

memo berkeley

to PLANNING COMMUNICATIONS

from Southisone S. Garner, Planner

re Appeal UPC18-0055: 2599 Laughlin Road Centralized Processing Facility

date 06/16/2021

At the May 25, 2021 Board of Supervisors hearing on an appeal of the Board of Zoning Adjustments decision to approve a 4,200 square feet (SF) centralized processing facility at 2599 Laughlin Road in Windsor. The Board requested additional information about the proposed security and project related traffic. This memorandum responds to that request.

Security:

Commercial cannabis uses, including processing facilities, are permitted only in compliance with Sonoma County Code sections 26-88-250 through 26-88-256. Sonoma Municipal Code Section 26-88-254 (f)(21) states:

“Security and Fencing. A site security plan shall be required. All site security plans shall be held in a confidential file, exempt from disclosure as a public record pursuant to Government Code Section 6255(a). Security cameras shall be motion-sensor and be installed with capability to record activity beneath the canopy but shall not be visible from surrounding parcels and shall not be pointed at or recording activity on surrounding parcels. Surveillance video shall be kept for a minimum of thirty (30) days. Video must use standard industry format to support criminal investigations. Lighting and alarms shall be installed to insure the safety of persons and to protect the premises from theft... Weapons and firearms at the cultivation site are prohibited. Security measures shall be designed to ensure emergency access in compliance with fire safe standards.”

The applicant proposes to implement a security plan that includes:

- An alarm system (refer to “Alarm System” discussed below);
- surveillance cameras (operating 24 hours a day, 7 days a week) that will store footage for a minimum of 30 days;
- On-site security;
- Access control mechanisms such as access codes and key cards that will allow access onto the site and into the facility (refer to “Access Controls” discussed below);
- Operations that include a set of safety and security procedures that include training for staff (see “Safety and Security Procedures” discussed below);
- Motion activated security lighting; and
- Cashless operations (cash transactions will not occur on-site and no cash will be stored on-site).

Consistent with the Sonoma County code, all employees will be 21 years and older, a surveillance system with lighting will be installed and footage retained for a minimum of 30 days, there will be no weapons or firearms located on site and the parcel is currently fenced along the property lines.

Additionally, Condition of Approval #17 requires an annual report of incidents to be submitted to the County by January 31 of each year of the permit term.

Safety and Security Procedures

The applicant proposes to establish a Security Team that will include the Compliance Officer, Owner, and Facility Manager. Collectively they would ensure that all staff at the facility receive ongoing training in "Safety and Security Procedures," a set of practices and behaviors designed to keep the facility safe, prevent breaches of security and respond to emergencies. Training would include written materials for review, in person instruction and multi-tiered remote assistance. The Security Team is responsible for ensuring that all staff and contractors uphold Security Procedures and other operational security measures. Staff recommends a possible condition that these trainings be held for the farmworkers who reside on the site as well.

These procedures and trainings will center on active observation and reporting. During onboarding of new staff, the safety and security plan proposes to train and regularly update the safety and security plan to ensure current conditions and concerns are addressed.

Alarm System

The applicant proposes to install a centrally monitored alarm system to detect any unauthorized entry. This system would be always armed and in use when personnel are not present.

The system includes:

- Infrared motion sensors
- Auxiliary power system
- Secured all weather "Hoffman box" enclosure for all sensitive electronics.
- Contact strips on access gates

A total of 8 cameras will be installed in and around the facility and one at the entrance of the site along the private access drive. The cameras will be placed to allow visible recordings around:

- Entry and exits to property
- Entry and exits to facility
- Processing areas
- Storage areas
- Staging/ transfer areas
- Disposal/ destruction areas

- Any other limited access area

Access Control

The subject site currently has perimeter fencing and the private entrance is currently gated. The project proposes to retain the perimeter fencing and install an access control gate. Access to any part of the subject site and the facility is restricted to authorized personnel. It would be the responsibility of all staff and contractors to observe and enforce restrictions on access to the site. Any persons entering the subject site would need to be met at the secured gate at the entrance of the site, off of Laughlin Road. Authorized personnel and visitors would wear an identification badge issued by the facility and be escorted by a member of the Security Team. The Security Team would maintain a log, as stating in the condition of approvals, containing name, agency or state issued identification number, date of visit, and purpose of visit for any authorized person entering the facility. The log shall also document any attempted entry by an unauthorized person, including a complete incident report.

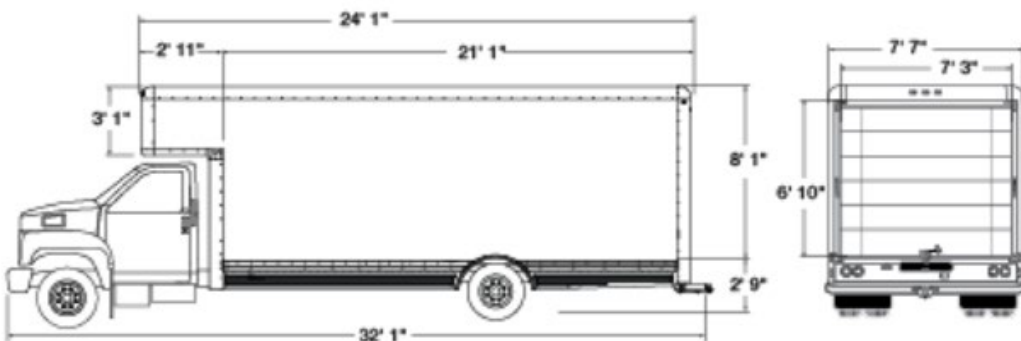
Traffic and Trucks:

Staff has expanded the discussion of truck and circulation issues to clarify the size and volume of the trucks that will be used to transport cultivated cannabis onto the subject site and trucks that will be used to transport processed cannabis off-site.

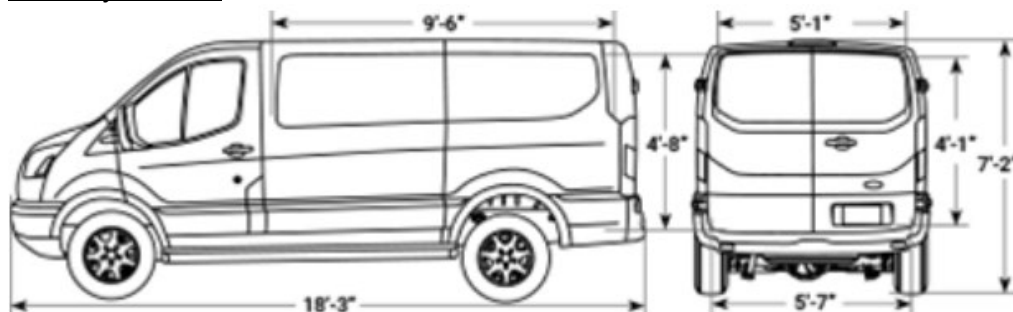
Truck Specifications

The largest vehicle transporting plants to the processing facility will be a 24-foot box truck (see figures below).

Box Truck



Delivery Vehicle



Volume

Cannabis is harvested by cutting down the entire plant, cutting the plant to 24-inch lengths and loading into a plastic tote. Each tote averages 20 pounds of total weight. One delivery load is approximately 300 totes. The facility reaches capacity at 60,000 pounds of harvested product or an estimated maximum of 15 deliveries per harvest.

Average Daily Trips

8-10 vehicles, total, will deliver cannabis product to the facility for processing across a 2–3-week harvest period in October. This equates to a maximum of 1.5 Average Daily Trips (ADTs) across the 14 days or 2 weeks and a minimum of 0.76 ADT across 21 days or 3 weeks.

Congestion on Laughlin Road, specifically, the one-lane bridge that crosses Mark West Creek, was cited as a concern during the hearing. According to the Department of Transportation and Public Works Traffic Volume mapping tool Laughlin Road has approximately 2,500 ADTs where it passes the intersection with River Road. At the one-lane bridge that crosses Mark West Creek, the mapping tool recorded approximately 2,600 ADTs. Therefore, the estimated 1.5 truck ADT from the proposal would increase the use of Laughlin Road by 0.06%.

Accuracy of Project Estimates

Neighbors have expressed concern that the 180 truck trips per year estimated by the applicant understates the actual traffic the project will generate. Staff has compared the estimated truck traffic for this project with a recently approved centralized processing facility (UPC19-0002) that is 20,000 SF in size.

A traffic impact study prepared for UPC19-0002 included a trip generation analysis. The study used the standard calculation method of multiplying the number of employees by the standard industry rate for the average daily trips.

“As is the case with all standard trip generation rates, although employees are the independent variable, trips generated by all aspects of the use are included, so trips associated with deliveries, visitors, shipments, and other activities are reflected in the rate and resulting trip estimates. [emphasis added]”

| Project Number | Processing Facility Size | Units | Rate* | Daily Trips during Harvest |
|----------------|--------------------------|--------|-------|----------------------------|
| UPC19-0002 | 20,000 sq. ft. | 17 emp | 3.05 | 52 |
| UPC18-0055 | 4,200 sq. ft. | 3 emp | 3.05 | 9.15 |

*Cannabis processing uses is classified as a “General Light Industrial” use (Land Use #110) from the Trip Generation Manual, 10th Edition, 2017, published by the Institute of Transportation Engineers (ITE), a respected and accepted industry standard.

The facility approved for UPC19-0002 is approximately 80% larger than the proposed project, yet the traffic engineer estimated it would only generate 18% more trips than the applicant estimates for this project. Though many factors may influence differences in trip generation, the 180 truck trips and the average daily trips of 9.5 reported on the Trip Generation Form estimated for this project likely overstates the actual traffic based on a comparison of these facilities.

Recommendation:

Staff recommends that the Board of Supervisors denies the appeal and upholds the Board of Zoning Adjustment's approval of the project.