprinklers and Fire Emergency Plan) that would be required by the Calxico Fire Department, there would not be a need for new or altered fire facilities and impacts would

be less than significant. Impacts to fire protection for the proposed Project are also less than significant but would be less in association with Alternative 1 given less development and fewer employees requiring fire protection compared to the proposed Project.

Alternative 1 would result in less development (only one cultivation and manufacturing facility and the Transportation and Distribution Facility) requiring fire protection services. Like the proposed Project, Alternative 1 and all cumulative projects are required to pay Development Impact Fees to offset the demand for increased fire services. Because Alternative 1 would have less square footage and fewer employees, cumulative impacts to CFD services would be less for Alternative 1 compared to the proposed Project.

Law Enforcement

Alternative 1 (1 building/36,691 sq. ft./21 employees) would result in a smaller amount of square footage, buildings and employees requiring law enforcement compared to the proposed Project (4 buildings/353,480 sq. ft./78 employees). The existing building at 2421 Enterprise Boulevard would undergo tenant improvements the 1,056-sq. ft. Transportation Office, 2,200 sq. ft. administration building, and a 323 sq. ft. guard house would be constructed. Given the proximity of Alternative 1 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 Alternative 1, impacts to law enforcement services are considered less than significant. Impacts for the proposed Project are also less than significant but would be less in association with Alternative 1 given less development and fewer employees requiring law enforcement service compared to the proposed Project.

Alternative 1 would undertake tenant improvements at 2421 Enterprise Boulevard but would not construct any new buildings on the Project parcels. Like the proposed Project, Alternative 1 would be reviewed by the CPD to ensure that all potential security issues are addressed. In addition, Alternative 1 would be required to pay the Development Impact Fee to offset impacts to law enforcement services. Because Alternative 1 would have less square footage and fewer employees, cumulative impacts to CPD services would be less for Alternative 1 compared to the proposed Project.

Water Service

Alternative 1 (1 building/36,691 sq. ft./21 employees) would result in a lower demand for water compared to the proposed Project (4 buildings/353,480 sq. ft./78 employees) given less cultivation square footage and fewer employees. Tenant improvements at 2421 Enterprise Boulevard and construction of the 1,056-sq. ft. Transportation Office, 2,200 sq. ft. administration building, and a 323 sq. ft. guard included in Alternative 1 would require less construction water than the proposed Project. The Project area is already served by water lines and no increase in distribution or water supply would be needed to serve Alternative 1. Thus, impacts to water distribution and supply are less than significant for Alternative 1. Impacts for the proposed Project are also less than significant but would be less in association with Alternative 1 given less cultivation and manufacturing and fewer employees requiring water distribution and supply compared to the proposed Project.

Alternative 1 would result in lower water demand compared to the proposed Project based on development of one cultivation and manufacturing facility with tenant improvements to the existing building at 2421 Enterprise Boulevard. When considered cumulatively with the other projects, the water demand of either the proposed Project or Alternative 1 would not exceed the capacity of the existing water distribution system nor result in the need for new water supply entitlements. However, Alternative

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1 would require less water. Therefore, cumulative water distribution and water supply impacts are less in association with Alternative 1 compared to the proposed Project.

Wastewater Service

Alternative 1 (1 building/36,691 sq. ft./21 employees) would result in a lower generation of wastewater compared to the proposed Project (4 buildings/353,480 sq. ft./78 employees) given less cultivation square footage and fewer employees. Alternative 1 and the surrounding area is currently served by several sewer lines. The City's wastewater system has adequate conveyance and treatment capacity to provide wastewater service to Alternative 1. Thus, impacts to wastewater conveyance and treatment are less than significant for Alternative 1. Impacts for the proposed Project are also less than significant but would be less in association with Alternative 1 given less cultivation and manufacturing and fewer employees generating wastewater compared to the proposed Project.

Alternative 1 would generate less wastewater compared to the proposed Project based on one cultivation and manufacturing facility compared to development of four. 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. Alternative 4 would result in even less wastewater requiring conveyance and treatment compared to the proposed Project. Therefore, cumulative wastewater conveyance and treatment impacts are considered less in association with Alternative 1 compared to the proposed Project.

Solid Waste

Alternative 1 (1 building/36,691 sq. ft./21 employees) would result in a lower generation of solid waste (unusable leaf matter, rockwool cubes, trash) compared to the proposed Project (4 buildings/353,480 sq. ft./78 employees) given less cultivation square footage and fewer employees. The Imperial Landfill has sufficient permitted capacity to accommodate solid waste generated by construction and operation of the Alternative 1. Thus, impacts to solid waste are less than significant for Alternative 1. Impacts for the proposed Project are also less than significant but would be less in association with Alternative 1 given less cultivation and manufacturing as well as fewer employees generating waste compared to the proposed Project.

As with the proposed Project, Alternative 1 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 and similar impact is identified with regard to compliance with federal, state and local statutes and regulations related to solid waste for both Alternative 1 and the proposed Project.

Alternative 1 would result in cumulative demand for solid waste service and landfill capacity. However, Alternative 1 would produce less solid waste than the proposed Project as it only includes one cultivation and manufacturing facility. Therefore, cumulative impacts to solid waste service and landfill capacity would be less in association with Alternative 1 compared to the proposed Project.

Electricity

Alternative 1 (1 building/36,691 sq. ft./21 employees) would result in a lower demand for electricity (3 MW per day plus 200 to 240 volts of electricity for the Transportation and Distribution Office) compared to the proposed Project (4 buildings/353,480 sq. ft./78 employees requiring 12.63 MW per day) given less cultivation square footage and fewer employees. The IID has adequate electrical capacity available to serve Phase 1 of the Project such that a less than significant impact to electrical service would occur. However, IID will need to construct a new substation in order to have sufficient capacity to serve Phase 1 and 2 included as part of the proposed Project. The increase in electrical demand and the expansion of

existing infrastructure associated with Project operation is considered a potentially significant impact. Therefore, impacts to electricity would be less in association with Alternative 1 compared to the proposed Project.

Implementation of Alternative 1 would result in an increase in demand for electricity. The IID has adequate capacity to serve Alternative 1 with existing facilities and construction of a new substation or other facilities is not required. Therefore, cumulative impacts to electrical service are less in association with Alternative 1 compared to the proposed Project.

Transportation and Circulation

Alternative 1 would add short-term construction traffic during tenant improvements and long-term operational traffic associated with 18 employee trips (plus 3 employees for Transportation and Distribution Facility) and two weekly trips to distribute product. The traffic analysis determined that the proposed Project would add traffic to existing traffic volumes on West Cole Boulevard during construction and operation. The segment of West Cole Boulevard from Enterprise Boulevard to SR 111 would operate at LOS A with the addition of Project traffic. As a result, conflicts with the General Plan Circulation Element and impacts to LOS standards would be less than significant with the addition of Project traffic. Compared to the proposed Project, Alternative 1 would add substantially less construction and operational traffic to West Cole Boulevard. Therefore, Alternative 1 would also result in similar (though lower volumes of traffic) and less than significant impacts to LOS.

No new access points would be required to accommodate access to Alternative 1 as there are two driveways to 2421 Enterprise Boulevard in place along Enterprise Boulevard. In contrast, the proposed Project includes the construction of a new access points off of Sunset Boulevard and West Cole Boulevard. These access points will be required to be designed per all applicable City Standards. No new access points to a Caltrans facility are proposed. Because the proposed Project is not anticipated to substantially increase hazards due to a design feature, impacts are considered less than significant. Similarly, no impact would occur with regard to increasing hazards due to a design feature for Alternative 1.

Alternative 1 would result in implementation of one cultivation and manufacturing facility and the Transportation and Distribution Facility instead of four cultivation and manufacturing facility included as part of the proposed Project. Thus, Alternative 1 would add less construction and operational traffic to the segment West Cole Boulevard between Enterprise Boulevard and SR 111 as well as the intersections along this segment compared to the proposed Project. While the segment has adequate capacity remaining before it reaches LOS D and the intersections are currently above LOS C, conflicts with the General Plan Circulation Element and impacts to LOS standards would be less in association with Alternative 1 compared to the proposed Project.

Energy

Alternative 1 includes tenant improvements to 2421 Enterprise Boulevard and construction of the administration building, transportation office and guard house. These activities would involve the use of energy and gasoline during construction as well as during operation. Impacts with regard to wasteful, inefficient, and unnecessary consumption of energy were considered less than significant for the proposed Project. Because Alternative 1 would involve less construction and operational energy demands, impacts with regard to wasteful, inefficient, and unnecessary consumption of energy would also be less than significant but less in association with Alternative 1 compared to the proposed Project.

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6.4.2 ALTERNATIVE 2 – ALUMINUM REACTORS ENERGY ALTERNATIVE

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

Logistically a small space will be required for feedstock storage, essentially an area of lined cinderblock much like a rock or sand vendor. Cavendish will provide the aluminum input resources as well as ferry away the processed byproduct with, in general, both respectively sourced and sold locally or in the same state via a Services Agreement between Cavendish and Trinity. Aluminum delivery and byproduct removal will typically be done on the same trip. Only one or two trips per month may be required of the feedstock vendor to reload scrap feedstock and remove byproducts of the energy generation process. Aluminum delivery and byproduct removal will typically be done on the same trip. Byproduct will be put into direct use in multiple industries including Federal Government facilities and/or Defense Contractors.

Relationship to Project Objectives

Implementation of the Alternative 2 would result in development of the same facilities as the proposed Project: 167,241 sq. ft. including four cultivation and manufacturing facilities (including 2421 Enterprise Boulevard), a transportation and distribution facility, a 1,056-sq. ft. Transportation Office, 2,200 sq. ft. administration building, a 323 sq. ft. guard house and 263 parking spaces. In addition, Alternative 2 would develop eight aluminum reactors housed on-site in one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise Boulevard along with a cinder block storage for feedstock.

Implementation of Alternative 2 would fulfill all of the Project's objectives in the same measure as the proposed Project without the need for construction of a new IID substation to accommodate the energy needs of Phase 2.

Comparative Impacts

Alternative 2 would result in development of the same facilities as the proposed Project but would also have eight aluminum reactors housed on-site in one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise Boulevard as well as a cinder block storage area for feedstock. The aluminum reactors would generate electricity for Phase 2 of the Project (Buildings A, B and C). A discussion of comparative impacts by resource area is provided below comparing Alternative 2 to the proposed Project.

Land Use

Alternative 2 is identical to the proposed Project with the addition of eight aluminum reactors housed on-site in one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise Boulevard as well as a cinder block storage area for feedstock. Parcels 1, 2 and 2421 Enterprise Boulevard are zoned Industrial and proposed Parcel 3 is zoned Industrial and Commercial Highway. All of the parcels and 2421 Enterprise Boulevard are within the COZ. Because Alternative 2 is essentially identical to the proposed Project, Alternative 2 likewise is consistent with the General Plan land use designation of Industrial, existing zoning of Industrial and Commercial Highway, and is within the COZ overlay zone. Alternative 2 is not within any compatibility zones of the Calexico International Airport. Thus, potential for conflicts with an applicable

land use plan, policy, or regulation is considered less than significant and similar for Alternative 2 and the proposed Project. Likewise, cumulative conflicts with applicable land use plans, policies and regulations would be similar and less than significant for both Alternative 2 and the proposed Project because projects within the City of Calexico must be consistent with General Plan Land Use designation and Zoning.

Air Quality

Alternative 2 is identical to the proposed Project with the addition of eight aluminum reactors housed on-site in one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise Boulevard as well as a cinder block storage area for feedstock. The amount of construction and land disturbance is virtually identical to the proposed Project. Thus, construction emissions would be similar for both Alternative 2 and the proposed Project. Operational emissions are also anticipated to be similar or slightly less than the proposed Project because the aluminum reactors provide a carbon-neutral energy generation process to produce electrical power. However, both construction and operational emissions from Alternative 2 could contribute to localized pollutant concentrations that could exceed applicable air quality standards and therefore could conflict with or obstruct implementation of an air quality plan. This would be considered potentially significant and similar to the proposed Project. Mitigation measures MM 4.2.1a and MM 4.2.1b would also apply to Alternative 2 to reduce short-term construction emission impacts and long-term operational emissions.

Alternative 2 would result in lower operational emissions that could contribute on a cumulative basis to localized and/or regional air quality impacts compared to the proposed Project based on carbon-neutral energy generation from the aluminum reactors. While contributing on a cumulative basis to localized and or regional air quality impacts is considered potentially significant, Alternative 2 would be less compared to the proposed Project given the reduced amount of emissions from the aluminum reactors. Mitigation measures MM 4.2.1a and MM 4.2.1b would also apply to Alternative 2 to reduce short-term construction emission impacts and long-term operational emissions and result in a less than significant impact with regard to causing a net increase of a criteria pollutant.

Based on the reduced level of disturbance and construction activities, Alternative 2 would result in similar impacts compared to the proposed Project with regard to exposing sensitive receptors to substantial pollutant concentrations. Likewise, both Alternative 2 and the proposed Project would result in similar less than significant impacts with regard to creating objectionable odors affecting a substantial number of people based on the incorporation of the SKYPLUME exhaust system and the Odor Control Plan. Alternative 2 would result in a similar amount of operational emissions that could contribute, on a cumulative basis, to localized and/or regional air quality impacts compared to the proposed Project. The aluminum reactors provide a carbon-neutral energy generation process and would not increase operational emissions compared to the proposed Project. Thus, cumulative impacts with regard to violation of an air quality standard would be similar for both Alternative 2 and the proposed Project.

Biological Resources

Alternative 2 would disturb the same land area as the proposed Project. Like the proposed Project, Alternative 2 would require the removal of disturbed habitat and Big Saltbush scrub currently located the vacant land that comprises Parcels 1, 2 and 3. Impacts to candidate, sensitive, or special status species are considered less than significant for the proposed Project and would be the same for Alternative 2. Vegetation on the vacant parcels as well as landscape and ornamental vegetation surrounding 2421 Enterprise Boulevard could have potential nesting habitat for raptors and other birds. Thus, impacts would be the same for both Alternative 2 and the proposed Project with regard to impacting nesting and migratory birds. Mitigation measures MM 4.3.2a and MM 4.3.2b would reduce potential impacts to nesting and migratory birds by limiting vegetation removal to non-breeding season or requiring a pre-

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construction nesting bird survey. If nesting birds are identified, a buffer would be established and construction activities must avoid disturbance within the buffer zone. With implementation of these measures, impacts to nesting and migratory birds would be reduced to less than significant levels for both Alternative 2 and the proposed Project. The Project parcels do not contain sensitive habitat nor were any special status species observed during the Biological Resources Survey. Alternative 2 would result in a level of disturbance virtually identical to what would occur for the proposed Project. Therefore, cumulative impacts to biological resources (candidate, sensitive, or special status species and nesting and migratory birds) are similar for both Alternative 2 and the proposed Project.

Cultural and Paleontological Resources

Alternative 2 would involve the same degree of disturbance as the proposed Project. No historical resources are present that could be impacted by either Alternative 2 or the proposed Project. Impacts to unrecorded subsurface archaeological resources, buried fossil remains, or human remains if present would be potentially significant and identical for both Alternative 2 and the proposed Project. Mitigation measures have been identified to address impacts to unrecorded subsurface archaeological resources, buried fossil remains, or human remains if present. Mitigation measure MM 4.4.2 requires construction activities to be halted within a reasonable distance in the event that potential subsurface archaeological resources are discovered during construction. Mitigation measure MM 4.4.3 requires that an RPA be present to monitor certain excavation construction activities. Mitigation measure MM 4.4.4 requires construction activities to be halted or diverted in the event that human remains are discovered. Therefore, Alternative 2 would result in the same impacts to historical, archaeological and paleontological resources and human remains compared to the proposed Project. Furthermore, impacts to unrecorded subsurface archaeological resources, buried fossil remains, or human remains if present can be mitigated to less than significant for both Alternative 2 and the proposed Project with implementation of mitigation measures MM 4.4.2, MM 4.4.3 and MM 4.4.4. Alternative 2 would disturb virtually the same amount of vacant land as the proposed Project. Thus, Alternative 2 would have a similar impact to unknown historical, archaeological and paleontological resources and human remains as the proposed Project. On a cumulative level, Alternative 2 would also result in similar cumulative impacts to historical, archaeological and paleontological resources and human remains as the proposed Project.

Geology and Soils

Alternative 2 would result in development of the same facilities as the proposed Project and disturb approximately 6.23 acres of vacant land in addition to tenant improvements of 2421 Enterprise Boulevard. All facilities proposed as part of Alternative 2 are located in a seismically active area and have the potential to be exposed to strong ground shaking during an earthquake along several faults. Mitigation measure MM 4.5.1 would reduce potential structural damage caused by strong seismic ground shaking by adhering to and enforcing the appropriate provisions of the 2016 CBC, ASCE 7-10 Seismic Parameters and CBC as appropriate for both Alternative 2 and the proposed Project. This would apply to the pad for the aluminum reactors as well.

The existing building at 2421 Enterprise Boulevard has already been constructed and engineered to address the soils on which it is located and would not be subject to erosion. The new buildings included as part of Alternative 2 would be located on soils classified as silty clay and clay. While the hazard of erosion on these soils is considered low, Alternative 2 could be exposed to liquefaction, seismic settlement, expansive soils and corrosive soils. These potential impacts could be mitigated for both Alternative 2, including the 1,000 sq. ft. pad on which the aluminum reactors would be housed, and the proposed Project. Mitigation measures have been specifically formulated to address these characteristics including MM 4.5.1 (discussed above) as well as MM 4.5.4 (preparation of a site-specific geotechnical

investigation) and MM 4.5.5 (use of Type V Portland Cement and zinc coatings). Because Alternative 2 and the proposed Project are identical in terms of acreage that would be exposed to the same geologic and soil hazards, impacts are similar and would be reduced to less than significant levels with implementation of mitigation measures MM 4.5.1, MM 4.5.4 and MM 4.5.5. Like the proposed Project, Alternative 2 includes tenant improvements to 2421 Enterprise Boulevard as well as construction of new buildings as well as aluminum reactors. Thus, Alternative 2 would result in similar impacts with regard to exposure of people or structures to seismic hazards such as groundshaking, liquefaction/seismic settlement, erosion, expansive soils, and soil corrosivity. Likewise, on a cumulative level, Alternative 2 would result in cumulative geology and soils impacts similar to those of the proposed Project.

Climate Change

Alternative 2 would result in virtually the same short-term construction-generated GHGs as the proposed Project because Alternative 2 includes development of the same facilities as the proposed Project and the same amount of land disturbance. Long-term operational emissions would be less than the proposed Project because the aluminum reactors produce carbon-neutral energy. In addition, mitigation measures MM 4.2.1a j thru n and MM 4.2.1b as well as MM 4.6.1a thru MM 4.6.1g would help with reducing operational emissions for both the proposed Project and Alternative 2, but a significant unavoidable impact would still occur. While operational emissions GHG would be less and therefore slightly less for Alternative 2 compared to the proposed Project, this impact would still be significant and unavoidable. On a cumulative level, Alternative 2's contribution to short-term and long-term GHG emissions would be similar to the proposed Project because the same number (four) cultivation and manufacturing facilities are proposed for both Alternative 2 and the proposed Project with the addition of the aluminum reactors. No additional GHG would be attributed to the aluminum reactors based on the reactor's carbon-neutral energy generation process. Thus, Alternative 2 would contribute virtually the same construction and operational GHGs as the proposed Project (based on four cultivation and manufacturing facilities) and the cumulative contribution to GHG above the significance threshold would be the same as the proposed Project.

Hazards and Hazardous Materials

Alternative 2 does not involve the use of large quantities of hazardous materials during construction or operation. Like the proposed Project, Alternative 2 would be equipped with four diesel generators (one at each cultivation and manufacturing facility) that would require occasional refueling which presents the possibility of leaks and spills. Mitigation measure MM 4.7.1 requires installation of features to reduce and avoid the potential for diesel leaks and spills. Impacts with regard to potential leaks and spills of hazardous materials during transport would be similar for both Alternative 2 and the proposed Project and could be reduced to less than significant with implementation of MM 4.7.1. Transport of waste from the cultivation process is not considered hazardous. Alternative 2 would produce the same amount of cultivation waste as the proposed Project. Waste from the cultivation process does not contain psychoactive properties or harmful chemical residues. Alternative 2 would also create byproducts from the aluminum generator energy generation process. The byproducts would be stored in metal tanks prior to removal. Aluminum delivery and byproduct removal will typically be done on the same trip. Byproduct will be put into direct use in multiple industries including Federal Government facilities and/or Defense Contractors. Therefore, the impact of transporting the waste for disposal would be similar and less than significant for both Alternative 2 and the proposed Project.

No evidence of recognized environmental conditions of any kind was identified as part of the Phase I ESAs prepared for 2421 Enterprise Boulevard and Parcels 1, 2 and 3. Therefore, impacts associated with

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creating a hazard through reasonably foreseeable upset or release of hazardous materials is considered less than significant and exactly the same for both Alternative 2 and the proposed Project.

The Small World Montessori School at 450 Portico Boulevard is approximately 850 feet to the northeast of the northeast corner of 2421 Enterprise Boulevard. Like the proposed Project, each of the four cultivation and manufacturing buildings proposed as part of Alternative 2 would be outfitted with a “SKYPLUME” exhaust system to disburse odors by dilution with outside air at high speeds. This technology along with the distance from the School would result in a less than significant impact with regard to emitting hazards within one-quarter mile of a school. Therefore, Alternative 2 and the proposed Project would result in similar less than significant impacts with regard to emitting hazards emissions within one-quarter mile of a school.

Alternative 2 would result in tenant improvements to the existing building at 2421 Enterprise Boulevard and construction on the vacant parcels. Four generators would be needed for each cultivation and manufacturing facility resulting in a similar potential for leaks and spills of diesel during refueling as the proposed Project. Although not considered a significant hazard, the same amount of waste and exhaust would be generated in association with both Alternative 2 and the proposed Project. No hazards are associated with the aluminum reactors operation or feedstock. Therefore, cumulative hazards and hazardous materials impacts would be similar in association with Alternative 2 compared to the proposed Project.

Hydrology and Water Quality

Alternative 2 includes tenant improvements to 2421 Enterprise Boulevard, construction of three cultivation and manufacturing facilities and construction of the administration building, transportation office and guard house. Approximately 6.23 acres of vacant land would be covered with pavement and buildings on Parcels 1, 2 and 3. As with the proposed Project, implementation of Alternative 2 would increase runoff during construction as well as during operation through the introduction of buildings and impervious surfaces. Pollutants would be introduced to the site that could be transported offsite in stormwater runoff. Feedstock for the aluminum reactors would be stored in a lined cinder block area. Byproducts would also be stored in metal tanks prior to removal. Mitigation measures MM 4.8.1a thru MM 4.8.1e would ensure that water quality standards or discharge requirements are not violated. Obtaining an NPDES permit (MM 4.8.1a), preparing a SWPPP and implementing BMPs (MM 4.8.1.b) would address possible off-site transport of pollutants during construction. During operation, implementation of the City Standard Stormwater Mitigation Plan (MM 4.8.1c), as well as containing any leakage from dumpsters (MM 4.8.1.d) and containing spilled diesel (MM 4.8.1e) would protect water quality. Therefore, impacts associated with violating water quality standards or waste discharge requirements would be similar and reduced to less than significant with mitigation for both Alternative 2 and the proposed Project.

Similar potentially significant erosion impacts would occur during construction of both Alternative 2 and the proposed Project as 6.23 acres of vacant land would be graded and disturbed. Mitigation measures MM 4.8.1a and MM 4.8.1b (described above) as well as MM 4.8.2 (which requires installation of erosion barriers and soil stabilizers) would reduce erosion impacts for both Alternative 2 and the proposed Project to less than significant.

Like the proposed Project, Alternative 2 would increase on-site runoff and contribute additional discharges to the City infrastructure and the IID drain system. However, the addition of the aluminum reactors would not result in greater impervious surface or greater runoff than the proposed Project because the reactors would be within an area that would be paved. Based on the adequacy of existing storm drainage infrastructure, Alternative 2's potential to result in substantial flooding on- or off-site, or

to create or contribute runoff exceeding capacity, is the same and the proposed Project and a less than significant impact.

Alternative 2 would add the same amount of impervious surfaces to the Project parcels resulting in the same runoff patterns and volumes as the proposed Project. As with the proposed Project, Alternative 2 would be required to obtain a General Industrial Permit and implement BMPs to control stormwater discharges. Therefore, Alternative 2's contribution to cumulative water quantity and quality impacts to the Salton Sea, IID's drainage system, and the New River are considered less than cumulative considerable and similar for both the Alternative 2 and the proposed Project.

Noise

The amount of facilities to be constructed for Alternative 2 is identical to the proposed Project with the addition of a 1,000 sq. ft. pad for the aluminum reactors and a cinder block storage area for the feedstock. While construction Alternative 2 would involve grading, delivery of materials, and other activities associated with building three new structures, and performing tenant improvements on the building at 2421 Enterprise Boulevard, noise levels would not exceed levels established in the City of Calexico Noise Ordinance. Construction noise levels would be similar and less than significant for both the Alternative 2 and the proposed Project.

Ground-borne vibration may occur for limited periods during construction of Alternative 2. However, neither Alternative 2 or the proposed Project would generate long-term ground-borne vibration. The aluminum reactors would be housed in an enclosure on a 1,000 sq. ft. pad and are not expected to produce ground-borne vibration. Overall, ground-borne vibration levels associated with short-term construction and long-term operational activities would not exceed applicable ground-borne vibration criteria at nearby land uses for both Alternative 2 and the proposed Project. Thus, impacts regarding ground-borne vibration are considered similar and less than significant for both Alternative 2 and the proposed Project.

Operational noise for Alternative 2 would be similar to the levels produced by the proposed Project. Noise would include employee traffic and as well as the electrical motors used to power the "SKYPLUME" exhaust system at each of the four cultivation and manufacturing facilities. This noise is considered a potentially significant impact that would be mitigated with shielding around exhaust fans as prescribed in mitigation measure MM 4.9.3. T, there is no appreciable noise generated during operation by the aluminum reactors (i.e. much less than a conventional generator) (Irwin 2018). Moreover, the reactors would be enclosed in housing on a 1,000 sq. ft. pad. With mitigation, operational noise impacts from fans and motors can be reduced to less than significant levels for both Alternative 2 and the proposed Project. Impacts of operational noise would there be similar for both Alternative 2 and the proposed Project.

Temporary noise impacts from construction activities would result in an increase in the ambient noise level in the Project vicinity above levels existing without Alternative 2. The parcel on which 2421 Enterprise Boulevard (and the proposed parcel carve-out for the Transportation and Distribution Facility) is located is zoned Commercial Highway and would experience noise levels in excess of the City standards during construction. Similarly, the proposed Project includes three parcels within the Industrial zone. The City noise standard would be exceeded for several pieces of equipment during construction of the proposed Project. Alternative 2 involves essentially the same amount of construction as the proposed Project with the addition of a 1,000 sq. ft. pad and cinder block storage area for the feedstock. Construction of these features does not involve use of equipment not previously included in the list of construction equipment identified for the proposed Project. The proposed Project was determined to have a potentially significant impact with regard to a temporary or periodic increase in ambient noise levels. A similar potentially

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significant impact with regard to a temporary or periodic increase in ambient noise levels would occur for Alternative 2. Mitigation measure MM 4.9.4a would reduce operational noise levels by 5 dBA and MM 4.9.4b requires intermittent noise measurements to ensure City standards are not exceeded beyond allowable durations. These mitigation measures would reduce temporary increases in noise levels to levels in that comply with City noise standards. Therefore, temporary increases in noise levels would be similar for both Alternative 2 and the proposed Project.

Alternative 2 would result in the same amount of construction and operational noise as the proposed Project. Operation of the aluminum reactors is not anticipated to result in an appreciable increase in operational noise. Therefore, cumulative noise impacts would be similar for both Alternative 2 and the proposed Project.

Public Services and Utilities

Fire Protection

Alternative 2 (4 buildings/353,480 sq. ft./78 employees) is identical to the proposed Project with the addition of eight aluminum reactors housed on-site in one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise Boulevard as well as a cinder block storage area for feedstock. Given the proximity of Alternative 2 to Fire Station No. 2, as well as the proposed fire safety features (sprinklers and Fire Emergency Plan) that would be required by the Calexico Fire Department, there would not be a need for new or altered fire facilities and impacts would be less than significant. Impacts for the proposed Project are also less than significant.

Alternative 2 would result the same amount of buildings and employees requiring fire protection services with the addition of the aluminum reactors. The reactor and feedstock component do not increase the risk of fire as neither are considered flammable or explosive. Like the proposed Project, Alternative 2 and all cumulative projects are required to pay Development Impact Fees to offset the demand for increased fire services. Because Alternative 2 would have the same amount of square footage and employees as the proposed Project, cumulative impacts to CFD services would be similar for both Alternative 2 and the proposed Project.

Law Enforcement

Alternative 2 (4 buildings/353,480 sq. ft./78 employees) is identical to the proposed Project with the addition of eight aluminum reactors housed on-site in one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise Boulevard as well as a cinder block storage area for feedstock. Given the proximity of Alternative 2 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 Alternative 2, impacts to law enforcement services are considered less than significant.

Alternative 2 would result in the same amount of development and employees as the proposed Project with the addition of the aluminum reactors. Like the proposed Project, Alternative 2 would be reviewed by the CPD to ensure that all potential security issues are addressed. In addition, Alternative 2 would be required to pay the Development Impact Fee to offset impacts to law enforcement services. Because Alternative 2 would have the same amount of square footage and employees as the proposed Project, cumulative impacts to CPD services would be similar for both Alternative 2 and the proposed Project given that the aluminum reactors are not anticipated to increase demand for law enforcement services.

Water Service

Alternative 2 (4 buildings/353,480 sq. ft./78 employees) is identical to the proposed Project with the addition of eight aluminum reactors housed on-site in one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise Boulevard as well as a cinder block storage area for feedstock. The Project area is already served by water lines and no increase in distribution or water supply would be needed to serve Alternative 2. The aluminum reactor process produces small amounts of water that can be processed and subsequently used in cultivation as well as generating a byproduct that can be sold for application in wastewater treatment. Thus, impacts to water distribution and supply are less than significant for Alternative 2. Impacts for the proposed Project are also less than significant and would be similar in association with Alternative 2 given that the aluminum reactors would not increase demand for water supply or distribution. Instead, the aluminum reactors may slightly reduce water demand if the water from the energy generation process is reused for cultivation.

Alternative 2 would result a similar water demand compared to the proposed Project based on the same level of development (4 buildings/353,480 sq. ft./78 employees). The aluminum reactors included as part of Alternative 2 would not increase demand for water over levels required for the proposed Project. When considered cumulatively with the other projects, the water demand of either the proposed Project or Alternative 2 would not exceed the capacity of the existing water distribution system nor result in the need for new water supply entitlements. Both Alternative 2 and the proposed Project would require similar demand for water. Therefore, cumulative water distribution and water supply impacts are considered similar for both Alternative 2 and the proposed Project.

Wastewater

Alternative 2 (4 buildings/353,480 sq. ft./78 employees) is identical to the proposed Project with the addition of eight aluminum reactors housed on-site in one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise Boulevard as well as a cinder block storage area for feedstock. Alternative 2 and the surrounding area is currently served by several sewer lines. The City's wastewater system has adequate conveyance and treatment capacity to provide wastewater service to Alternative 2. Thus, impacts to wastewater conveyance and treatment are less than significant for Alternative 2. Impacts for the proposed Project are also less than significant and would be similar in association with Alternative 2 given that the aluminum reactors would not generate wastewater.

Alternative 2 would generate the same amount of wastewater as the proposed Project based on the same level of development (4 buildings/353,480 sq. ft./78 employees). The aluminum reactors included as part of Alternative 2 would not generate any wastewater. 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. Alternative 2 would generate the same amount of wastewater requiring conveyance and treatment as the proposed Project. Therefore, cumulative wastewater conveyance and treatment impacts are considered similar for both the Alternative 2 and the proposed Project.

Solid Waste

Alternative 2 (4 buildings/353,480 sq. ft./78 employees) is identical to the proposed Project with the addition of eight aluminum reactors housed on-site in one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise Boulevard as well as a cinder block storage area for feedstock. The Imperial Landfill has sufficient permitted capacity to accommodate solid waste generated by construction and operation of the Alternative 2. Only one or two trips per month may be required of the feedstock vendor to remove byproducts of the energy generation process. Byproduct will be put into direct use in multiple industries

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including Federal Government facilities and/or Defense Contractors. Thus, impacts to solid waste are less than significant for Alternative 2. Impacts for the proposed Project are also less than significant but would be slightly greater in association with Alternative 2 given the generation of byproduct waste from the aluminum generators.

As with the proposed Project, Alternative 2 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 and similar impact is identified with regard to compliance with federal, state and local statutes and regulations related to solid waste for both Alternative 2 and the proposed Project.

Alternative 2 would result in cumulative demand for solid waste service and landfill capacity similar to the proposed Project. However, Alternative 2 would also produce byproducts from the aluminum reactor energy generation process. These byproducts would be removed separately from cultivation and operational waste and would not be disposed of at a landfill. Therefore, cumulative impacts to solid waste service and landfill capacity would be similar for both Alternative 2 and the proposed Project.

Electricity

Alternative 2 (4 buildings/353,480 sq. ft./78 employees) is identical to the proposed Project with the addition of eight aluminum reactors housed on-site in one 1,000 sq. ft. pad located in the parking lot north of 2421 Enterprise Boulevard as well as a cinder block storage area for feedstock. Alternative 2 would require the same energy demand of 12.63 MW as the proposed Project. However, Alternative 2 would use on-site aluminum reactors to generate electricity needed to support Phase 2 energy independent of the IID thereby avoiding the need for a new substation as would be required in association with the proposed Project. Therefore, impacts to electricity would be less in association with Alternative 2 compared to the proposed Project.

Implementation of Alternative 2 would result in an increase in demand for electricity identical to the proposed Project. Because the IID does not have adequate capacity to serve Alternative 2 with existing facilities, Alternative 2 includes eight aluminum reactors. The inclusion of the aluminum reactors as part of Alternative 2 would eliminate the need for IID to construct a new substation to serve Alternative 2. Therefore, cumulative impacts to electrical service are less in association with Alternative 2 compared to the proposed Project.

Transportation and Circulation

Alternative 2 would add short-term construction traffic and long-term operational traffic associated with 75 employee trips (plus 3 employees for Transportation and Distribution Facility) and two weekly trips to distribute product for each of the four cultivation and manufacturing facilities. The traffic analysis determined that the proposed Project would add traffic to existing traffic volumes on West Cole Boulevard during construction and operation. The segment of West Cole Boulevard from Enterprise Boulevard to SR 111 would operate at LOS A with the addition of Project traffic. As a result, conflicts with the General Plan Circulation Element and impacts to LOS standards would be less than significant with the addition of Project traffic. Compared to the proposed Project, Alternative 2 would result in the same short-term and long-term traffic volumes with a very slight increase in operational trips attributed to aluminum delivery and byproduct removal. Delivery and removal will typically be done on the same trip and require only one or two trips per month. Therefore, Alternative 2 would also result in similar and less than significant impacts to LOS.

As with the proposed Project, Alternative 2 would include the construction of a three new access points off of Sunset Boulevard and one off of West Cole Boulevard. These access points will be required to be designed per all applicable City Standards. No new access points to a Caltrans facility are proposed.

Because the proposed Project is not anticipated to substantially increase hazards due to a design feature, impacts are considered less than significant. Similarly, no impact would occur with regard to increasing hazards due to a design feature for Alternative 2.

Alternative 2 would result in implementation of the same amount of development as the proposed Project with the addition of the aluminum reactors. Thus, Alternative 2 would add similar construction and operational traffic (very slight increase in operational trips attributed to aluminum delivery and byproduct removal) to the segment West Cole Boulevard between Enterprise Boulevard and SR 111 as well as the intersections along this segment compared to the proposed Project. While the segment has adequate capacity remaining before it reaches LOS D and the intersections are currently above LOS C, conflicts with the General Plan Circulation Element and impacts to LOS standards would be similar for both Alternative 2 and the proposed Project.

Energy

The amount of facilities to be constructed for Alternative 2 is identical to the proposed Project with the addition of a 1,000 sq. ft. pad for the aluminum reactors and a cinder block storage area for the feedstock. Alternative 2 would involve the use of energy and gasoline during construction as well as during operation. Impacts with regard to wasteful, inefficient, and unnecessary consumption of energy were considered less than significant for the proposed Project. Because Alternative 2 includes an energy generating component in the aluminum reactors, impacts with regard to wasteful, inefficient, and unnecessary consumption of energy would also be less than significant and less for Alternative 2 compared to the proposed Project.

6.4.3 ALTERNATIVE 3 – ON-SITE SOLAR POWER ALTERNATIVE

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

Under this Alternative, the on-site solar facilities will self-generate approximately 1.5 MW or sixteen percent (16%) of the total steady-state electrical usage needs by employing rooftop mounted solar panel installations on each building and future carports (**Figure 6.0-3**). The carports will be designed to utilize the proposed parking areas adjacent to Buildings A, B, C and D. In addition, the Project is proposing to install a power configuration energy storage system (e.g., Tesla batteries) that will be sited adjacent to the emergency generator for Building D. The energy storage system will consist of two 7-foot by 12-foot self-contained cabinets that will be designed to be connected to the facilities' electrical infrastructure and synchronized to the IID, the electric utility, "behind the meter" (i.e., connect between IID and the facility tie-in point). The power generated under non-peak circumstances supplies energy directly to the facility rather than accessing power from, or selling power to, the IID's electrical grid. The Project's energy storage system can generate sufficient short-term electricity that will be used to off-set demand peaks in IID's system during spikes in energy usage.

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Relationship to Project Objectives

Implementation of the Alternative 3 would result in development of the same facilities as the proposed Project: 167,241 sq. ft. including four cultivation and manufacturing facilities (including 2421 Enterprise Boulevard), a transportation and distribution facility, a 1,056-sq. ft. Transportation Office, 2,200 sq. ft. administration building, a 323 sq. ft. guard house and 263 parking spaces. In addition, Alternative 3 would develop rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets.

Implementation of Alternative 3 would fulfill all of the Project's objectives in the same measure as the proposed Project without the need for construction of a new IID substation to accommodate the energy needs of Phase 2.

Comparative Impacts

Alternative 3 would result in development of the same facilities as the proposed Project but would also develop rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. A discussion of comparative impacts by resource area is provided below comparing Alternative 3 to the proposed Project.

Land Use

Alternative 3 is identical to the proposed Project with the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. Parcels 1, 2 and 2421 Enterprise Boulevard are zoned Industrial and proposed Parcel 3 is zoned Industrial and Commercial Highway. All of the parcels and 2421 Enterprise Boulevard are within the COZ. There are no prohibitions or conflicts associated with development of rooftop solar within these land use or zoning designations. Because Alternative 3 is essentially identical to the proposed Project with the addition of an on-site solar component, Alternative 3 likewise is consistent with the General Plan land use designation of Industrial, existing zoning of Industrial and Commercial Highway, and is within the COZ overlay zone. Alternative 3 is not within any compatibility zones of the Calexico International Airport. Thus, potential for conflicts with an applicable land use plan, policy, or regulation is considered less than significant and similar for Alternative 3 and the proposed Project. Likewise, cumulative conflicts with applicable land use plans, policies and regulations would be similar and less than significant for both Alternative 3 and the proposed Project because projects within the City of Calexico must be consistent with General Plan Land Use designation and Zoning.

Air Quality

Alternative 3 is identical to the proposed Project with the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. The amount of land disturbance is virtually identical to the proposed Project. However, there would be slightly higher construction traffic associated with delivery of materials and worker trips to install the solar panels. Thus, construction emissions would be greater and therefore greater for Alternative 3 compared to the proposed Project. Operational emissions are also anticipated to be similar or slightly less than the proposed Project because the solar panels would offset emissions associated with producing non-renewable electricity that would otherwise be used to serve Phase 2 of the project. However, both construction and operational emissions from Alternative 3 could

contribute to localized pollutant concentrations that could exceed applicable air quality standards and therefore could conflict with or obstruct implementation of an air quality plan. This would be considered potentially significant and similar to the proposed Project. Mitigation measures MM 4.2.1a and MM 4.2.1b would also apply to Alternative 3 to reduce short-term construction emission impacts and long-term operational emissions.

Alternative 3 would result in lower operational emissions that could contribute on a cumulative basis to localized and/or regional air quality impacts compared to the proposed Project. This is based on Alternative 3's production of 16% of the total steady-state electrical usage needs through rooftop mounted solar panel installations on each building and future carports. While contributing on a cumulative basis to localized and or regional air quality impacts is considered potentially significant, Mitigation measures MM 4.2.1a and MM 4.2.1b would also apply to Alternative 3 to reduce short-term construction emission impacts and long-term operational emissions and result in a less than significant impact with regard to causing a net increase of a criteria pollutant.

Based on the reduced level of disturbance and construction activities, Alternative 3 would result in similar impacts compared to the proposed Project with regard to exposing sensitive receptors to substantial pollutant concentrations. Likewise, both Alternative 3 and the proposed Project would result in similar less than significant impacts with regard to creating objectionable odors affecting a substantial number of people based on the incorporation of the SKYPLUME exhaust system and the Odor Control Plan. Alternative 3 would result in an amount of operational emissions similar to the Project that could contribute, on a cumulative basis, to localized and/or regional air quality impacts. Thus, cumulative impacts with regard to violation of an air quality standard would be similar for Alternative 3 compared to the proposed Project.

Biological Resources

Alternative 3 would disturb the same land area as the proposed Project. The of the on-site solar aspect of Alternative 3 would be on building rooftops and carports and would not require any additional off-site disturbance. Like the proposed Project, Alternative 3 would require the removal of disturbed habitat and Big Saltbush scrub currently located the vacant land that comprises Parcels 1, 2 and 3. Impacts to candidate, sensitive, or special status species are considered less than significant for the proposed Project and would be the same for Alternative 3. Vegetation on the vacant parcels as well as landscape and ornamental vegetation surrounding 2421 Enterprise Boulevard could have potential nesting habitat for raptors and other birds. If any of this vegetation needs to be removed to accommodate construction of the on-site solar, this could also impact nesting habitat. Overall, impacts would be the same for both Alternative 3 and the proposed Project with regard to impacting nesting and migratory birds. Mitigation measures MM 4.3.2a and MM 4.3.2b would reduce potential impacts to nesting and migratory birds by limiting vegetation removal to non-breeding season or requiring a pre-construction nesting bird survey. If nesting birds are identified, a buffer would be established and construction activities must avoid disturbance within the buffer zone. With implementation of these measures, impacts to nesting and migratory birds would be reduced to less than significant levels for both Alternative 3 and the proposed Project. The Project parcels do not contain sensitive habitat nor were any special status species observed during the Biological Resources Survey. Alternative 3 would result in a level of disturbance virtually identical to what would occur for the proposed Project. Therefore, cumulative impacts to biological resources (candidate, sensitive, or special status species and nesting and migratory birds) are similar for both Alternative 3 and the proposed Project.

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Cultural and Paleontological Resources

Alternative 3 would involve the same degree of disturbance as the proposed Project. No historical resources are present that could be impacted by either Alternative 3 or the proposed Project. Impacts to unrecorded subsurface archaeological resources, buried fossil remains, or human remains if present would be potentially significant and identical for both Alternative 3 and the proposed Project. Mitigation measures have been identified to address impacts to unrecorded subsurface archaeological resources, buried fossil remains, or human remains if present. Mitigation measure MM 4.4.2 requires construction activities to be halted within a reasonable distance in the event that potential subsurface archaeological resources are discovered during construction. Mitigation measure MM 4.4.3 requires that an RPA be present to monitor certain excavation construction activities. Mitigation measure MM 4.4.4 requires construction activities to be halted or diverted in the event that human remains are discovered. Therefore, Alternative 3 would result in the same impacts to historical, archaeological and paleontological resources and human remains compared to the proposed Project. Furthermore, impacts to unrecorded subsurface archaeological resources, buried fossil remains, or human remains if present can be mitigated to less than significant for both Alternative 3 and the proposed Project with implementation of mitigation measures MM 4.4.2, MM 4.4.3 and MM 4.4.4. Alternative 3 would disturb virtually the same amount of vacant land as the proposed Project. Thus, Alternative 3 would have a similar impact to unknown historical, archaeological and paleontological resources and human remains as the proposed Project. On a cumulative level, Alternative 3 would also result in similar cumulative impacts to historical, archaeological and paleontological resources and human remains as the proposed Project.

Geology and Soils

Alternative 3 would result in development of the same facilities as the proposed Project with the addition of on-site solar developed on building rooftops and future carports. Alternative 3 also includes two 7-foot by 12-foot self-contained cabinets for the battery energy storage system. Both Alternative 3 and the proposed Project would disturb approximately 6.23 acres of vacant land in addition to tenant improvements of 2421 Enterprise Boulevard. The solar facilities would all be located within the footprint of the project Parcels and have the potential to be exposed to strong ground shaking during an earthquake along several faults. Mitigation measure MM 4.5.1 would reduce potential structural damage caused by strong seismic ground shaking by adhering to and enforcing the appropriate provisions of the 2016 CBC, ASCE 7-10 Seismic Parameters and CBC as appropriate for both Alternative 3 and the proposed Project.

The existing building at 2421 Enterprise Boulevard has already been constructed and engineered to address the soils on which it is located and would not be subject to erosion. The new buildings included as part of Alternative 3 would be located on soils classified as silty clay and clay. While the hazard of erosion on these soils is considered low, Alternative 3 could be exposed to liquefaction, seismic settlement, expansive soils and corrosive soils. These potential impacts could be mitigated for both Alternative 3, including the proposed on-site solar facilities, and the proposed Project. Mitigation measures have been specifically formulated to address these characteristics including MM 4.5.1 (discussed above) as well as MM 4.5.4 (preparation of a site-specific geotechnical investigation) and MM 4.5.5 (use of Type V Portland Cement and zinc coatings). Because Alternative 3 and the proposed Project are identical in terms of acreage that would be exposed to the same geologic and soil hazards, impacts are similar and would be reduced to less than significant levels with implementation of mitigation measures MM 4.5.1, MM 4.5.4 and MM 4.5.5. Like the proposed Project, Alternative 3 includes tenant improvements to 2421 Enterprise Boulevard as well as construction of new buildings as well as rooftop and carport solar facilities. Thus, Alternative 3 would result in similar impacts with regard to exposure of people or structures to seismic hazards such as groundshaking, liquefaction/seismic settlement, erosion,

expansive soils, and soil corrosivity. Likewise, on a cumulative level, Alternative 3 would result in cumulative geology and soils impacts similar to those of the proposed Project.

Climate Change

Alternative 3 would result in similar but slightly higher short-term construction-generated GHGs as the proposed Project because Alternative 3 includes installation of on-site solar facilities. Long-term operational emissions would be reduced approximately 16 percent as a result of the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Mitigation measures MM 4.2.1a j thru n and MM 4.2.1b as well as MM 4.6.1a thru MM 4.6.1g would also help with reducing operational emissions for both the proposed Project and Alternative 3. Although operational emissions would for Alternative 3 would be less than the proposed Project, the emissions would still exceed the significance threshold still be significant and unavoidable. On a cumulative level, Alternative 3's contribution to long-term GHG emissions would be less compared to the proposed Project because Alternative 3 would generate approximately sixteen percent (16%) of the total steady-state electrical usage needs by employing rooftop mounted solar panel installations on each building and future carports. Thus, a reduction in operational GHGs would occur as a result of the on-site solar electricity generation. Based on the overall amount of energy required for the four cultivation and manufacturing facilities, Alternative 3 would still result in a cumulative contribution to GHG above the significance threshold. However, Alternative 3's contribution would be approximately 16% lower than the proposed Project and therefore less in terms of contributing to cumulative GHGs.

Hazards and Hazardous Materials

Alternative 3 does not involve the use of large quantities of hazardous materials during construction or operation. The Project would use Samsung Lithium Ion batteries with nickel cobalt manganese chemistry. Lithium ion batteries can be prone to fire primarily if overcharged. The proposed battery energy storage system would be housed in two 7-foot by 12-foot self-contained cabinets. Multi-layer protection is built in to each battery cell. Safety features include the following outer casing components (terminal plate, cap-plate, seal pin, vent overcharge safety device) and internal components (fuse, vent separator, nail/screw safety device, safety function layer, positive polarity of cell housing, overcharge safety device) (ZGlobal 2018a). A fire suppressions system manufactured by 3M will also be incorporated as a safety feature. The system uses liquid which is clear and colorless with low odor to suppress fires. The liquid can cause irritation if it comes in contact with eyes or skin. If thermal decomposition occurs, it may be harmful if inhaled (ZGlobal 2018a).

The proposed battery energy storage system would be cooled with a heating ventilation and air conditioning (HVAC) system located internally in the containers. The size of the HVAC will be determined based on the final size of the battery energy storage system. The design of the battery energy storage system would be subject to review by the Calexico Fire Department.

Like the proposed Project, Alternative 3 would be equipped with four diesel generators (one at each cultivation and manufacturing facility) that would require occasional refueling which presents the possibility of leaks and spills. Mitigation measure MM 4.7.1 requires installation of features to reduce and avoid the potential for diesel leaks and spills. Impacts with regard to potential leaks and spills of hazardous materials during transport would be similar for both Alternative 3 and the proposed Project and could be reduced to less than significant with implementation of mitigation measure MM 4.7.1.

Transport of waste from the cultivation process is not considered hazardous as the residual material is void of any psychoactive properties or chemicals. Alternative 3 would produce the same amount of

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cultivation waste as the proposed Project. Alternative 3 would also create waste when batteries and/or solar panels are damaged or need to be replaced. As previously noted, the lithium ion batteries typically contain cobalt oxide, manganese dioxide, nickel oxide, carbon, electrolyte, and polyvinylidene fluoride. Only the electrolyte should be considered hazardous (inflammable and could react hazardously if mixed with water). The battery manufacturers typically assist with removal of affected equipment. The batteries will be transported/shipped in compliance with all applicable federal, state and local regulations addressing hazardous materials transport. Damaged or out of service panels requiring replacement would be removed and would be repurposed, recycled, or disposed of in accordance with all applicable waste disposal laws (EGI 2014).

No evidence of recognized environmental conditions of any kind was identified as part of the Phase I ESAs prepared for 2421 Enterprise Boulevard and Parcels 1, 2 and 3. Therefore, impacts associated with creating a hazard through reasonably foreseeable upset or release of hazardous materials is considered less than significant and exactly the same for both Alternative 3 and the proposed Project.

The Small World Montessori School at 450 Portico Boulevard is approximately 850 feet to the northeast of the northeast corner of 2421 Enterprise Boulevard. Like the proposed Project, each of the four cultivation and manufacturing buildings proposed as part of Alternative 3 would be outfitted with a “SKYPLUME” exhaust system to disburse odors by dilution with outside air at high speeds. This technology along with the distance from the School would result in a less than significant impact with regard to emitting hazards within one-quarter mile of a school. The battery storage system and solar panels proposed as part of Alternative 3 would also not emit any hazardous odors. Therefore, Alternative 3 and the proposed Project would result in similar less than significant impacts with regard to emitting hazards emissions within one-quarter mile of a school.

Alternative 3 would result in tenant improvements to the existing building at 2421 Enterprise Boulevard and construction on the vacant parcels. Four generators would be needed for each cultivation and manufacturing facility resulting in a similar potential for leaks and spills of diesel during refueling as the proposed Project. Although not considered a significant hazard, the same amount of waste and exhaust would be generated in association with both Alternative 3 and the proposed Project. No hazards are associated with the on-site solar facilities, although the battery storage systems could present some potential for hazard (explosion, fire) depending on composition. The exact technology has not been identified at this time. Therefore, cumulative hazards and hazardous materials impacts would be greater in association with Alternative 3 compared to the proposed Project.

Hydrology and Water Quality

Alternative 3 includes tenant improvements to 2421 Enterprise Boulevard, construction of three cultivation and manufacturing facilities and construction of the administration building, transportation office and guard house. In addition, Alternative 3 would develop rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. Approximately 6.23 acres of vacant land would be covered with pavement and buildings on Parcels 1, 2 and 3, including the proposed solar facilities. However, Alternative 3 would not add to the amount of impervious surfaces as the solar facilities would be developed on existing rooftops and as carports over paved parking lot areas.

As with the proposed Project, implementation of Alternative 3 would increase runoff during construction as well as during operation through the introduction of buildings and impervious surfaces. Pollutants would be introduced to the site that could be transported offsite in stormwater runoff. The battery energy storage system would be housed in two 7-foot by 12-foot self-contained cabinets and neither it nor the

solar panels are anticipated to generate pollutants aside from dust that would occasionally be washed off the panels. Mitigation measures MM 4.8.1a thru MM 4.8.1e would ensure that water quality standards or discharge requirements are not violated. Obtaining an NPDES permit (MM 4.8.1a), preparing a SWPPP and implementing BMPs (MM 4.8.1.b) would address possible off-site transport of pollutants during construction. During operation, implementation of the City Standard Stormwater Mitigation Plan (MM 4.8.1c), as well as containing any leakage from dumpsters (MM 4.8.1.d) and containing spilled diesel (MM 4.8.1e) would protect water quality. Therefore, impacts associated with violating water quality standards or waste discharge requirements would be similar and reduced to less than significant with mitigation for both Alternative 3 and the proposed Project.

Similar potentially significant erosion impacts would occur during construction of both Alternative 3 and the proposed Project as 6.23 acres of vacant land would be graded and disturbed. Mitigation measures MM 4.8.1a and MM 4.8.1b (described above) as well as MM 4.8.2 (which requires installation of erosion barriers and soil stabilizers) would reduce erosion impacts for both Alternative 3 and the proposed Project to less than significant.

Like the proposed Project, Alternative 3 would increase on-site runoff and contribute additional discharges to the City infrastructure and the IID drain system. However, the addition of a battery storage system and rooftop and carport solar facilities would not result in greater impervious surface or greater runoff than the proposed Project because the solar facilities are on top of buildings and above paved parking areas. The battery energy storage system would be located within the existing paved area and not increase the amount of impervious surface within the footprint of the Project. Based on the adequacy of existing storm drainage infrastructure, Alternative 3's potential to result in substantial flooding on- or off-site, or to create or contribute runoff exceeding capacity, is the same and the proposed Project and a less than significant impact.

Alternative 3 would add the same amount of impervious surfaces to the Project parcels resulting in the same runoff patterns and volumes as the proposed Project. As with the proposed Project, Alternative 3 would be required to obtain a General Industrial Permit and implement BMPs to control stormwater discharges. Therefore, Alternative 3's contribution to cumulative water quantity and quality impacts to the Salton Sea, IID's drainage system, and the New River are considered less than cumulative considerable and similar for both the Alternative 3 and the proposed Project.

Noise

The amount of facilities to be constructed for Alternative 3 is identical to the proposed Project with the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets.

While construction Alternative 3 would involve grading, delivery of materials, and other activities associated with building three new structures, installing solar panels and performing tenant improvements on the building at 2421 Enterprise Boulevard, noise levels would not exceed levels established in the City of Calexico Noise Ordinance. Construction noise levels would be similar and less than significant for both the Alternative 3 and the proposed Project.

Ground-borne vibration may occur for limited periods during construction of Alternative 3. However, no post pounding would be required to install any of the solar panels as they would be placed on building rooftops and carports. Thus, neither Alternative 3 or the proposed Project would generate long-term ground-borne vibration. The battery energy storage system would be housed in two 7-foot by 12-foot self-contained cabinets and is not expected to produce ground-borne vibration. Overall, ground-borne

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vibration levels associated with short-term construction and long-term operational activities would not exceed applicable ground-borne vibration criteria at nearby land uses for both Alternative 3 and the proposed Project. Thus, impacts regarding ground-borne vibration are considered similar and less than significant for both Alternative 3 and the proposed Project.

Operational noise for Alternative 3 would be similar to the levels produced by the proposed Project. Most of the battery energy storage system components will only operate during the daytime hours but a few may operate during nighttime or early morning hours (such as HVAC systems). Operation of the battery system will not generate noise. However, operation of HVAC equipment used to cool the batteries would generate noise. For example, ten 50-ton HVAC units operating simultaneously would have a combined noise level of 75 dBA at 23 feet (EGI 2016, p. 4.6-17). The size of the HVAC is not yet determined (Gonzalez, pers. comm., 2108). However, the HVAC for the battery energy storage system would be within the cabinets and would be much smaller in size than the example provided. The HVAC systems would not operate continuously, would be enclosed and setback from the property lines. Thus, noise levels are anticipated to be within the 75 dBA CNEL (Noise Element Policy 1e) threshold established as the acceptable outdoor noise exposure level industrial uses.

Other operational noise would include employee traffic and as well as the electrical motors used to power the "SKYPLUME" exhaust system at each of the four cultivation and manufacturing facilities. This noise is considered a potentially significant impact that would be mitigated with shielding around exhaust fans as prescribed in mitigation measure MM 4.9.3. As previously discussed, the noise generated by the HVAC system would be contained and is not anticipated to noticeably increase operational noise levels. Operational noise impacts from fans and motors can be mitigated to less than significant levels for both Alternative 3 and the proposed Project. Overall, impacts of operational noise would there be similar for both Alternative 3 and the proposed Project.

Temporary noise impacts from construction activities would result in an increase in the ambient noise level in the Project vicinity above levels existing without Alternative 3. The parcel on which 2421 Enterprise Boulevard (and the proposed parcel carve-out for the Transportation and Distribution Facility) is located is zoned Commercial Highway and would experience noise levels in excess of the City standards during construction. Similarly, the proposed Project includes three parcels within the Industrial zone. The City noise standard would be exceeded for several pieces of equipment during construction of the proposed Project. Alternative 3 involves slightly more construction compared to the proposed Project in association with installation of the battery energy storage system and construction of the rooftop and carport solar facilities. Construction of these features does not involve use of equipment not previously included in the list of construction equipment identified for the proposed Project. The proposed Project was determined to have a potentially significant impact with regard to a temporary or periodic increase in ambient noise levels. A similar potentially significant impact with regard to a temporary or periodic increase in ambient noise levels would occur for Alternative 3. Mitigation measure MM 4.9.4a would reduce operational noise levels by 5 dBA and MM 4.9.4b requires intermittent noise measurements to ensure City standards are not exceeded beyond allowable durations. These mitigation measures would reduce temporary increases in noise levels to levels in that comply with City noise standards. Therefore, temporary increases in noise levels would be similar for both Alternative 3 and the proposed Project.

Alternative 3 would result in the same amount of construction and operational noise as the proposed Project. Operation of the on-site solar facilities is not anticipated to result in an appreciable increase in operational noise. Therefore, cumulative noise impacts would be similar for both Alternative 3 and the proposed Project.

Public Services and Utilities

Fire Protection

Alternative 3 would result in development of the same facilities as the proposed Project with the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. Given the proximity of the Project parcels to Fire Station No. 2, as well as the proposed fire safety features (sprinklers and Fire Emergency Plan) that would be required by the Calexico Fire Department, there would not be a need for new or altered fire facilities and impacts would be less than significant for Alternative 3. Impacts for the proposed Project are also less than significant and would be similar in association with Alternative 3 given that the on-site solar facilities do not appreciable change fire protection demand.

Alternative 3 would result the same amount of buildings and employees requiring fire protection services with the addition of on-site solar facilities. The rooftop mounted solar panel installations on each of the four buildings and future carports are not considered flammable and the energy storage system would be in self-contained cabinets. The composition of the energy storage is not known at this time but some modes of storage (i.e. lithium ion batteries) can present a risk of fire or explosion if overheating occurs. The CFD would review the specifications for the energy storage prior to approval. Like the proposed Project, Alternative 3 and all cumulative projects are required to pay Development Impact Fees to offset the demand for increased fire services. Because Alternative 3 would include an unknown energy storage technology, cumulative impacts to CFD services would be greater for Alternative 3 compared to the proposed Project.

Law Enforcement

Alternative 3 would result in development of the same facilities as the proposed Project with the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. 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 Alternative 3, impacts to law enforcement services are considered less than significant. Impacts for the proposed Project are also less than significant and would be similar for Alternative 3 given that the on-site solar facilities are not anticipated to increase demand for law enforcement services.

Alternative 3 would result in the same amount of development and employees as the proposed Project with the addition of on-site solar facilities. Like the proposed Project, Alternative 3 would be reviewed by the CPD to ensure that all potential security issues are addressed. In addition, Alternative 3 would be required to pay the Development Impact Fee to offset impacts to law enforcement services. Because Alternative 3 would have the same amount of square footage and employees as the proposed Project, cumulative impacts to CPD services would be similar for both Alternative 2 and the proposed Project given that the on-site solar facilities are not anticipated to increase demand for law enforcement services.

Water Service

Alternative 3 would result in development of the same facilities as the proposed Project with the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. Alternative 3 would require

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virtually the same amount of construction and operational water as the proposed Project. The Project area is already served by water lines and no increase in distribution or water supply would be needed to serve Alternative 3. Thus, impacts to water distribution and supply are less than significant and similar for both Alternative 3 and the proposed Project.

Alternative 3 would result a similar water demand compared to the proposed Project based on the same level of development (4 buildings/353,480 sq. ft./78 employees). While not specified, operational water demand may be slightly greater if the on-site solar panels proposed as part of Alternative 3 require washing. When considered cumulatively with the other projects, the water demand of either the proposed Project or Alternative 3 would not exceed the capacity of the existing water distribution system nor result in the need for new water supply entitlements. However, Alternative 3 may require more water compared to the proposed Project if panel washing is necessary. Therefore, cumulative water distribution and water supply impacts are considered greater and therefore slightly greater for Alternative 3 compared to the proposed Project.

Wastewater

Alternative 3 would result in development of the same facilities as the proposed Project with the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. Alternative 23 and the surrounding area is currently served by several sewer lines. The City's wastewater system has adequate conveyance and treatment capacity to provide wastewater service to Alternative 3 and no increase in wastewater generation would occur in association with the on-site solar facilities. Thus, impacts to wastewater conveyance and treatment are less than significant and similar for both Alternative 3 and the proposed Project.

Alternative 3 would generate the same amount of wastewater as the proposed Project based on the same level of development (4 buildings/353,480 sq. ft./78 employees). The on-site solar facilities included as part of Alternative 3 would not generate any wastewater. 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. Alternative 3 would generate the same amount of wastewater requiring conveyance and treatment as the proposed Project. Therefore, cumulative wastewater conveyance and treatment impacts are considered similar for both the Alternative 3 and the proposed Project.

Solid Waste

Alternative 3 would result in development of the same facilities as the proposed Project with the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. The Imperial Landfill has sufficient permitted capacity to accommodate solid waste generated by construction and operation of the Alternative 3 and no increase in solid waste generation would occur in association with the on-site solar facilities. Thus, impacts to solid waste are similar and less than significant for both Alternative 3 and the proposed Project.

As with the proposed Project, Alternative 3 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 and similar impact is identified with regard to compliance with federal, state and local statutes and regulations related to solid waste for both Alternative 3 and the proposed Project.

Alternative 3 would result in cumulative demand for solid waste service and landfill capacity similar to the proposed Project. No additional waste is anticipated to be generated in association with the on-site solar facilities. Therefore, cumulative impacts to solid waste service and landfill capacity would be similar for both Alternative 3 and the proposed Project.

Electricity

Alternative 3 would result in development of the same facilities as the proposed Project with the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. Alternative 3 would require the same energy demand of 12.63 MW as the proposed Project. However, 3 will self-generate approximately 1.5 MW or sixteen percent (16%) of the total steady-state electrical usage needs by employing rooftop mounted solar panel installations on each building and future carports. In addition, Alternative 3 includes advanced energy storage technology (i.e. a battery energy storage system) which combined with on-site solar generation will negate the need to augment the IID electrical infrastructure (e.g., build a new substation). Therefore, impacts to electricity would be less in association with Alternative 3 compared to the proposed Project.

Implementation of Alternative 3 would result in an increase in demand for electricity identical to the proposed Project. Because the IID does not have adequate capacity to serve Alternative 3 with existing facilities, Alternative 3 includes rooftop mounted solar panel installations on each of the four buildings and future carports as well as an energy storage system. The inclusion of on-site solar facilities as part of Alternative 3 would eliminate the need for IID to construct a new substation to serve Alternative 3. Therefore, cumulative impacts to electrical service are less in association with Alternative 3 compared to the proposed Project.

Transportation and Circulation

Alternative 3 would add short-term construction traffic and long-term operational traffic associated with 75 employee trips (plus 3 employees for Transportation and Distribution Facility) and two weekly trips to distribute product for each of the four cultivation and manufacturing facilities. The traffic analysis determined that the proposed Project would add traffic to existing traffic volumes on West Cole Boulevard during construction and operation. The segment of West Cole Boulevard from Enterprise Boulevard to SR 111 would operate at LOS A with the addition of Project traffic. As a result, conflicts with the General Plan Circulation Element and impacts to LOS standards would be less than significant with the addition of Project traffic. Compared to the proposed Project, Alternative 3 would result in a few more short-term traffic trips associated with delivery of materials for the battery energy storage system and solar panels. Long-term traffic volumes are anticipated to be the same as the proposed Project aside from an occasional trip to service or replace the batteries and solar panels. Therefore, Alternative 3 would also result in similar and less than significant impacts to LOS.

As with the proposed Project, Alternative 3 would include the construction of a three new access points off of Sunset Boulevard and one off of West Cole Boulevard. These access points will be required to be designed per all applicable City Standards. No new access points to a Caltrans facility are proposed. Because the proposed Project is not anticipated to substantially increase hazards due to a design feature, impacts are considered less than significant. Similarly, no impact would occur with regard to increasing hazards due to a design feature for Alternative 3.

Alternative 3 would result in implementation of the same amount of development as the proposed Project with the addition on-site solar facilities. Thus, Alternative 3 would add slightly higher construction traffic (in association with delivery and installation of the on-site solar facilities) and similar operational traffic to

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the segment West Cole Boulevard between Enterprise Boulevard and SR 111 as well as the intersections along this segment compared to the proposed Project. While the segment has adequate capacity remaining before it reaches LOS D and the intersections are currently above LOS C, conflicts with the General Plan Circulation Element and impacts to LOS standards would be similar for both Alternative 3 and the proposed Project.

Energy

The amount of facilities to be constructed for Alternative 3 is identical to the proposed Project with the addition of rooftop mounted solar panel installations on each of the four buildings and future carports to be constructed in the parking areas adjacent to Buildings A, B, C and D. Alternative 3 also includes an energy storage system consisting of two 7-foot by 12-foot self-contained cabinets. Alternative 3 would involve the use of energy and gasoline during construction as well as during operation. Impacts with regard to wasteful, inefficient, and unnecessary consumption of energy were considered less than significant for the proposed Project. Because Alternative 3 includes on-site solar facilities that will self-generate approximately 1.5 MW or sixteen percent (16%) of the total steady-state electrical usage needs by employing rooftop mounted solar panel installations on each building and future carports, impacts with regard to wasteful, inefficient, and unnecessary consumption of energy would also be less than significant and less in association with Alternative 3 compared to the proposed Project.

6.4.4 ALTERNATIVE 4 – NO PROJECT ALTERNATIVE

Under the No Project Alternative, the proposed Trinity Cannabis Cultivation and Manufacturing Facility would not be developed. No Uniform Application or Developer Agreement would be approved. The Project parcels would remain in its existing condition as vacant land and an existing building at 2421 Enterprise Boulevard. Under this alternative, the Applicant(s) would sell the vacant land and likely the building. The No Project Alternative would not develop 2421 Enterprise Boulevard and the Project parcels with the proposed Cannabis Cultivation and Manufacturing Facility there by forgoing creation of approximately 78 long-term jobs and more than \$1,000,000 per year in anticipated tax revenue to the City of Calexico projected to be generated by the Project at full buildout and operation.

Relationship to Project Objectives

Implementation of the No Project Alternative would result the existing building at 2421 Enterprise Boulevard remaining vacant and the existing parcels left undeveloped. Implementation of the No Project Alternative would not fulfill any of of the Project’s objectives and forfeit creation of jobs and tax revenue that would otherwise occur in association with implementation of the proposed Project.

Comparative Impacts

Alternative 4 would result would not undertake tenant improvements at the existing building at 2421 Enterprise Boulevard or construct three new cultivation and manufacturing facilities. In addition, a Lot Line Adjustment and parcel carve-out would not be undertaken to accommodate the Transportation and Distribution Facility. Likewise, a 2,200 sq. ft. administration building, 1,056 transportation office and 323 sq. ft. guard house would not be constructed. A discussion of comparative impacts by resource area is provided below comparing Alternative 4 to the proposed Project.

Land Use

Alternative 4 would forego tenant improvements at 2421 Enterprise Boulevard, creation of a parcel carve-out, and construction of any new buildings. The Project parcels would remain zoned Industrial and Commercial Highway. Alternative 4 would not result in any construction or other changes with regard to land use and zoning. Like the proposed Project, Alternative 4 is consistent with the General Plan land use

designation of Industrial, existing zoning of Industrial and Commercial Highway, and is within the COZ overlay zone. Alternative 4 is not within any compatibility zones of the Calexico International Airport. Thus, potential for conflicts with an applicable land use plan, policy, or regulation is considered less than significant and similar for Alternative 4 and the proposed Project with the only difference being that no new development would occur. Likewise, cumulative conflicts with applicable land use plans, policies and regulations would be similar and less than significant for both Alternative 4 and the proposed Project because projects within the City of Calexico must be consistent with General Plan Land Use designation and Zoning.

Air Quality

Alternative 4 would not involve any disturbance of vacant land, tenant improvements to 2421 Enterprise Boulevard or construction of the transportation office, administration building and guard house. Alternative 4, would not produce any construction or operational emissions and would not contribute to localized pollutant concentrations that could exceed applicable air quality standards and possibly conflict with or obstruct implementation of an air quality plan. In comparison to the proposed Project, Alternative 4 would avoid generation of emissions resulting in less impacts with regard to air standards.

Alternative 4 would also avoid generation of operational emissions that could contribute on a cumulative basis to localized and/or regional air quality impacts compared to the proposed Project. While this impact is considered potentially significant, Alternative 4 would be less compared to the proposed Project and no mitigation measures would be needed to reduce short-term construction emission impacts and long-term operational emissions.

Based on the elimination of disturbance and construction activities, Alternative 4 would result in less impacts compared to the proposed Project with regard to exposing sensitive receptors to substantial pollutant concentrations. While the proposed Project would result in less than significant impacts with regard to creating objectionable odors affecting a substantial number of people based on the incorporation of the SKYPLUME exhaust system and the Odor Control Plan, Alternative 4 would completely eliminate generation of odors resulting in less impacts in this regard. Alternative 4 would result in a smaller amount of operational emissions that could contribute, on a cumulative basis, to localized and/or regional air quality impacts compared to the proposed Project. Thus, cumulative impacts with regard to violation of an air quality standard would be less for Alternative 4 compared to the proposed Project.

Biological Resources

Alternative 4 would not disturb any land area or require the removal of disturbed habitat and Big Saltbush scrub currently located the vacant land that comprises Parcels 1, 2 and 3. Impacts to candidate, sensitive, or special status species would be avoided in association with Alternative 4 compared to the proposed Project. Vegetation on the vacant parcels as well as landscape and ornamental vegetation surrounding 2421 Enterprise Boulevard could have potential nesting habitat for raptors and other birds. Thus, impacts would be less for Alternative 4 compared to the proposed Project with regard to impacting nesting and migratory birds as no construction would occur. Mitigation measures MM 4.3.2a and MM 4.3.2b would reduce potential impacts to nesting and migratory birds by limiting vegetation removal to non-breeding season or requiring a pre-construction nesting bird survey for the proposed Project but would not be needed for Alternative 4. The Project parcels do not contain sensitive habitat nor were any special status species observed during the Biological Resources Survey. However, no disturbance of vacant land or tenant improvements to 2421 Enterprise Boulevard would occur in association with Alternative 4. Therefore, cumulative impacts to biological resources (candidate, sensitive, or special status species and nesting and migratory birds) are less under Alternative 4 compared to the proposed Project.

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Cultural and Paleontological Resources

Alternative 4 would avoid disturbance of the Project parcels. While no historical resources are present that could be impacted by the proposed Project, Alternative 4 would eliminate disturbance entirely. Impacts to unrecorded subsurface archaeological resources, buried fossil remains, or human remains if present would be potentially significant for the proposed Project but avoided and less for Alternative 4. Mitigation measures have been identified to address impacts to unrecorded subsurface archaeological resources, buried fossil remains, or human remains if present. These would not be required for Alternative 4 as the elimination of construction would avoid impacts to historical, archaeological and paleontological resources and human remains compared to the proposed Project. Furthermore, impacts to unrecorded subsurface archaeological resources, buried fossil remains, or human remains if present would be avoided under Alternative 4. Therefore, impacts to unrecorded subsurface archaeological resources, buried fossil remains, or human remains would be less under Alternative 4 compared to the proposed Project. Unlike the proposed Project, Alternative 4 would not require disturbance of vacant land. Thus, Alternative 4 would have no potential to impact unknown historical, archaeological and paleontological resources and human remains compared to the proposed Project. Likewise, on a cumulative level, Alternative 4 would result in less cumulative impacts to historical, archaeological and paleontological resources and human remains compared to the proposed Project.

Geology and Soils

Alternative 4 would avoid tenant improvements of 2421 Enterprise Boulevard as well as disturbance of approximately 6.23 acres of vacant land. All facilities proposed as part of proposed Project are located in a seismically active area and have the potential to be exposed to strong ground shaking during an earthquake along several faults. Mitigation measure MM 4.5.1 would reduce potential structural damage caused by strong seismic ground shaking by adhering to and enforcing the appropriate provisions of the 2016 CBC, ASCE 7-10 Seismic Parameters and CBC as appropriate. However, this mitigation would not be needed for Alternative 4 as no structures would be constructed that could be exposed to seismic ground shaking. Therefore, Alternative 4 would result in less impact with regard to strong seismic groundshaking.

The existing building at 2421 Enterprise Boulevard has already been constructed and engineered to address the soils on which it is located and no tenant improvements would be undertaken in association with Alternative 4. Likewise, no new buildings included as part of the proposed Project would be located on soils classified as silty clay and clay. While the hazard of erosion on these soils is considered low, Alternative 4 would avoid exposure of structures to liquefaction, seismic settlement, expansive soils and corrosive soils. These potential impacts could be mitigated for the proposed Project but mitigation would not be necessary for Alternative 4. Because Alternative 4 would completely avoid exposure to the geologic and soil hazards identified for the proposed Project, impacts are less for Alternative 4 compared to the proposed Project. Unlike the proposed Project, Alternative 4 would not perform tenant improvements to 2421 Enterprise Boulevard or implement any new construction. Thus, compared to the proposed Project Alternative 4 would not expose people or structures to seismic hazards such as groundshaking, liquefaction/seismic settlement, erosion, expansive soils, and soil corrosivity. Likewise, on a cumulative level, Alternative 4 would result in less cumulative geology and soils impacts than the proposed Project by completely avoiding tenant improvements and new construction.

Climate Change

Alternative 4 would not produce short-term construction-generated GHGs compared to the proposed Project as there would be no tenant improvements at 2421 Enterprise Boulevard or construction of the three cultivation and manufacturing facilities, the Transportation and Distribution Facility with 2,200 sq.

ft. administration building, 1,056 transportation office and 323 sq. ft. guard house. Long-term operational emissions would also be eliminated in association with Alternative 4 based on the existing building remaining vacant and no new construction being undertaken. Alternative 4 would avoid significant and unavoidable impacts associated with the proposed Project and would therefore result in less impacts by eliminating operational emissions. On a cumulative level, Alternative 4 would avoid any short-term or long-term contributions to GHG. Thus, Alternative 4 would not contribute to cumulative GHGs or exceed the significance threshold thereby resulting in less impact to GHGs compared to the proposed Project.

Hazards and Hazardous Materials

Alternative 4 would avoid the use of any hazardous materials as no construction or operation would occur. No diesel generators that would require occasional refueling which presents the possibility of leaks and spills would be located on the Project parcels. Thus, impacts with regard to potential leaks and spills of hazardous materials during transport would be eliminated for Alternative 4 compared to the proposed Project. While waste from the cultivation process does not contain psychoactive properties or harmful chemical residues, Alternative 4 would eliminate the need for transfer of such waste compared to the proposed Project.

No evidence of recognized environmental conditions of any kind was identified as part of the Phase I ESAs prepared for 2421 Enterprise Boulevard and Parcels 1, 2 and 3. Therefore, impacts associated with creating a hazard through reasonably foreseeable upset or release of hazardous materials is considered less than significant and similar for both Alternative 4 and the proposed Project.

The Small World Montessori School at 450 Portico Boulevard is approximately 850 feet to the northeast of the northeast corner of 2421 Enterprise Boulevard. No odors would be produced in association with Alternative 4. While the proposed Project is outfitted with the "SKYPLUME" exhaust system to disburse odors by dilution with outside air at high speeds, Alternative 4 would not generate any odors and therefore result in less impacts than the proposed Project with regard to emitting hazards emissions within one-quarter mile of a school.

None of the Project parcels had existing RECs and Alternative 4 would result in the existing building at 2421 Enterprise Boulevard remaining vacant with no new constructions. No cultivation and manufacturing would take place and no sources of hazardous materials would be stored or transported to and from the Project parcels. Therefore, cumulative hazards and hazardous materials impacts would be less in association with Alternative 4 compared to the proposed Project.

Hydrology and Water Quality

Under Alternative 4 no changes to the existing building at 2421 Enterprise Boulevard would be undertaken and 6.23 acres of vacant land would remain undeveloped and free of pervious surfaces. In contrast to the proposed Project, implementation of Alternative 4 would have no impact on runoff during construction or operation as no buildings and impervious surfaces would be introduced to the Project parcels. No pollutants would be introduced to the site that could be transported offsite in stormwater runoff. Under Alternative 4, it would not be necessary to obtain an NPDES permit, prepare a SWPPP or implement BMPs to address possible off-site transport of pollutants during construction. No operations would occur in association with Alternative 4 and potential impacts such as containing leakage from dumpsters and spilled diesel would not be necessary. Therefore, impacts associated with violating water quality standards or waste discharge requirements would be less under Alternative 4 compared to the proposed Project.

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Erosion impacts would be avoided under Alternative 4 as no construction would occur and 6.23 acres of vacant land would remain undisturbed. Thus, erosion impacts would be less in association with Alternative 4 compared to the proposed Project.

Unlike the proposed Project, Alternative 4 would not increase on-site runoff or contribute additional discharges to the City infrastructure and the IID drain system. Thus, Alternative 4's potential to result in substantial flooding on- or off-site, or to create or contribute runoff exceeding capacity would be avoided and result in less impacts compared to the proposed Project.

Alternative 4 would not add any impervious surfaces to the Project parcels allowing for greater infiltration and less runoff compared to the proposed Project. Alternative 4 would not be required to obtain a General Industrial Permit or implement BMPs to control stormwater discharges. Overall, Alternative 4 would result in less cumulative impacts to hydrology and water quality compared to the proposed Project.

Noise

Alternative 4 would result in conditions at 2421 Enterprise Boulevard and the Project parcels remaining unchanged. No construction noise such as grading, delivery of materials, and other activities associated with building three new structures and performing tenant improvements on the building at 2421 Enterprise Boulevard would occur. Therefore, short-term noise impacts under Alternative 4 would be less compared to the proposed Project.

Ground-borne vibration during construction would be completely avoided under Alternative 4 as no construction would take place. Thus, impacts regarding ground-borne vibration are considered less and under Alternative 2 compared to the proposed Project.

Alternative 4 would not generate any operational noise as 2421 Enterprise Boulevard would remain unoccupied and the Project parcels would remain vacant and undeveloped. While mitigation measure MM 4.9.3 would reduce noise generated by the exhaust fans proposed as part of the Project, no mitigation would be needed for Alternative 4. Thus, impacts of operational noise would be eliminated and therefore less for Alternative 4 compared to the proposed Project.

Alternative 4 eliminates the need for construction on the Project parcels and any temporary increase in noise resulting from construction. As such, a significant impact with regard to a temporary or periodic increase in ambient noise levels would be avoided and no mitigation measures would be needed as would occur in association with construction of the proposed Project. Therefore, temporary increases in noise levels would be less for Alternative 4 compared to the proposed Project.

Alternative 4 would result in no new development on the Project parcels and no tenant improvements to 2421 Enterprise Boulevard. As no construction or operational noise would be generated in association with Alternative 4, cumulative noise impacts would be less compared to the proposed Project.

Public Services and Utilities

Fire Protection

Under Alternative 4, the existing building at 2421 Enterprise Boulevard would not undergo tenant improvements nor would the three cannabis cultivation and manufacturing facilities, the 1,056-sq. ft. Transportation Office, 2,200 sq. ft. administration building, a 323 sq. ft. guard house be constructed. No additional demand for fire protection services would be created beyond existing conditions as a result of implementing Alternative 4. While impacts to fire protection for the proposed Project are less than significant, no impact would occur in association with Alternative 4 given that there would be no

additional buildings or employees requiring fire protection compared to the proposed Project. Impacts to fire protection would therefore be less for Alternative 4 compared to the proposed Project.

Alternative 4 would not construct any new buildings on the Project parcels and no tenant improvements would be made to 2421 Enterprise Boulevard. As no Project would occur, no Development Impact Fees would be necessary. The Project parcels present a fire hazard if unmaintained vegetation overgrowth occurs. Therefore, cumulative impacts to CFD services would be considered greater in association with vacant land that would remain under Alternative 4 compared to the proposed Project.

Law Enforcement

Under Alternative 4, the existing building at 2421 Enterprise Boulevard would not undergo tenant improvements nor would the three cannabis cultivation and manufacturing facilities, the 1,056-sq. ft. Transportation Office, 2,200 sq. ft. administration building, a 323 sq. ft. guard house be constructed. No additional demand for law enforcement would be created beyond existing conditions as a result of implementing Alternative 4. While impacts to law enforcement for the proposed Project are less than significant, no impact would occur in association with Alternative 4 given that there would be no additional buildings for the cultivation and manufacture of cannabis requiring law enforcement compared to the proposed Project. Impacts to law enforcement would therefore be less for Alternative 4 compared to the proposed Project.

Alternative 4 would not construct any new buildings on the Project parcels and no tenant improvements would be made to 2421 Enterprise Boulevard. As no Project would occur, no Development Impact Fees would be necessary. The Project parcels present the potential for dumping, vandalism and squatters if unmaintained vegetation overgrowth occurs. Therefore, cumulative impacts to CPD services would be considered greater in association with vacant land that would remain under Alternative 4 compared to the proposed Project.

Water Service

Alternative 4 would not create an increase in demand for water compared to the proposed Project as no cannabis cultivation and manufacturing would occur. As with the proposed Project, the Project area is already served by water lines and no increase in distribution or water supply would be needed to serve Alternative 4. However, Alternative 4 would not require any water whereas the proposed Project would have a total daily demand of 5,655 GPD. While impacts to water distribution and supply for the proposed Project are less than significant, under Alternative 4 impacts would be completely avoided when compared to the proposed Project. Therefore, impacts to water supply and distribution are less for Alternative 4 compared to the proposed Project.

Alternative 4 would not generate any water demand as no development would occur under this alternative. When considered cumulatively with the other projects, Alternative 4 would add no additional demand for water supply or distribution. Therefore, cumulative water distribution and water supply impacts are considered less in association with Alternative 4 compared to the proposed Project.

Wastewater Service

The proposed Project would generate a total of 1,612 GPD of wastewater from both the cultivation and manufacturing process as well as employee wastewater. In contrast, Alternative 4 would not create an increase in wastewater as no cannabis cultivation and manufacturing or employee wastewater would be generated. While impacts to wastewater conveyance and treatment are less than significant for the proposed Project given the adequacy of existing infrastructure, no impacts would occur under Alternative

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4. As no wastewater would be generated in association with Alternative 4, impacts to wastewater conveyance and treatment would be less under Alternative 4 compared to the proposed Project.

Alternative 4 would not generate any wastewater as no development would occur under this alternative. When considered cumulatively with the other projects, Alternative 4 would add no additional demand for wastewater conveyance or treatment. Therefore, cumulative water distribution and water supply impacts are considered less in association with Alternative 4 compared to the proposed Project.

Solid Waste

The proposed Project would generate waste from the cultivation and manufacturing process. In contrast, Alternative 4 would not generate any waste. The Imperial Landfill has sufficient permitted capacity to accommodate solid waste generated by construction and operation of the proposed Project. However, impacts to solid waste generation and landfill capacity would be completely avoided under Alternative 4 given that no waste would be generated and no landfill capacity would be used. Therefore, impacts to solid waste service and landfill capacity would be less in association with Alternative 4 compared to the proposed Project.

No solid waste would be generated in association with Alternative 4. Thus, Alternative 4 would not require pick-up service or affect landfill capacity. Therefore, cumulative impacts to solid waste service and landfill capacity would be less and therefore less in association with Alternative 4 compared to the proposed Project.

Electricity

Under Alternative 4, the existing building at 2421 Enterprise Boulevard would not undergo tenant improvements nor would the three cannabis cultivation and manufacturing facilities, the 1,056-sq. ft. Transportation Office, 2,200 sq. ft. administration building, a 323 sq. ft. guard house be constructed. Because the no development would occur, there would be no increased demand for electricity of 12.63 MW. Thus, Alternative 4 would avoid impacts to IID electrical service and a new substation would not be required to serve Phase 2 as would occur in association with implementation of the proposed Project. The increase in electrical demand and the expansion of existing infrastructure to serve the proposed Project is considered a potentially significant impact that would be avoided under Alternative 4. Therefore, impacts to electricity would be less in association with Alternative 4 compared to the proposed Project.

Implementation of Alternative 4 would not generate any increase in demand for electricity as the Project would not be implemented. IID capacity would not be impacted and a new substation would not be needed. Therefore, cumulative impacts to electrical service are considered less in association with Alternative 4 compared to the proposed Project.

Transportation and Circulation

Alternative 4 would not add short-term construction traffic or long-term operational traffic to West Cole Boulevard. Existing traffic volumes LOS would remain unchanged under Alternative 4. Therefore, impacts to LOS would be completely avoided and therefore less in association with Alternative 4 compared to the proposed Project.

The proposed Project would construct new access points in accordance with City standards to avoid substantially increasing a hazard due to a design feature. In contrast, no new access points off of Sunset Boulevard or West Cole Boulevard would be required for Alternative 4 as there would be no new buildings requiring ingress and egress. Thus, impacts relative to increasing a hazard due to a design feature would be completely eliminated and therefore less in association with Alternative 4 compared to the proposed Project.

Alternative 4 would result in no new construction and no tenant improvements at 2421 Enterprise Boulevard. Thus, Alternative 4 would not add any construction or operational traffic to the segment West Cole Boulevard between Enterprise Boulevard and SR 111 as well as the intersections along this segment compared to the proposed Project. While the segment has adequate capacity remaining before it reaches LOS D and the intersections are currently above LOS C, conflicts with the General Plan Circulation Element and impacts to LOS standards would not occur and would therefore be less in association with Alternative 4 compared to the proposed Project.

Energy

Alternative 4 would not avoid the need for any additional energy consumption and use of gasoline as the proposed Project would not be constructed or operated. Therefore, impacts with regard to wasteful, inefficient, and unnecessary consumption of energy would be less in association with Alternative 4 compared to the proposed Project.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based upon the evaluation described in this section, the No Project Alternative (Alternative 4) is considered to be the environmentally superior alternative as it would avoid all adverse impacts associated with the proposed Project. The No Project Alternative was determined to have less adverse environmental impacts than the proposed Project on most issues overall assuming that no tenant improvements to 2421 Enterprise Boulevard are undertaken and the Project parcels remain undeveloped.

Under CEQA Guidelines Section 15126.6 (e)(2), if the environmentally superior alternative is the No Project Alternative, another environmentally superior alternative must be selected from the other alternatives analyzed. After the No Project Alternative, the alternative with the least potential impacts would be Alternative 1 (2421 Enterprise Boulevard with Transportation and Distribution Facility). When compared to the proposed Project, this alternative resulted in 43 impacts that would be less (including lower GHGs) than would occur in association with implementation of the proposed Project. However, although lower GHGs would be generated for Alternative 1 compared to the proposed Project, the impact of operational GHG emissions would still remain significant and unavoidable. No impacts were considered greater for Alternative 1 compared to the proposed Project. Therefore, Alternative 1 would be the environmentally superior alternative.

Table 6.0-1, below, provides a summary of the potential impacts of the alternatives evaluated in this section, as compared with the potential impacts of the proposed Project.

**TABLE 6.0-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT**

Impact	Alternative 1 2421 Enterprise Boulevard with Transportation and Distribution Facility	Alternative 2 Aluminum Reactors Energy Alternative	Alternative 3 Site Solar Power Alternative	Alternative 4 No Project Alternative
Impact 4.1.1 Conflict With Any Applicable Land Use Plan, Policy, or Regulation	S	S	S	L
Impact 4.1.2 Cumulative Conflicts with Applicable Land Use Plans, Policies, or Regulations	S	S	S	L
Impact 4.2.1 Conflict with or Obstruct Air Quality Plan/Violate Air Quality Standard	L	L	L	L
Impact 4.2.2 Result in a Cumulatively Considerable Net Increase of Any Criteria Pollutant	L	L	L	L
Impact 4.2.3 Expose Sensitive Receptors to Substantial Pollutant Concentrations	L	S	S	L
Impact 4.2.4 Create Objectionable Odors Affecting a Substantial Number of People	S	S	S	L
Impact 4.2.5 Violate Air Quality Standard/Cause Air Quality Violation	L	S	S	L
Impact 4.3.1 Impacts to Candidate, Sensitive, or Special Status Species	L	S	S	L
Impact 4.3.2 Impacts to Nesting and Migratory Birds	S	S	S	L
Impact 4.3.3 Cumulative Impacts to Biological Resources (Candidate, Sensitive, or Special Status Species and Nesting and Migratory Birds)	L	S	S	L
Impact 4.4.1 Impacts to Historical Resources	L	S	S	L
Impact 4.4.2 Impacts to Unknown Subsurface Archaeological Resources	L	S	S	L
Impact 4.4.3 Impacts to Nonrenewable Fossil (Paleontological) Remains	L	S	S	L
Impact 4.4.4 Impacts to Subsurface Human Remains	L	S	S	L
Impact 4.4.5 Cumulative Impacts to Historical, Archaeological and Paleontological Resources and Human Remains	L	S	S	L
Impact 4.5.1 Strong Seismic Ground Shaking	L	S	S	L
Impact 4.5.2 Liquefaction/Seismic Settlement	L	S	S	L

**TABLE 6.0-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT**

Impact	Alternative 1 2421 Enterprise Boulevard with Transportation and Distribution Facility	Alternative 2 Aluminum Reactors Energy Alternative	Alternative 3 Site Solar Power Alternative	Alternative 4 No Project Alternative
Impact 4.5.3 Erosion	L	S	S	L
Impact 4.5.4 Expansive Soils	L	S	S	L
Impact 4.5.5 Soil Corrosivity	L	S	S	L
Impact 4.5.6 Cumulative Geology and Soils Impacts	L	S	S	L
Impact 4.6.1 Generation of GHG Emissions/Conflict with Applicable Plan, Policy or Regulation Reducing GHGs	L	S	L	L
Impact 4.7.1 Hazardous Materials Transport, Use, Disposal and Accidental Release	S	S	S	L
Impact 4.7.2 Create a Hazard Through Reasonably Foreseeable Upset/Release of Hazardous Materials	S	S	S	L
Impact 4.7.3 Emit Hazardous Emissions within One-Quarter Mile of a School	S	S	S	L
Impact 4.7.4 Cumulative Hazards and Hazardous Materials Impact	L	S	G	S
Impact 4.8.1 Violate Water Quality Standards or Waste Discharge Requirements	L	S	S	L
Impact 4.8.2 Result in Substantial Erosion or Siltation On- or Off-Site	L	S	S	L
Impact 4.8.3 Result in Substantial Flooding On- or Off-Site/Create or Contribute Runoff Exceeding Capacity	L	S	S	L
Impact 4.8.4 Cumulative Impact to Hydrology and Water Quality	G	S	S	L
Impact 4.9.1 Exposure to, or Generation of, Noise Levels in Excess of Standards	L	S	S	L
Impact 4.9.2 Excessive Ground-Borne Vibration or Ground-Borne Noise Levels	S	S	S	L
Impact 4.9.3 Substantial Permanent Increase in Ambient Noise Levels	L	S	S	L

6.0 ALTERNATIVES

**TABLE 6.0-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT**

Impact	Alternative 1 2421 Enterprise Boulevard with Transportation and Distribution Facility	Alternative 2 Aluminum Reactors Energy Alternative	Alternative 3 Site Solar Power Alternative	Alternative 4 No Project Alternative
Impact 4.9.4 Substantial Temporary or Periodic Increase in Ambient Noise Levels	L	S	S	L
Impact 4.9.5 Contribution to Cumulative Noise Levels	L	S	S	L
Impact 4.10.1 Impacts to Fire Protection Services	L	S	S	L
Impact 4.10.2 Cumulative Impacts to City of Calexico Fire Department Services	L	S	G	G
Impact 4.10.3 Impacts to Law Enforcement Services	L	S	S	G
Impact 4.10.4 Cumulative Impacts to City of Calexico Services	L	S	S	L
Impact 4.10.5 Water Distribution and Supply	L	S	S	L
Impact 4.10.6 Cumulative Water Distribution and Water Supply Impacts	L	S	G	L
Impact 4.10.7 Wastewater Treatment and Conveyance Infrastructure Impacts	L	S	S	L
Impact 4.10.8 Cumulative Wastewater Treatment and Conveyance Infrastructure Impacts	L	S	S	L
Impact 4.10.9 Impacts to Solid Waste Service and Landfill Capacity	L	S	S	L
Impact 4.10.10 Compliance with Federal, State, and Local Statutes and Regulations Related to Solid Waste	S	S	S	L
Impact 4.10.11 Cumulative Impacts to Solid Waste Service and Landfill Capacity	L	S	S	L
Impact 4.10.12 Impacts to Electrical Service and Infrastructure	L	L	L	L
Impact 4.10.13 Cumulative Impacts to Electric Service	L	L	L	L
Impact 4.11.1 Conflict with an Applicable Plan/Level of Service Standard (Existing Year 2018 Conditions)	S	S	S	L
Impact 4.11.2 Substantially Increase Hazards Due to a Design Feature	L	S	S	L
Impact 4.11.3 Cumulative Conflicts to Applicable Plan/Level of Service Standard	L	S	S	L

**TABLE 6.0-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT**

Impact	Alternative 1 2421 Enterprise Boulevard with Transportation and Distribution Facility	Alternative 2 Aluminum Reactors Energy Alternative	Alternative 3 Site Solar Power Alternative	Alternative 4 No Project Alternative
Impact 7.0.1 Cumulative Conflicts to Applicable Plan/Level of Service Standard	L	L	L	L
Impact 7.0.2 Contribution to Cumulative Energy Usage	L	L	L	L

Notes: S = Similar Impact compared to the Proposed Project

L = Less Impact compared to the Proposed Project

G = Greater Impact compared to the Proposed Project.

6.0 ALTERNATIVES

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