

STAFF REPORT TO THE PLANNING COMMISSION

DATE: Regular Meeting of May 19, 2021

SUBMITTED BY: Kevin Scudero, Associate Planner

APPROVED BY: Forrest Ebbs, Community Development Director *FE for FE*

SUBJECT: **Radix Growth Cannabis Facility**
(UP-20-10, V-20-02, AR-20-12)

RECOMMENDED ACTION

It is recommended that the Planning Commission adopt the resolution recommending that the City Council **APPROVE** a Use Permit, Variance and Design Review application (UP-20-10, V-20-02, AR-20-16) for a cannabis facility with indoor cultivation, distribution, non-volatile manufacturing, and retail dispensary with delivery.

DISCUSSION

Requested Approvals

Hans Benson requests a use permit, variance and design review approval to operate a cannabis facility with indoor cultivation, distribution, non-volatile manufacturing, and retail dispensary with delivery within an existing +/- 94,338 square foot building. The variance is required because the project site is within 600 feet of a residentially zoned property. Design review is requested to make minor exterior changes. The project site is located at 3625 East 18th Street (APN: 051-052-094).



Environmental

This project has been determined to be Categorically Exempt from the provisions of CEQA, pursuant to Section 15301 – Class 1 (Existing Facilities), because the cannabis business will occupy space within an existing commercial building and involves negligible expansion of the use.

Background

With the passage of Proposition 64 in November of 2016, California residents over the age of 21 can legally use marijuana without a medicinal card if not in a public place. Californians can carry and use up to one ounce of marijuana and grow up to six plants for personal use. Recreational sales of marijuana did not go into effect until January 1, 2018. The possession, sale and distribution of cannabis is now legal under California State law, subject to provisions contained in the law, including a state licensing requirement.

On May 2, 2018 the Planning Commission recommended to the City Council approval of an Ordinance amending Title 9, Chapter 5 of the Antioch Municipal Code, thereby creating new provisions for the consideration of cannabis businesses in the City of Antioch. The City Council introduced the ordinance on May 22, 2018 and approved the ordinance on June 26, 2018. The ordinance went into effect on July 26, 2018. The Code Amendment established new definitions, imposed basic standards, and created a new Cannabis Business (CB) Zoning Overlay District. Within the CB Zoning Overlay District, a party may apply for a Use Permit from the City Council for the establishment of a

Cannabis Business. Unlike the typical use permit process, a cannabis use permit must be reviewed by the City Council after a recommendation by the Planning Commission.

On September 11, 2018 the Antioch City Council adopted Cannabis Guidelines by approval of Resolution No. 2018/117. The purpose of the guidelines is to provide the public and potential applicants with the City of Antioch's general expectations relating to the design and operation of a Cannabis Business.

On October 27, 2020, the Antioch City Council adopted Amendments to the Cannabis Business Ordinance by approval of Ordinance No. 2191-C-S. The purpose of the amendments was to provide a definition of Commercial Cannabis Use, replace the requirement for a development agreement with a requirement for an operating agreement, and specifying the minimum conditions of an operating agreement.

ANALYSIS

Project Overview

The applicant proposes to operate a cannabis facility at 3625 East 18th Street in an existing +/- 95,420 square foot commercial building that was previously a K-Mart store. The cannabis facility will consist of indoor cultivation, distribution, non-volatile manufacturing and a retail dispensary with delivery.

The proposed cultivation operation will take place completely indoors and consist of 87 flower rooms that will occupy 47,715 square feet of floor space, however the cultivation will be a two-tier grow and therefore the total cannabis cultivation area will be 95,340 square feet. The cultivation operation will work in three shifts: 5am-2pm, 9am-6pm and 1pm-10pm. The applicant estimates that 50 total employees will be a part of this operation. The cultivation licenses will consist of 10 Type 2A Small indoor licenses. Each Type 2A Small indoor license allows up to 10,000 square feet of mature canopy area.

The cultivation operation will also have an A-Type 4 Nursery license in order to allow the propagation of immature cannabis plants. The nursery area will only produce clones, immature plants, seeds, and other agricultural products used specifically for the propagation and cultivation of cannabis. Once the immature cannabis plant is ready to flower, it will be transported within the facility to the identified mature canopy area within one of the 10 Type 2A Small indoor licenses. The Nursery license itself does allow for the sale of the immature cannabis plants to other state of California licensed farms, however, under this proposed project Radix Growth will not be selling or distributing cannabis from the Nursery license. The intention of this Nursery license is to begin the growth of seedlings before planting them within the mature area.

The proposed manufacturing and distribution operation will be located at the northern end of the building and will occupy approximately 7,785 square feet. The manufacturing operation will operate in identical shifts to the cultivation operation and the applicant

estimates that 40 total employees will be a part of this operation. The manufacturing operation will be conducted under a type 6 manufacturing license which allows for non-volatile manufacturing. Non-volatile manufacturing uses a mechanical extraction method or non-volatile solvents, such as carbon dioxide, ethanol, water, or cooking oils, to extract cannabis oils. The distribution operation will operate under a type 11 distribution license. A licensed distributor is responsible for: transporting cannabis goods, arranging for the testing of cannabis products, conducting quality assurance reviews of cannabis goods to ensure that they comply with all of the packaging and labeling requirements, and transporting cannabis goods between licensees.

The proposed retail operation will take place in the southern portion of the building near the existing storefront entrance. The retail operation will be seven days a week from 8am to 8pm and the applicant estimates that 10 total employees will be a part of this operation. The retail operation will occupy an approximately 1,625 square foot floor area and can only be accessed by customers presenting a valid identification to a security guard. The applicant is not proposing to sell any cannabis paraphernalia at this time. Staff has added a condition of approval that any future sales of paraphernalia shall be subject to the review and approval of the Zoning Administrator. The applicant estimates that no more than four delivery vans will be used for delivery. The delivery vehicles will have no markings or indications on the exterior that would indicate cannabis goods are being delivered.

Project plans, detailed description of the business, and neighborhood responsibility plan are included as Attachments B, C and D, respectively, to the staff report.

General Plan, Zoning, and Land Use

The site is located within the General Plan's Eastern Waterfront Employment Focus Area and is designated as Regional Commercial. The zoning of the site is Regional Commercial (C-3) and Cannabis Overlay District (CB). Cannabis uses are allowed in the Cannabis Overlay District subject to the approval of a use permit by the City Council.

The surrounding land uses and zoning designations are noted below:

North:	Self Storage Facility / Heavy Industrial (M-2)
South:	Gas Station / Regional Commercial (C-3) & Cannabis Overlay (CB)
East:	State Route 4
West:	Vacant Land / Planned Development (PD)

Site Plan and Design Review

The site is approximately 7.38 acres in size with an approximately 94,338 square foot building located at the northern portion of the site. The site can be accessed via a signalized intersection on East 18th Street as well as three access driveways along Drive-In Way. The project site was originally developed as a K-mart shopping center and has cross access parking and common area maintenance agreements with the adjacent

commercial parcels. The parking lot has approximately 430 parking spaces which is more than sufficient to support the proposed use.

The applicant is proposing minor exterior modifications that include the installation of security fencing and building signage. The security fencing is being proposed at the northwest and southeast corners of the existing building. The installation of the security fencing will provide a secure delivery area at the rear of the building that can only be accessed after showing proper identification to the security guard on site. Staff has added a condition of approval that the security fencing be wrought iron or tubular steel. The proposed building signage is proposed within the same footprint that the previous K-Mart signage occupied. Detailed signage plans will be required at building permit submittal.

In addition to the exterior modifications the applicant has proposed, staff is recommending that additional exterior improvements be required. Upon inspection of the site, staff observed faded and mismatched paint as well as damaged stucco and tile on the building façade. Staff also observed parking lot landscaping that was in need of replacement and rehabilitation as well as faded parking lot striping and asphalt in need of repair. Staff has added conditions of approval requiring a minor design review application be submitted showing new paint and façade improvements subject to the review and approval of the Zoning Administrator. Staff has also added a condition of approval requiring that all common area landscaping that this property is responsible for maintaining be replaced and rehabilitated and that a revised landscaping plan for the site be submitted. Staff has also included a condition of approval that all common area drive aisles and parking areas this property is responsible for maintaining be re-striped and slurry-sealed, and all on-site painted curb be repainted.

Site Security

As part of their application the applicant submitted a security plan for the site. The security plan addressed the following issues:

- Physical elements of the site such as location of the building, outdoor lighting, and parking areas.
- Electronic security such as controlled access areas and surveillance cameras.
- Compliance and procedures such as inventory management, cash handling, and employee training.
- On site physical security services related to the number of physical security guards present at the site.

The Antioch Police Department attended a preliminary application meeting where they communicated their expectations for the security plan for this facility to the applicant. Upon submittal of the formal application the security plan was reviewed by the Antioch Police Department. The Police Department recommended that the security plan explicitly state that a minimum of two uniformed and armed security guards be on-site during all

hours of retail operation and/or delivery and a minimum of one uniformed and armed security guard be on-site after hours. Staff has included this recommendation as a condition of approval in the attached resolution.

Staff has also included a condition in the attached resolution requiring the Antioch Police Department to conduct a site inspection to assess the security of the site prior to a certificate of occupancy being issued for the site. Any changes that the Antioch Police Department deem necessary upon site inspection will be incorporated into a revised site security plan that will then be submitted for their review and approval. No certificate of occupancy will be issued without final approval of a site security plan by the Antioch Police Department. In addition to the security inspection prior to issuance of certificate of occupancy, the business is required to submit to annual security audits conducted by a third party or City staff.

Operational Issues

The applicant has submitted an odor mitigation plan that discusses the measures they will take to ensure that cannabis odors will not be detected at or beyond the site. Staff had the applicant's odor mitigation plan peer reviewed by the Engineering firm Blair, Church, & Flynn to ensure that the odor mitigation plan was adequate for the size and type of facility. Staff has taken Blair, Church, & Flynn's recommendations regarding the odor mitigation plans and added them as recommended conditions of approval. Once building permits are submitted for the project, the plans will be reviewed for compliance with the recommended odor mitigation measures. Staff has also included a condition of approval requiring that adequate on-site odor control measures are maintained at all times and that cannabis odors cannot be readily detected outside the structures in which the business operates.

Staff has also included a condition of approval addressing site management and requiring the cannabis business operator to take "reasonable steps" to discourage and address objectionable conditions that constitute a nuisance in parking areas, sidewalks, and areas surrounding the premises during business hours if directly related to patrons of the business. Staff has also included a condition of approval prohibiting the smoking or ingestion of cannabis products on-site.

Variance

Variances are intended to resolve practical difficulties or physical hardships. Each zoning classification has specific development standards which projects must meet, such as setbacks or parking requirements. There are occasions, however, when the strict application of such standards may be inappropriate because of special characteristics of the property or area. The variance procedure is designed to permit minor adjustments to the zoning regulations when there are special or extraordinary circumstances that apply to a parcel of land or a building that prevent the property from being used to the extent intended by the zoning.

The Antioch Municipal Code requires that Cannabis Businesses be located a minimum of 600 feet from any residentially zoned property. The proposed project site is a large shopping center parcel with a parking field that is shared by the entire center. The southernmost property line of the project site is approximately 360 feet from the nearest residentially zoned property but the actual building where the Cannabis Business will be conducted is over 700 feet from the nearest residentially zoned property. The Antioch Cannabis Guidelines state that the separation should be measured from the furthest extent of the Cannabis Business operation, which in this case would be the building. However, since State Law requires the separation to be measured from property line to property line a variance is required.

In order to grant a variance, four findings must be made (Antioch Municipal Code Section 9-5.2703). If an application can meet all four of the findings, then the variance can be granted. Conversely, if any one of the findings cannot be made, the variance should be denied.

The four findings and their applicability to the variance request for a reduction in the 600 foot setback requirement are as follows:

- 1. That there are exceptional or extraordinary circumstances or conditions applicable to the property involved, or to the intended use of the property, that do not apply generally to the property or class of use in the same zone or vicinity.**

The intended use of the property is commercial zoning and was specifically included in the Cannabis Overlay district to allow for operation of a Cannabis Business. The exceptional circumstance for this property is that the parcel includes parking that is shared by the entire shopping center. There is a recorded reciprocal easement for all 5 parcels within the shopping center to allow parking for all the businesses. The project parcel is being held to the setback standards for a parking lot that is not solely being used by the project parcel.

- 2. That the granting of such variance will not be materially detrimental to the public health or welfare or injurious to the property or improvements in such zone or vicinity.**

Granting the variance would not be detrimental to the public health or welfare because the use of the cannabis facility exceeds the 600 foot setback requirement. Even if the property boundary line were to shift to meet the setback requirement the same result would occur since the parking lot is shared among all parcels in the shopping center.

- 3. That because of special circumstances applicable to the subject property, including size, shape, topography, location, or surroundings, the strict**

application of the zoning provisions is found to deprive the subject property of privileges enjoyed by other properties in the vicinity under the identical zone classifications.

Due to the shape of the property boundary to include the shared parking lot, the project parcel is within the 600 foot setback. The project sites business operations meet the setback requirements. Due to the strict interpretation of the 600 foot setback being applied from the edge of the cannabis property to the edge of the residential property, the property would be deprived of its intended use outlined in the General Plan.

- 4. That the granting of such variance will not adversely affect the comprehensive General Plan.**

The proposed use of the project site is consistent with the General Plan and Cannabis Business overlay zoning district. The applicant's request would not adversely affect the comprehensive General Plan.

ATTACHMENTS

- A. Resolution
- B. Project Plans
- C. Project Description
- D. Neighborhood Responsibility Plan
- E. Fire District Comment Letter

ATTACHMENT A

Resolution

**PLANNING COMMISSION
RESOLUTION NO. 2021-****

**RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF ANTIOCH
RECOMMENDING THE CITY COUNCIL APPROVE THE USE PERMIT, VARIANCE
AND DESIGN REVIEW (UP-20-10, V-20-02, AR-20-12) FOR A CANNABIS FACILITY
WITH INDOOR CULTIVATION, DISTRIBUTION, NON-VOLATILE MANUFACTURING
AND RETAIL DISPENSARY WITH DELIVERY AT 3625 EAST 18TH STREET**

WHEREAS, Hans Benson requests approval of a use permit, variance and design review to operate a cannabis facility with indoor cultivation, distribution, non-volatile manufacturing, and retail dispensary with delivery at 3625 East 18th Street (APN: 051-052-094);

WHEREAS, this project is Categorically Exempt from the provisions of CEQA, pursuant to section 15301;

WHEREAS, the Planning Commission duly gave notice of public hearing as required by law; and

WHEREAS, the Planning Commission on May 19, 2021, duly held a public hearing, received and considered evidence, both oral and documentary.

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission does hereby make the following findings for recommendation to the City Council for approval of a Cannabis Business Use Permit:

1. The granting of such Use Permit will not be detrimental to the public health or welfare or injurious to the property or improvements in such zone or vicinity.

The proposed cannabis business is required to comply with multiple conditions of approval that address the project's impact on public health and the properties in the vicinity. On-site armed security is required at all times. Annual audits of the site security plan by City staff or a third-party company subject to the approval of the Antioch Police Department are required. The business shall also maintain on-site odor control so that cannabis related odors are not readily detected outside the structure. Based upon the conditions imposed, the cannabis business will not create adverse impacts to the surrounding area.

2. The use applied at the location indicated is properly one for which a Use Permit is authorized.

The site is zoned Cannabis Overlay District. The Cannabis Overlay District allows cannabis businesses with the approval of a use permit.

3. The site for the proposed use is adequate in size and shape to accommodate such use, and all parking, and other features required.

The proposed cannabis business will take place in an existing commercial building with ample parking. The site has a secure area for cannabis deliveries.

4. That the site abuts streets and highways adequate in width and pavement type to carry the kind of traffic generated by the proposed use.

The project site is currently developed and is located on East 18th Street and Drive-in Way, which are adequate in width and pavement type to carry the traffic generated by the proposed use.

5. The granting of such Use Permit will not adversely affect the comprehensive General Plan.

The use will not adversely affect the comprehensive General Plan because the project is consistent with the General Plan designation for the site of Regional Commercial.

6. That the location and site characteristics of the proposed cannabis business are consistent with all applicable State laws and City standards or guidelines, that all provisions have been made to ensure that the operation of the cannabis business will not create excessive demands for police service or other public services, and that the cannabis business will benefit the City of Antioch.

The conditions of approval on the project are consistent with the cannabis guidelines. The security plan has been reviewed by the Antioch Police Department and security conditions have been included per their direction. The sales taxes generated by the sale of cannabis will provide a financial benefit to the City of Antioch. The forthcoming operating agreement will likely include additional revenue based on sales from the business.

BE IT FURTHER RESOLVED that the Planning Commission does hereby make the following findings for the approval of a Variance from the required 600-foot setback from residential property:

1. That there are exceptional or extraordinary circumstances or conditions applicable to the property involved, or to the intended use of the property, that do not apply generally to the property or class of use in the same zone or vicinity.

The intended use of the property is commercial zoning and was specifically included to allow for Cannabis Business. The exceptional circumstance for this property is that the parcel includes parking that is shared by the entire shopping

center. There is a recorded reciprocal easement for all 5 parcels within the shopping center to allow parking for all the businesses. The project parcel is being held to the setback standards for a parking lot that is not solely being used by the project parcel.

2. That the granting of such variance will not be materially detrimental to the public health or welfare or injurious to the property or improvements in such zone or vicinity.

Granting the variance would not be detrimental to the public health or welfare because the use of the cannabis facility exceeds the 600 foot setback requirement. Even if the property boundary line were to shift to meet the setback requirement the same result would occur since the parking lot is shared among all parcels in the shopping center.

3. That because of special circumstances applicable to the subject property, including size, shape, topography, location, or surroundings, the strict application of the zoning provisions is found to deprive the subject property of privileges enjoyed by other properties in the vicinity under the identical zone classifications.

Due to the shape of the property boundary to include the shared parking lot, the project parcel is within the 600-foot setback. The project sites business operations meet the setback requirements. Due to the strict interpretation of the 600-foot setback being applied from the edge of the cannabis property to the edge of the residential property, the property would be deprived of its intended use outlined in the General Plan.

3. That the granting of such variance will not adversely affect the comprehensive General Plan.

The proposed use of the project site is consistent with the General Plan and Cannabis Business overlay zoning district. The applicant's request would not adversely affect the comprehensive General Plan.

NOW, THEREFORE, BE IT FURTHER RESOLVED that the Planning Commission of the City of Antioch does hereby recommend that the City Council **APPROVE** the use permit, variance and design review application (UP-20-10, V-20-02, AR-20-12) to operate a cannabis facility with indoor cultivation, distribution, non-volatile manufacturing, and retail dispensary with delivery at 3625 East 18th Street (APN: 051-052-094) subject to the following conditions:

A. GENERAL CONDITIONS

1. The project shall comply with the Antioch Municipal Code. All construction shall conform to the requirements of the California Building Code and City of Antioch standards.
2. The applicant shall defend, indemnify, and hold harmless the City in any action brought by a third party to challenge the land use entitlement. In addition, if there is any referendum or other election action to contest or overturn these approvals, the applicant shall either withdraw the application or pay all City costs for such an election.
3. The project shall be implemented as indicated on the application form and accompanying materials provided to the City and in compliance with the Antioch Municipal Code, or as amended by the Planning Commission or City Council.
4. No building permit will be issued unless the plan conforms to the project description and materials as approved by the City Council and the standards of the City.
5. This approval expires two years from the date of approval by the Planning Commission (May 19, 2023), unless an extension has been approved by the Zoning Administrator. Requests for extensions must be received in writing with the appropriate fees prior to the expiration of this approval. No more than one one-year extension shall be granted.
6. No permits or approvals, whether discretionary or ministerial, shall be considered if the applicant is not current on fees, reimbursement payments, and any other payments that are due.
7. City staff shall inspect the site for compliance with conditions of approval prior to the issuance of a Certificate of Occupancy or commencement of the business.
8. The applicant shall obtain an encroachment permit for all work to be done within the public right-of-way.

B. CONSTRUCTION CONDITIONS

1. The use of construction equipment shall comply with AMC § 5-17.04 and 5-17.05, or as approved in writing by the City Manager.
2. The project shall be in compliance with and supply all the necessary documentation for AMC § 6-3.2: Construction and Demolition Debris Recycling.

3. Building permits shall be secured for all proposed construction associated with this facility, including any interior improvements not expressly evident on the plans submitted.
4. Standard dust control methods shall be used to stabilize the dust generated by construction activities.

C. AGENCY REQUIREMENTS

1. All requirements of the Contra Costa County Fire Protection District shall be met.

D. FEES

1. The applicant shall pay all City fees which have been established by the City Council and as required by the Antioch Municipal Code.
2. The applicant shall pay all required fees at the time of building permit issuance.

E. PROPERTY MAINTENANCE

1. No illegal signs, pennants, banners, balloons, flags, or streamers shall be used on this site at any time.
2. The site shall be kept clean of all debris (boxes, junk, garbage, etc.) at all times.

F. PROJECT-SPECIFIC REQUIREMENTS

1. This use permit approval applies to the operation of a cannabis facility as depicted on the project plans and application materials submitted to the Community Development Department. Any forthcoming plans submitted for any purpose shall be entirely consistent with these received plans and application materials and conditions of approval herein.
2. The hours of operation for the retail dispensary shall be from 8:00 AM – 8:00 PM.
3. The hours of operation for the cultivation, manufacturing and distribution operation shall be from 5:00 AM- 10:00 PM
4. Any change to the hours of operation shall be subject to the review and approval of the Zoning Administrator.
5. Four delivery vehicles shall be permitted. Any additional vehicles shall be subject to the review and approval of the Zoning Administrator.

6. All persons entering the business must be at least 21 years of age with a valid identification card. An electronic reader shall be used to read and validate identification cards.
7. The dispensary's lobby shall be secured from the retail area. A customer entering the retail area shall be buzzed through a locked door into the retail area by a security guard or employee.
8. All necessary licenses from the State of California shall be obtained prior to opening.
9. No smoking or ingestion of cannabis products on-site is allowed.
10. No free samples of cannabis products are allowed.
11. No drive-through, drive-up or walk-up windows are allowed.
12. All cannabis cultivation shall be conducted within a fully enclosed space.
13. The cultivation of cannabis shall be conducted in accordance with all applicable federal, state, and local laws and regulations governing the use of pesticides.
14. Cannabis related waste shall be stored and secured in a manner that prevents diversion, theft, loss, hazards and nuisance.
15. The operator shall take reasonable steps to discourage and correct objectionable conditions that constitute a nuisance in parking areas, sidewalks and areas surrounding the premises during business hours if directly related to patrons of the business.
16. A copy of this use permit and City of Antioch business license, as well as any other State licenses, shall be on display during business hours and in a conspicuous place so that they may be readily seen by all persons entering the facility.
17. No signs, tinting, or other graphic material may be used to obscure the storefront windows.
18. No fewer than two uniformed and armed security guards who are employed by a Private Patrol Operator (Security Company) who is currently licensed with the California Department of Consumer Affairs shall be on-site during the hours of retail operation and/or delivery. One armed security guard shall be on-site at all times, even when the facility is closed. A copy of the contract with the Security Company shall be provided to the Community Development Director and City Attorney for review and approval prior to issuance of a certificate of occupancy.

19. The name of the Security Company, proof of liability insurance including a copy of all exceptions, their State license number, and the guard registration numbers for the employed guards shall be provided to the Community Development Department and City Attorney. Should there be a change in the security private patrol operator or in the liability insurance of the applicant, the Community Development Director and City Attorney shall be notified within 5 business days.
20. The City Council may require modification, discontinuance or revocation of this use permit if it finds that the use is operated or maintained in a manner that it:
 - Adversely affects the health, peace or safety of persons living or working in the surrounding area; or
 - Contributes to a public nuisance; or
 - Has resulted in excessive nuisance activities including disturbances of the peace, illegal drug activity, diversion of Cannabis or Cannabis Products, public intoxication, smoking in public, harassment of passersby, littering, or obstruction of any street, sidewalk or public way; or
 - Has resulted in or has been the target of criminal activity requiring undue attention and dedication of the Antioch Police Department resources; or
 - Violates any provision of Antioch Municipal Code or condition imposed by a City issued permit, or violates any provision of any other local, state, regulation, or order including those of state law or violates any condition imposed by permits or licenses issued in compliance with those laws.
 - Results in more than three distinct unresolved odor complaints in a twelve (12) month period.
21. The business shall incorporate and maintain adequate on-site odor control measures in such a manner that the odors of cannabis and cannabis-related products shall not be readily detected from outside of the structure in which the business operates or from other non-Cannabis businesses adjacent to the site.
22. The Odor Mitigation Plan shall be updated and resubmitted to the Planning Division to address the comments from the February 19, 2021 Odor Mitigation Plan Review Memorandum:
 - The applicant shall provide a certification statement by a Certified Professional Engineer or Certified Industrial Hygienist for the project site.
 - The applicant shall provide an Operation and Maintenance plan that includes inspection frequency and maintenance of odor mitigation controls.

- The applicant shall provide a document detailing staff training procedures for inspections and maintenance of odor mitigation controls.
 - The applicant shall provide calculations for carbon filter number and sizing, fan number and sizing, and other critical components, and provide certified statement confirming calculations were reviewed.
23. During regular business hours, all cannabis business premises shall be accessible, upon request, to an authorized City employee or representative for random and/or unannounced inspections. The cannabis business may be charged a fee for any inspections.
 24. An annual audit of the site's security plan shall be submitted to the Antioch Police Department. The audit shall be conducted by City staff or a third-party company subject to the approval of the Antioch Police Department.
 25. Any modifications to the site security plan shall be subject to the review and approval of the Chief of Police or his designee.
 26. All points of ingress and egress to the business shall be secured with Building Code compliant commercial-grade, non-residential door locks and/or window locks. Entry and exit doors to restricted cannabis areas shall be made of reinforced metal with metal frames and have a security lock system.
 27. Building signage shall not state that cannabis or cannabis products are stored, sold or handled on the site. Images of cannabis leaves, green crosses, or similar commonly identifiable graphics are not allowed. All building signage shall be subject to staff review and approval.
 28. At building permit submittal, an updated photometric plan shall be provided that shows a minimum two-foot candles in all shared parking areas for the site. Any additional parking lot lighting necessary to meet this requirement shall be architecturally compatible with the existing parking lot lighting and shown on the building permit submittal.
 29. A minor design review application shall be submitted showing new paint and façade improvements to the building prior to building permit submittal.
 30. All common area landscaping the project site is responsible for maintaining shall be rehabilitated and replaced as necessary. A revised landscaping plan for the site shall be submitted with the building permit submittal.
 31. All common area drive aisles and parking areas the project site is responsible for maintaining shall be slurry sealed and restriped and all painted curb shall be repainted to the satisfaction of the City Engineer.

32. The trash enclosure on site shall be modified to meet the requirements of AMC section 9-5.1401 Refuse Storage Area Design Guidelines.
33. All delivery of cannabis to the site and loading of vehicles with cannabis shall take place in a caged/gated delivery area with a dedicated armed security guard to be present during all deliveries.
34. Visible signage shall be placed at the entrance of the facility notifying the public of surveillance on site.
35. Prior to a certificate of occupancy being issued for the site, the Antioch Police Department shall conduct a site inspection to assess the security of the site. Any changes the Antioch Police Department deems necessary upon site inspection shall be incorporated into a revised site security plan that is then submitted for their review and approval. No certificate of occupancy will be issued without final approval of a site security plan by the Antioch Police Department.
36. Security measures shall be designed to ensure emergency access is provided to the Antioch Police Department and the Contra Costa Fire Department for all areas on the premises in case of an emergency.
37. Security surveillance cameras shall be installed and maintained in good working order to provide coverage on a twenty-four (24) hour real-time basis of all internal and external areas of the site where cannabis is stored, transferred and dispensed, where any money is handled, and all parking areas. The cameras shall be oriented in a manner that provides clear and certain identification of all individuals within those areas. Cameras shall remain active at all times and be capable of operating under any lighting condition. Security video must use standard industry format to support criminal investigations and shall be maintained for a minimum of sixty (60) days.
38. A professionally monitored security alarm system shall be installed and maintained in good working condition. The alarm system shall include sensors to detect entry exit from all secure areas and all windows. The name and contact information of the alarm system installation and monitoring company shall be kept as part of the onsite books and records.
39. A local contact who will be responsible for addressing security and safety issues shall be provided to, and kept current with, the Antioch Police Department.
40. The applicant shall enter into an operating agreement with the City of Antioch prior to a certificate of occupancy being issued for the site. No business license shall be issued without an approved operating agreement.

* * * * *

I HEREBY CERTIFY the foregoing resolution was duly adopted by the Planning Commission of the City of Antioch at a regular meeting thereof held on the 19th day of May 2021.

AYES:

NOES:

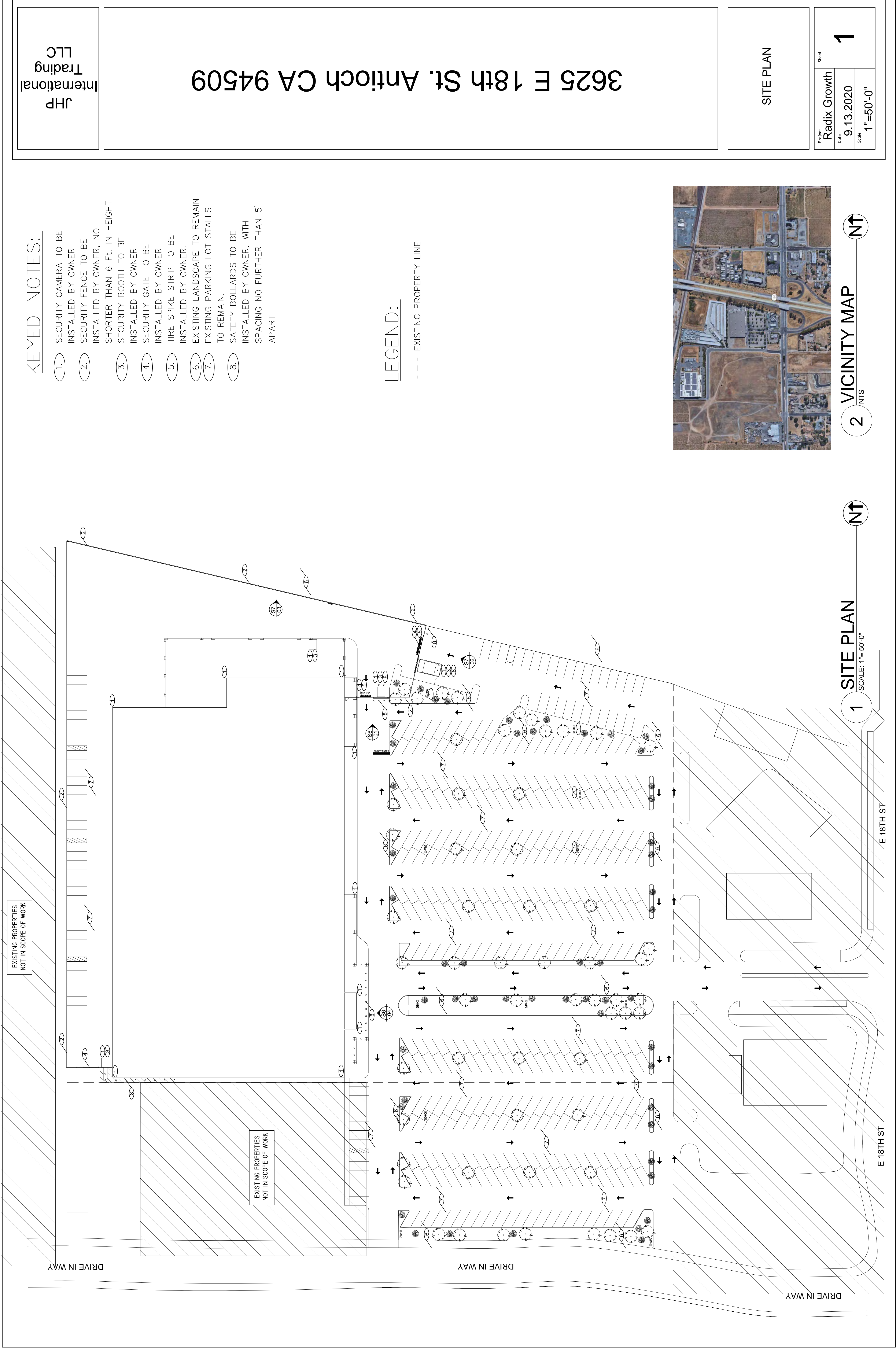
ABSTAIN:

ABSENT:

Forrest Ebbs
Secretary to the Planning Commission

ATTACHMENT B

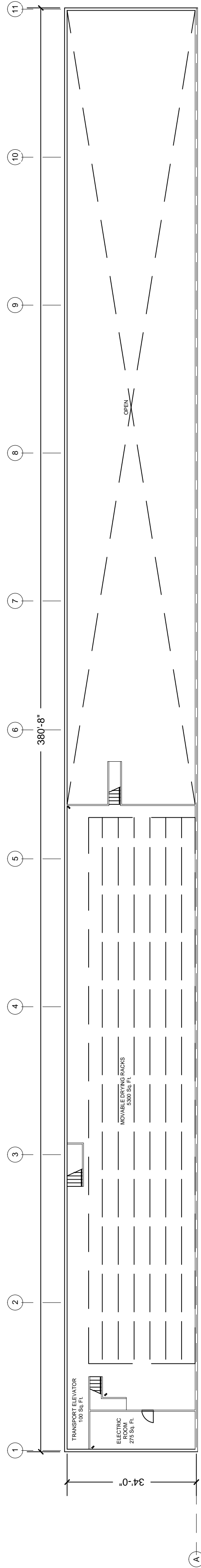
Project Plans



- A. PROVIDE BLOCKING AS REQ'D FOR ALL EQUIPMENT AND ACCESSORIES.
- B. ALL MATERIALS, EQUIPMENT AND APPLICATIONS TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS
- C. ALL SECURITY CAMERA PLACEMENT TO BE UTILIZED AT OWNERS DISCRETION
- D. REFER TO ROOM LAYOUT TYPE FOR ROOM DIMENSIONS

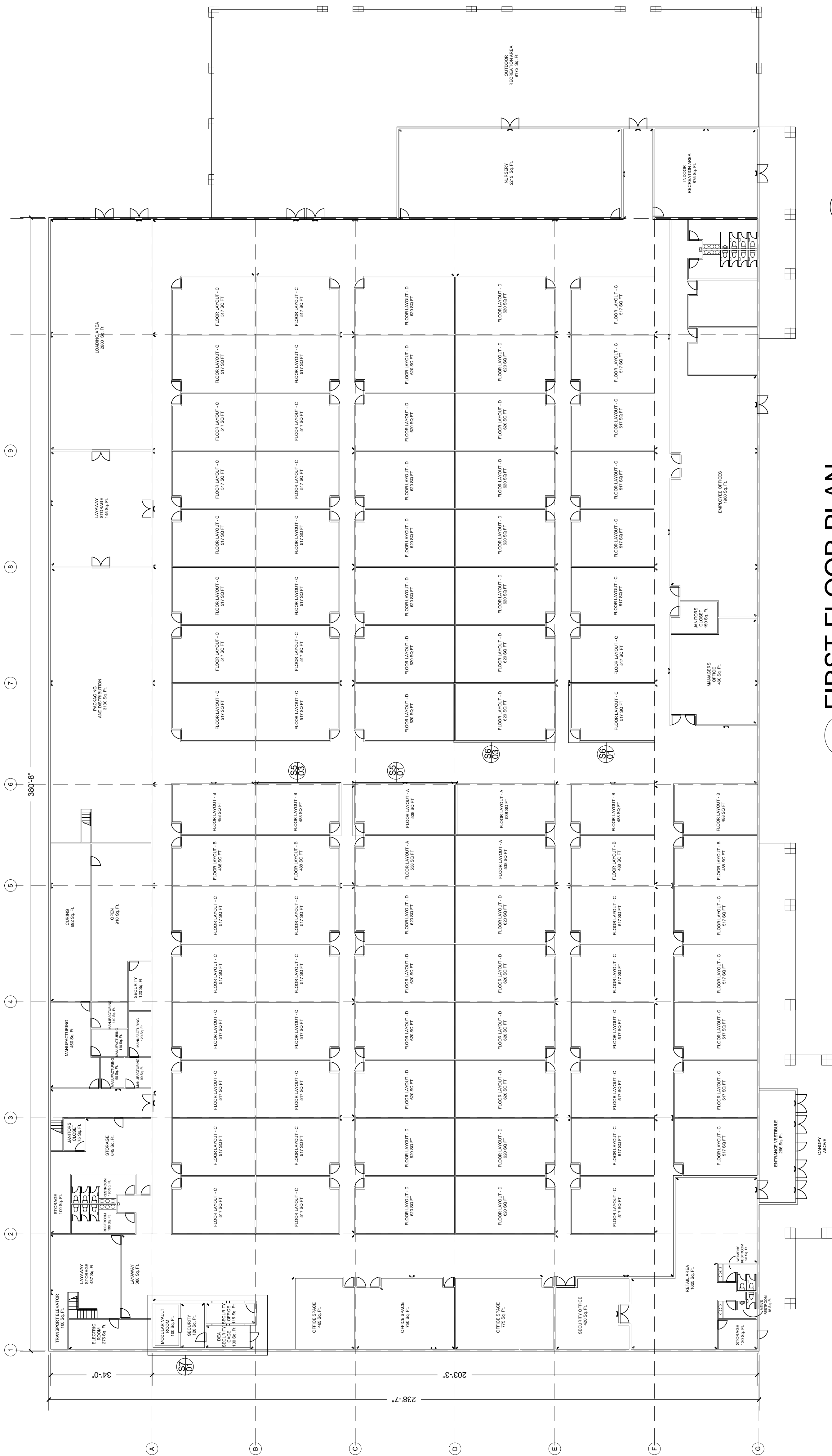
MEZZANINE PLAN

SCALE: 1"= 20'-0"




3 FIRST FLOOR PLAN

SCALE: 1"= 20'-0"



SYMBOL LIST:

- | | |
|---|------------------------------------|
|  | EMERGENCY LIGHTING |
|  | EMERGENCY LIGHTING
W/ EXIT SIGN |
|  | SECURITY CAMERA |

FACILITY FLOOR PLAN

Project	Radix Growth
Date	9.13.2020
Score	1"=20'-0"

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International
Trading
LLC

3625 E 18th St. Antioch CA 94509

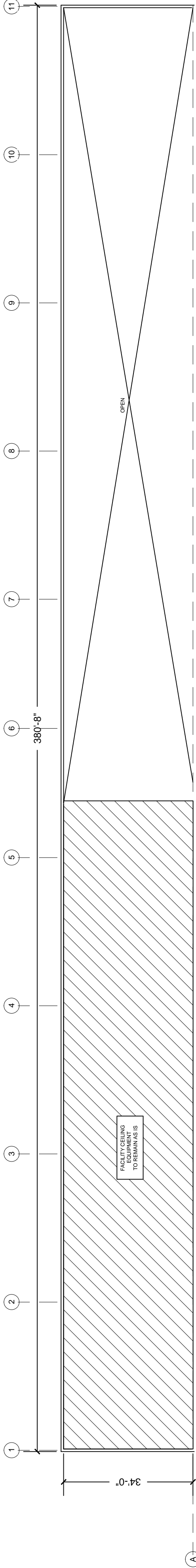
FACILITY REFLECTED
CEILING PLAN

Project	Radix Growth	Sheet
Date	9.13.2020	
Scale	1"=20'-0"	

3

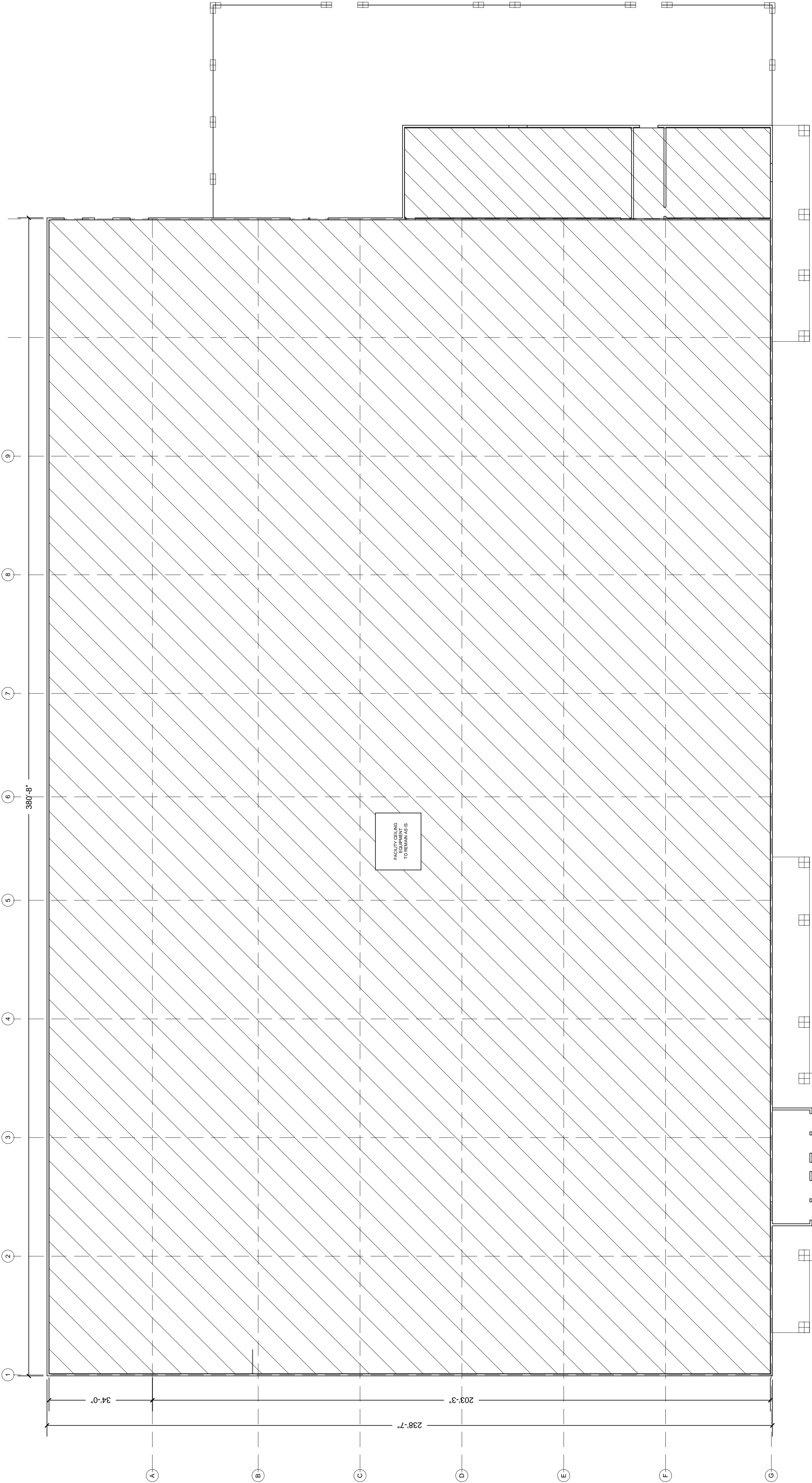
GENERAL NOTES:

- A. PROVIDE BLOCKING AS REQ'D FOR ALL EQUIPMENT AND ACCESSORIES.
- B. ALL MATERIALS, EQUIPMENT AND APPLICATIONS TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS
- C. ALL SECURITY CAMERA PLACEMENT TO BE UTILIZED AT OWNERS DISCRETION
- D. REFER TO ROOM LAYOUT TYPE FOR ROOM DIMENSIONS
- E. ELECTRICAL CONTRACTOR SHALL FURNISH AND INSTALL ANY ADDITIONAL REQUIRED LIGHTING FIXTURES.
- F. ELECTRICAL SUPPORT FOR ANY ADDITIONAL LIGHT FIXTURES IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.



1 MEZZANINE RCP

SCALE: 1"= 20'-0"



2 FIRST FLOOR RCP

SCALE: 1"= 20'-0"

GENERAL NOTES:

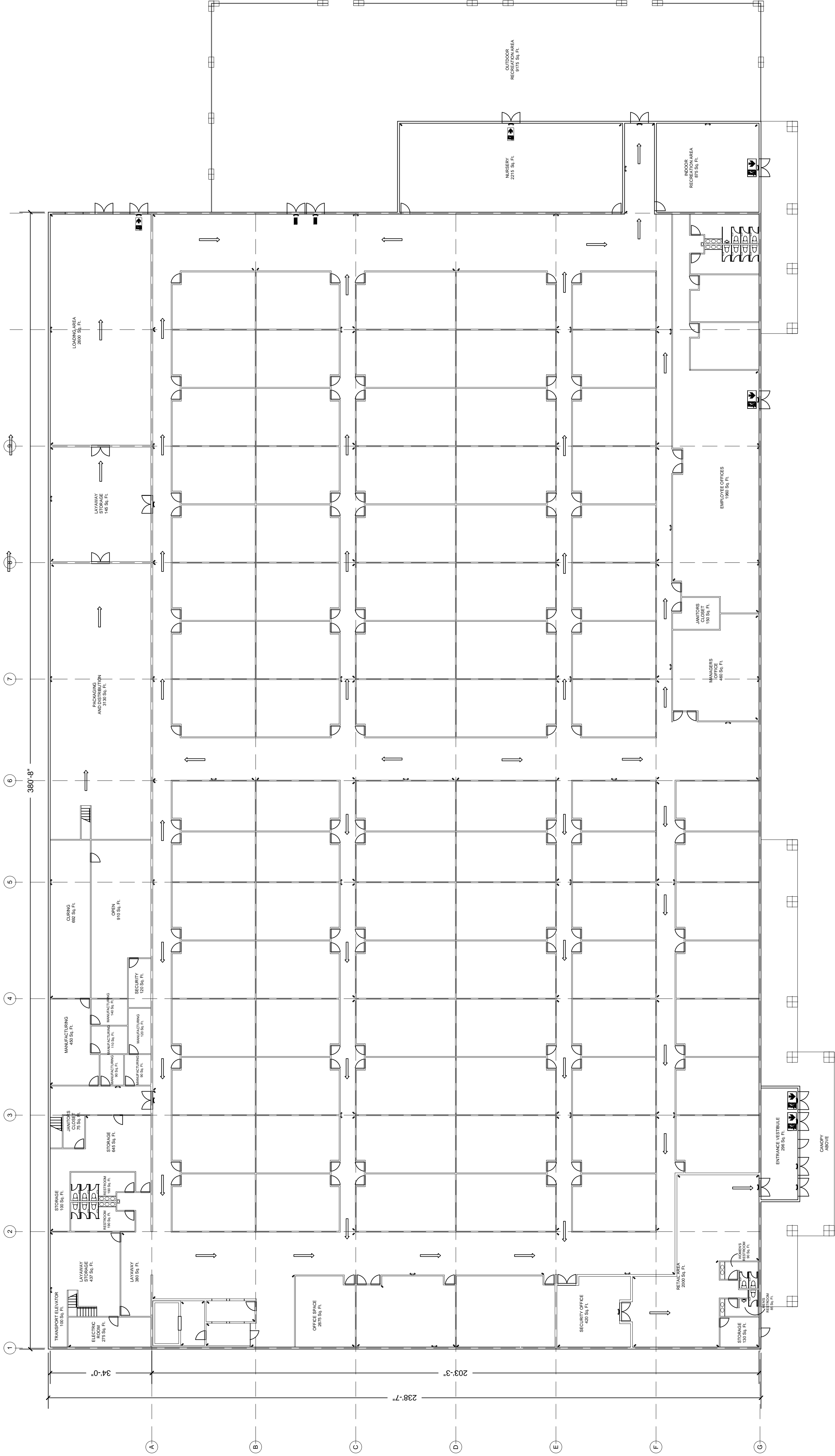
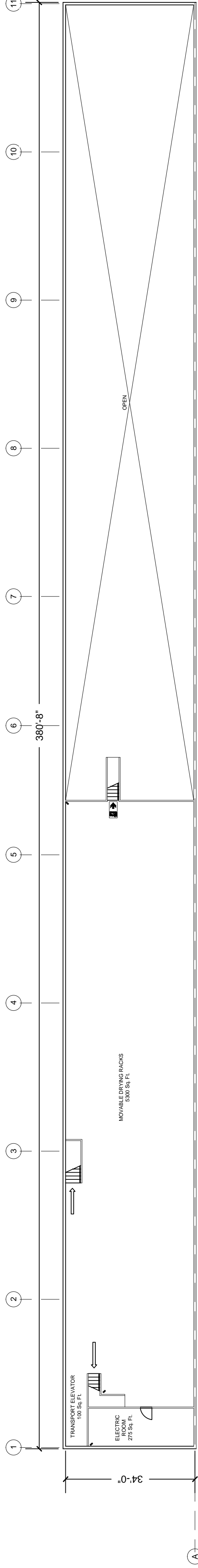
A. PROVIDE BLOCKING AS REQ'D FOR ALL EQUIPMENT AND ACCESSORIES.

B. ALL MATERIALS, EQUIPMENT AND APPLICATIONS TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS

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1 MEZZANINE EXIT PLAN

SCALE: 1"= 20'-0"



2 FIRST FLOOR EXIT PLAN

SCALE: 1"= 20'-0"



SYMBOL LIST:

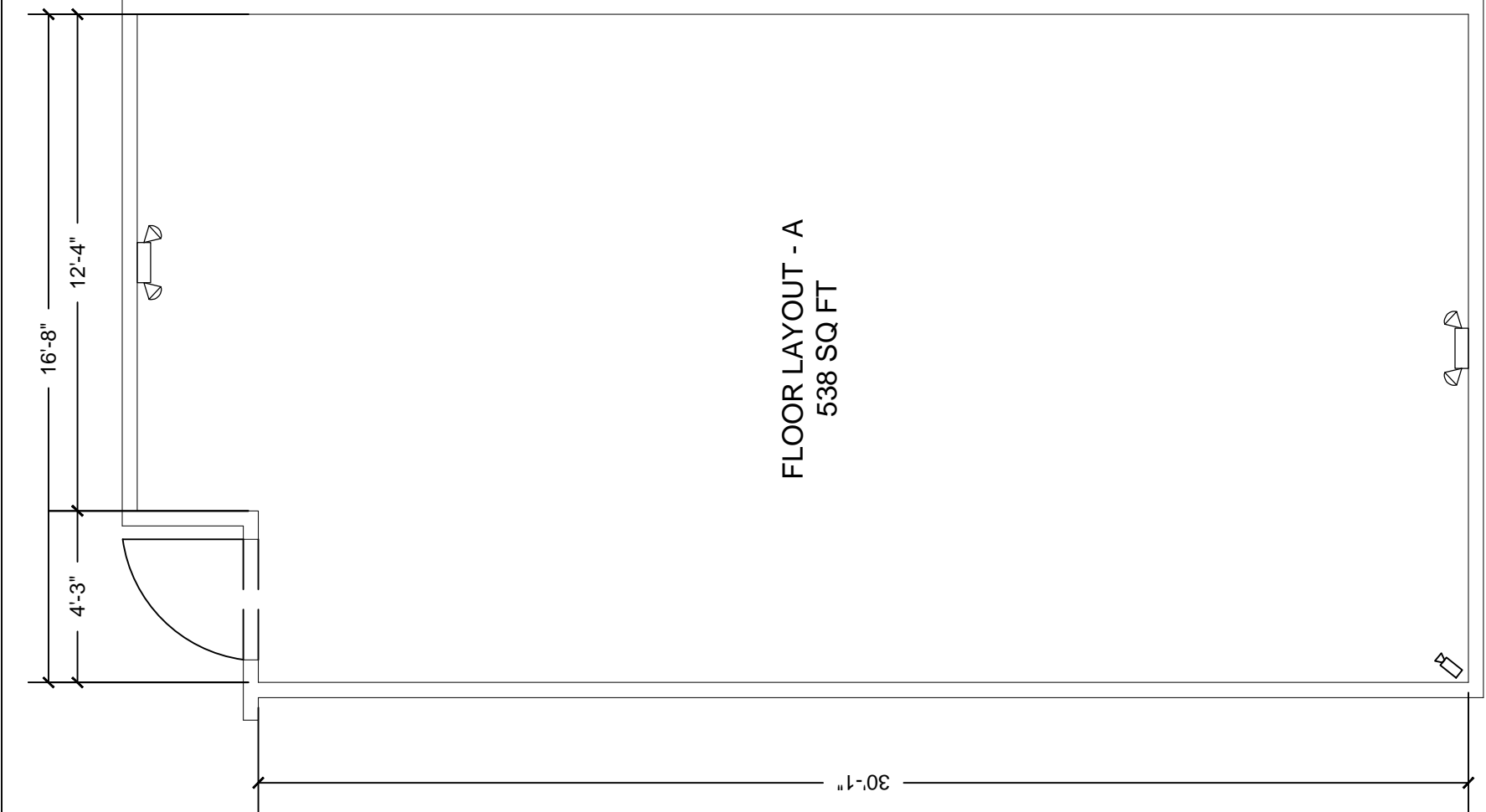
EMERGENCY LIGHTING

EMERGENCY LIGHTING W/ EXIT SIGN

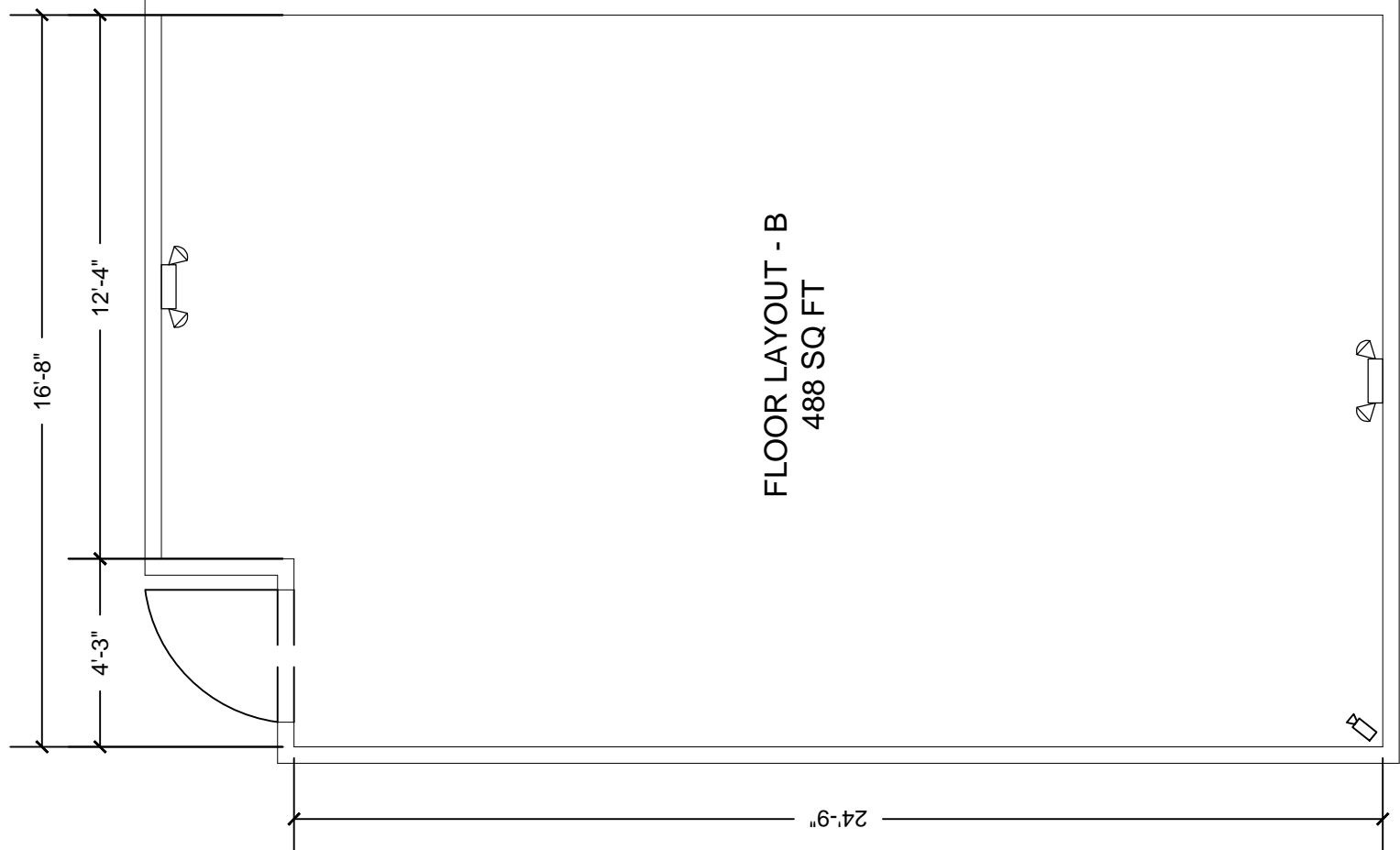
FACILITY FLOOR
EXIT PLANS

3625 E 18th St. Antioch CA 94509

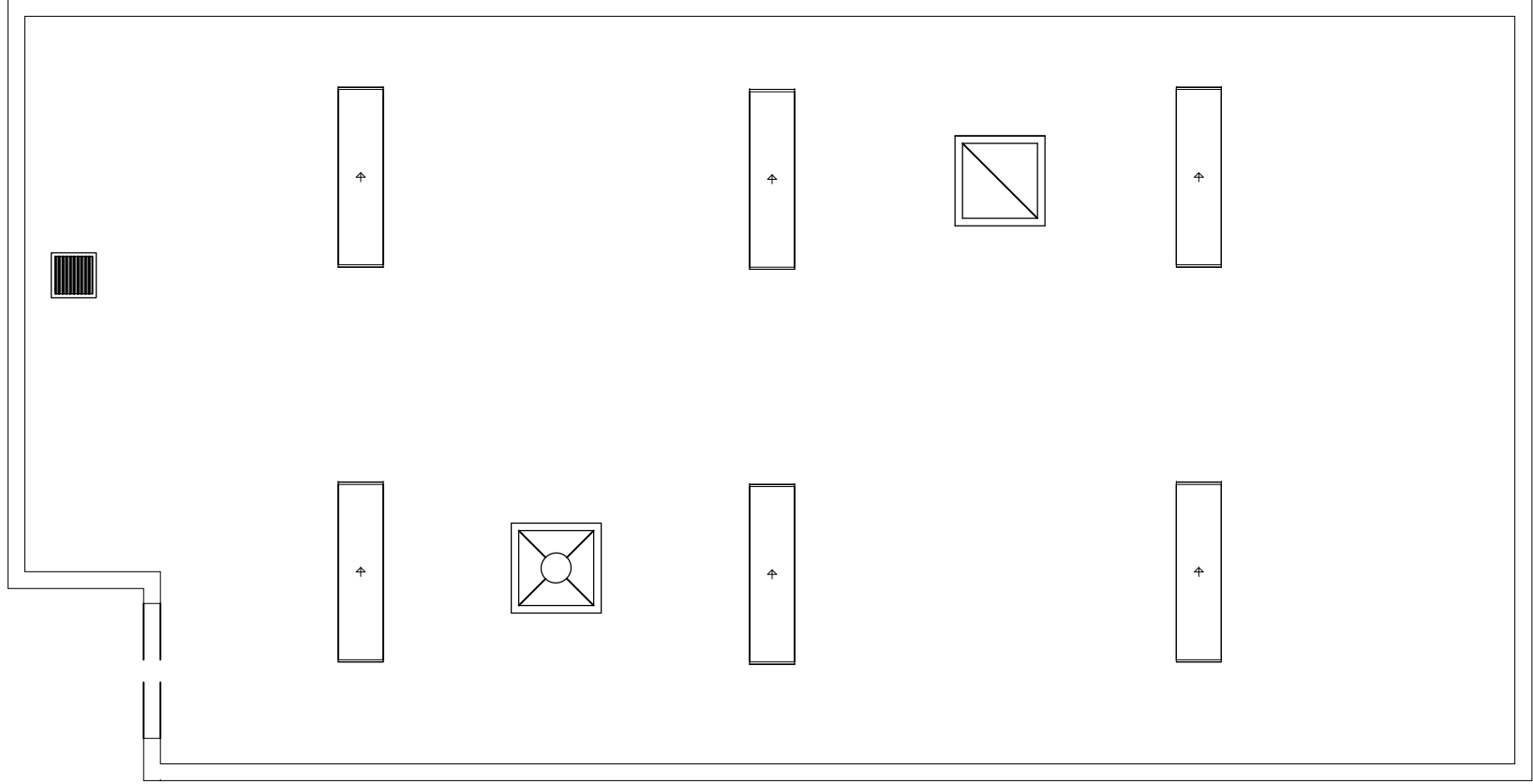
Project Radix Growth		Sheet 4
Date 9.13.2020		
Scale 1"=20'-0"		



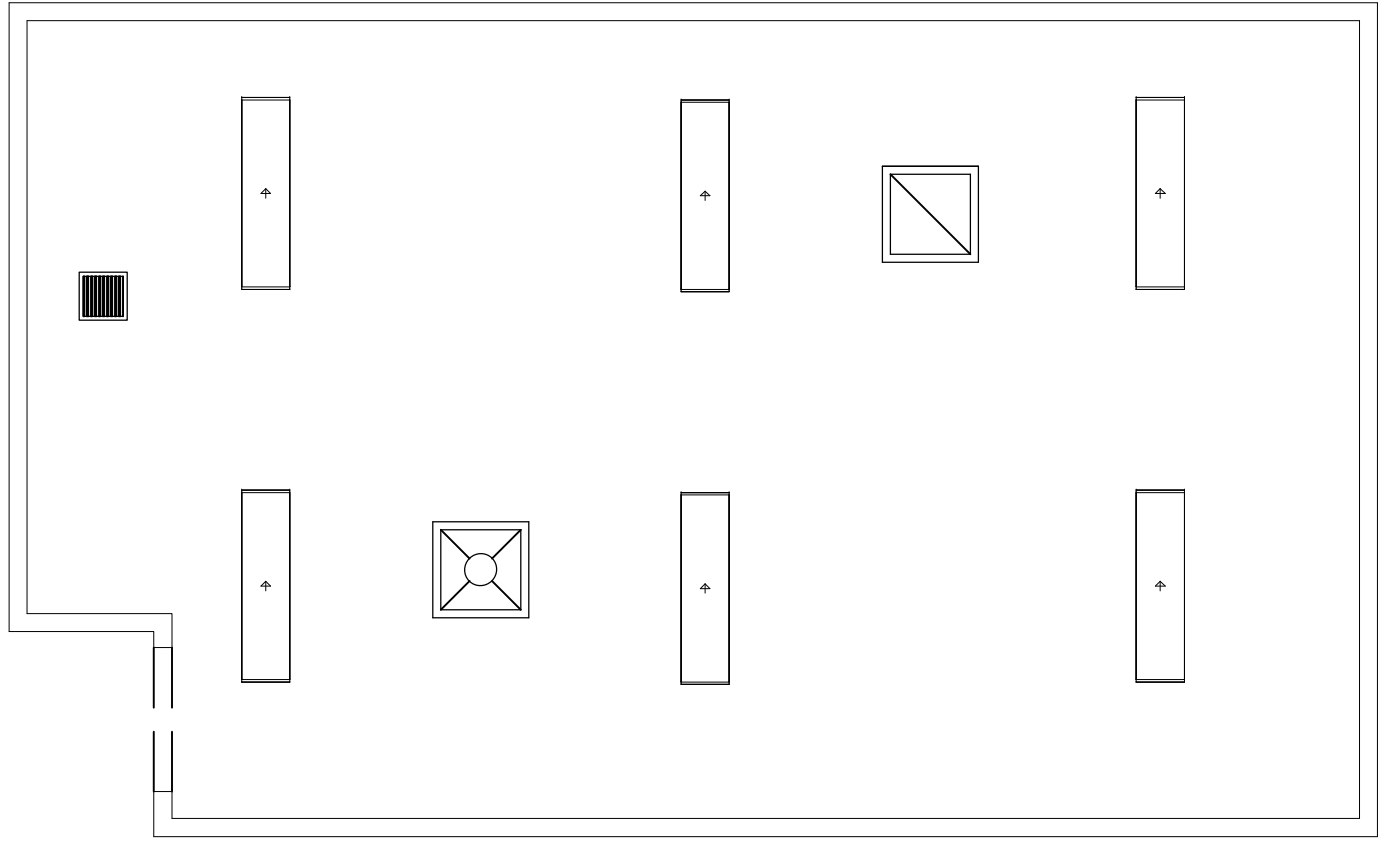
1 FLOOR LAYOUT A - FLOOR PLAN
SCALE: 1/4" = 1'-0"



3 FLOOR LAYOUT B - FLOOR PLAN
SCALE: 1/4" = 1'-0"



2 FLOOR LAYOUT A - RCP
SCALE: 1/4" = 1'-0"



4 FLOOR LAYOUT B - RCP
SCALE: 1/4" = 1'-0"

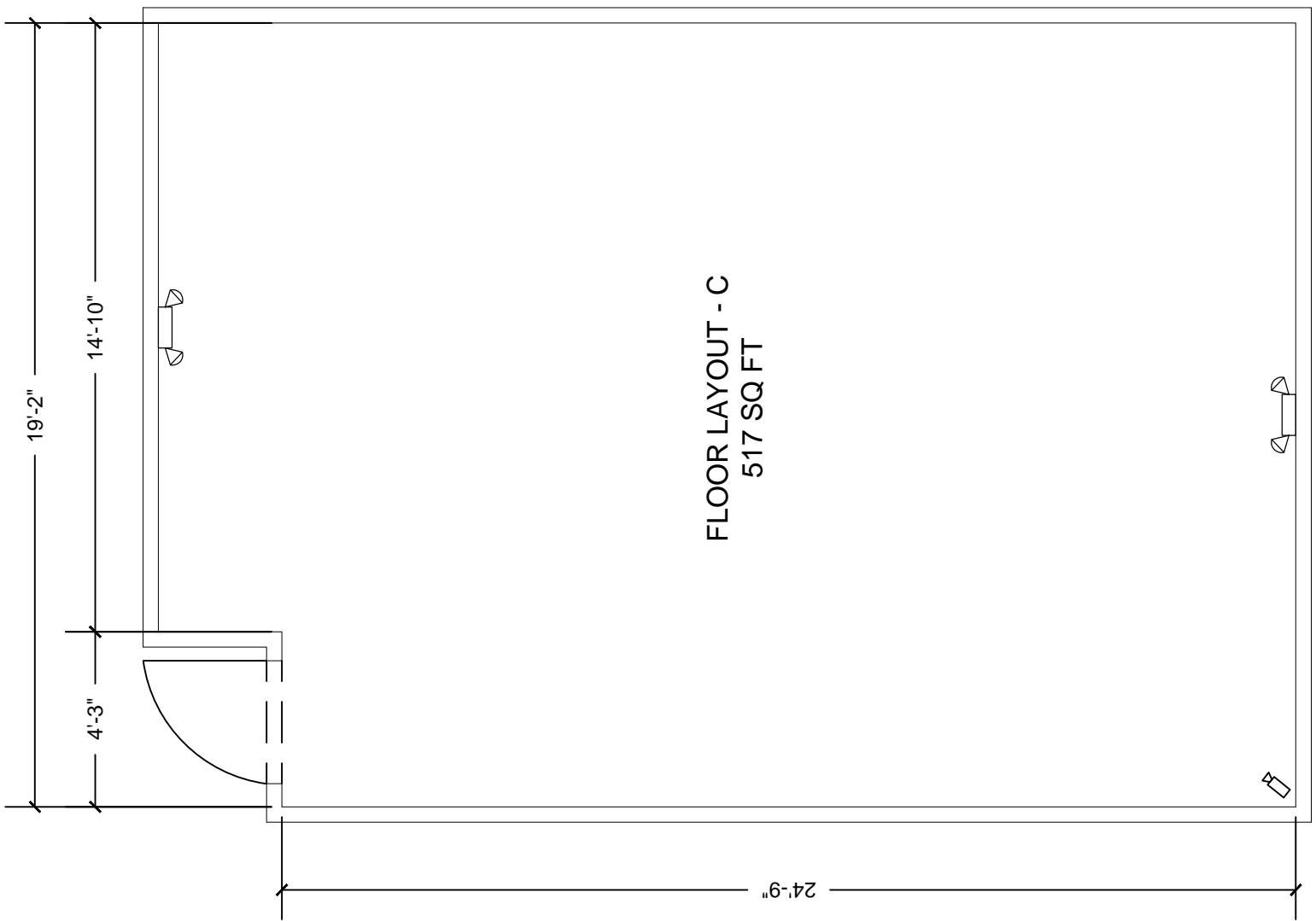
- GENERAL NOTES:
- A. PROVIDE BLOCKING AS REQ'D FOR ALL EQUIPMENT AND ACCESSORIES.
 - B. ALL MATERIALS, EQUIPMENT AND APPLICATIONS TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS
 - C. ALL SECURITY CAMERA PLACEMENT TO BE UTILIZED AT OWNERS DISCRETION
 - D. REFER TO ROOM LAYOUT TYPE FOR ROOM DIMENSIONS

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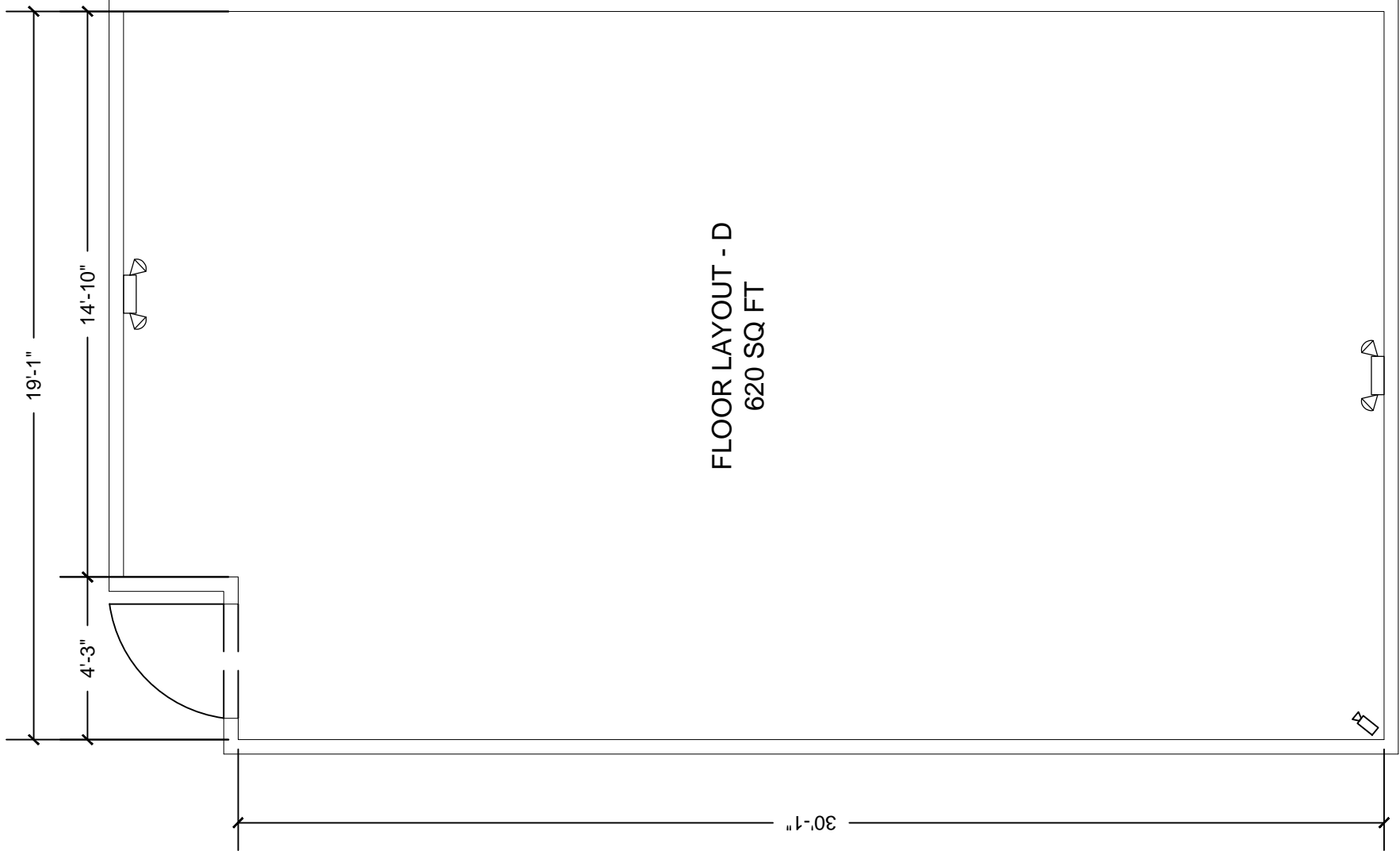
3625 E 18th St. Antioch CA 94509

FLOOR LAYOUT
PLANS

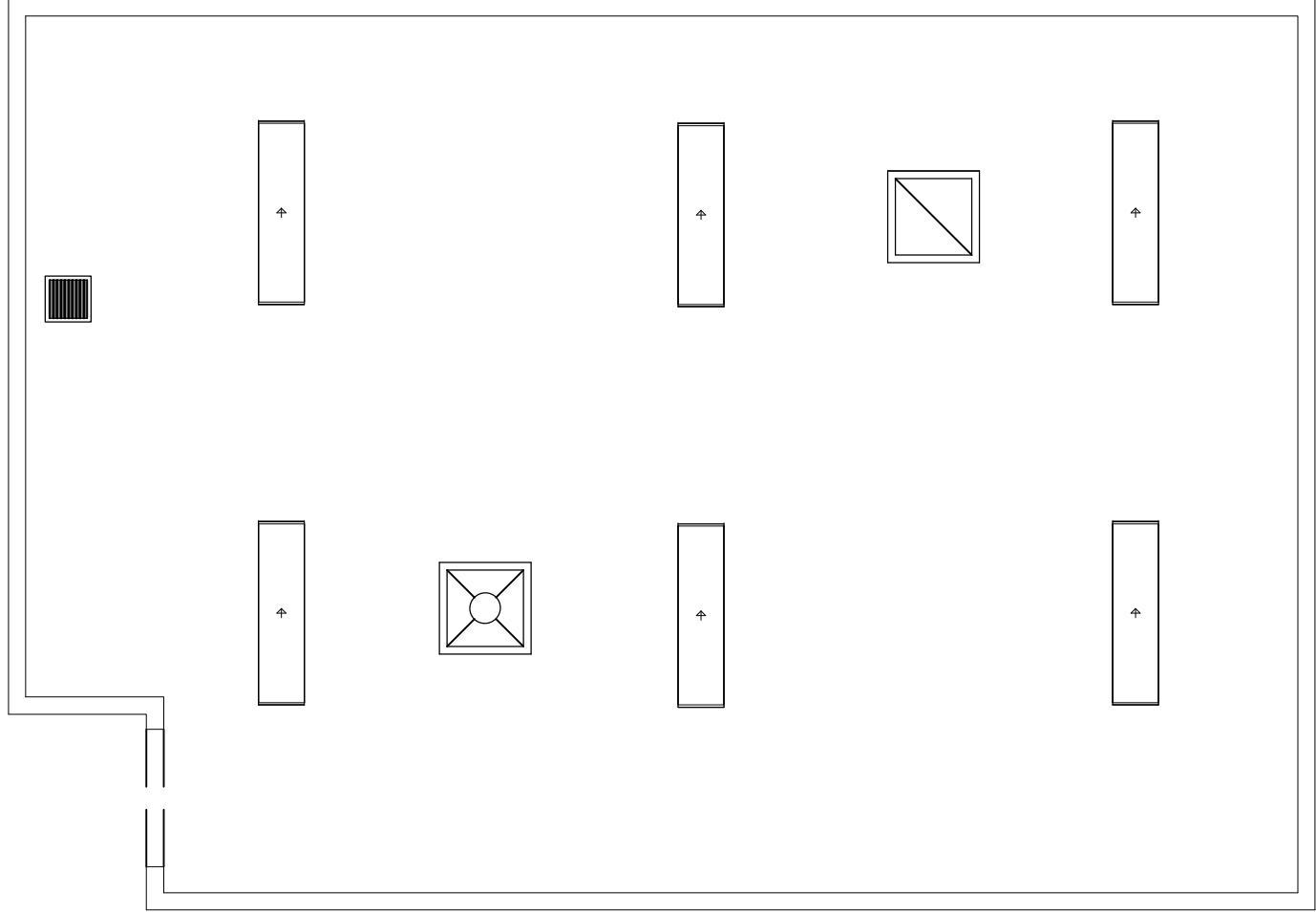
Project Radix Growth	Sheet 5
Date 9.13.2020	
Scale 1/4" = 1'-0"	



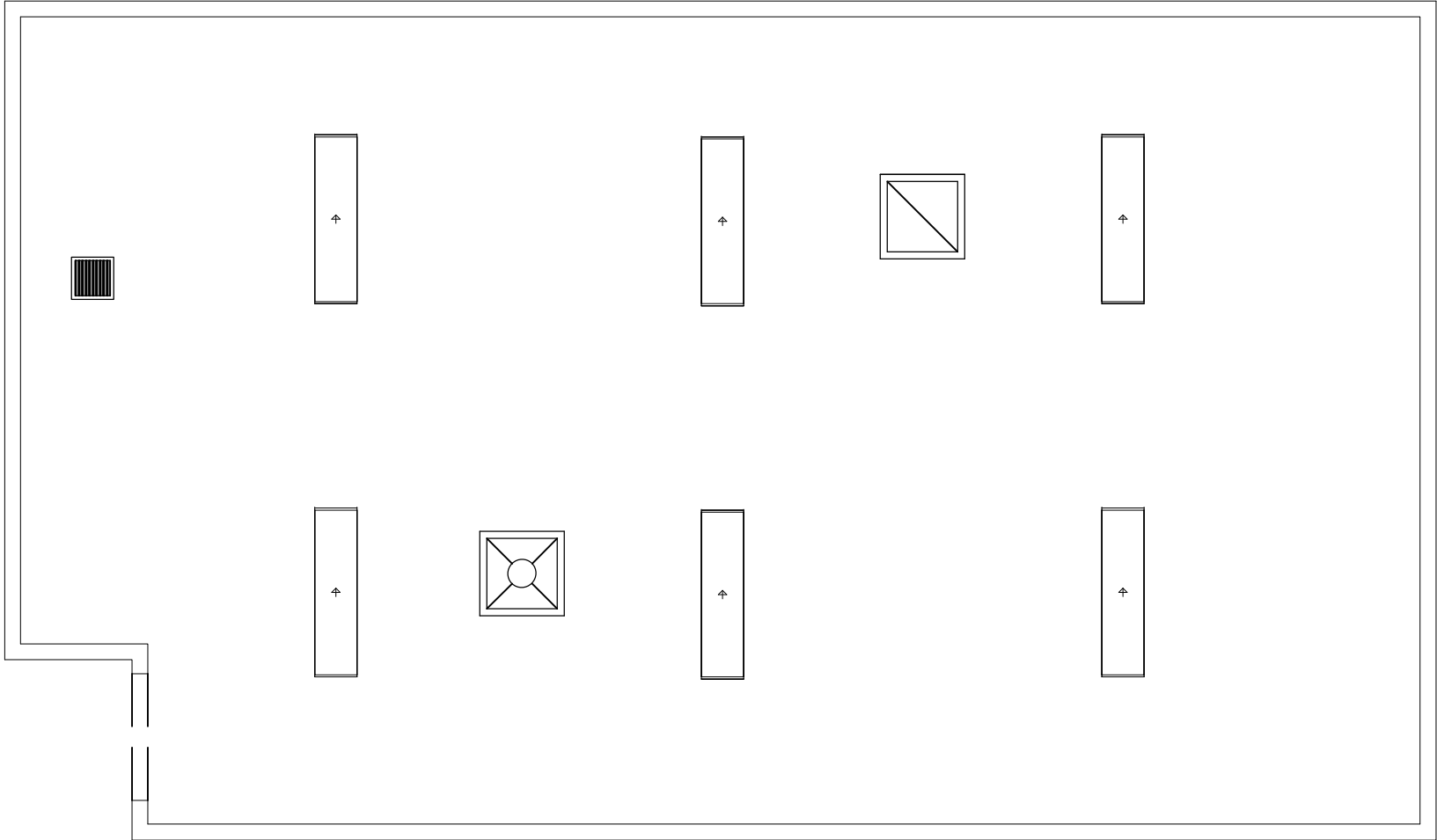
1 FLOOR LAYOUT C - FLOOR PLAN
SCALE: 1/4"= 1'-0"



3 FLOOR LAYOUT D - FLOOR PLAN
SCALE: 1/4"= 1'-0"



2 FLOOR LAYOUT C - RCP
SCALE: 1/4"= 1'-0"



4 FLOOR LAYOUT D - RCP
SCALE: 1/4"= 1'-0"

GENERAL NOTES:

- A. PROVIDE BLOCKING AS REQ'D FOR ALL EQUIPMENT AND ACCESSORIES.
- B. ALL MATERIALS, EQUIPMENT AND APPLICATIONS TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS
- C. ALL SECURITY CAMERA PLACEMENT TO BE UTILIZED AT OWNERS DISCRETION
- D. REFER TO ROOM LAYOUT TYPE FOR ROOM DIMENSIONS

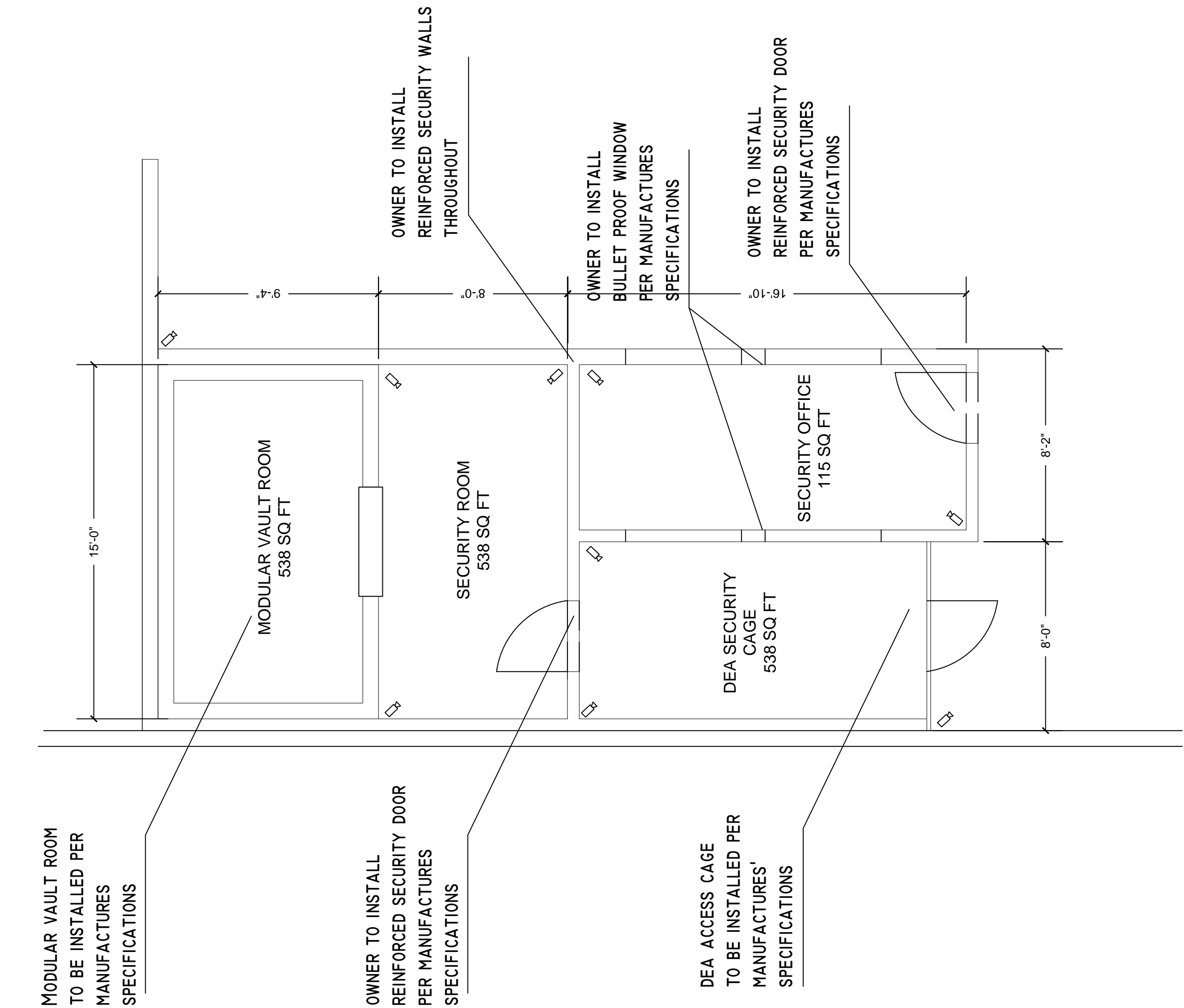
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FLOOR LAYOUT
PLANS

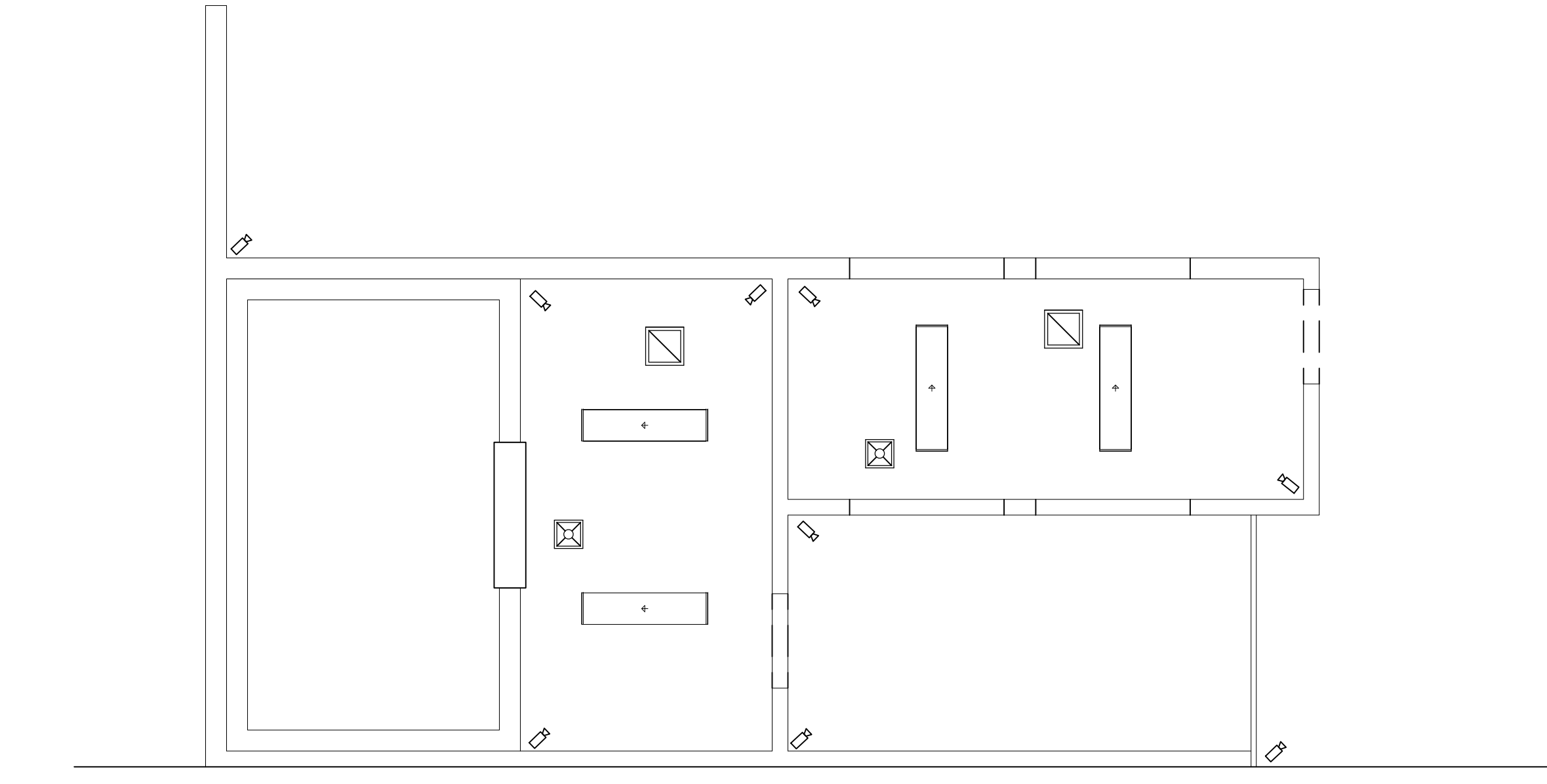
Project	Radix Growth	Sheet
Date	9.13.2020	
Scale	1/4"=1'-0"	

6



1 FLOOR PLAN

SCALE: 1/4"= 1'-0"



2 REFLECTED CEILING PLAN

SCALE: 1/4"= 1'-0"

- GENERAL NOTES:
- A. PROVIDE BLOCKING AS REQ'D FOR ALL EQUIPMENT AND ACCESSORIES.
 - B. ALL MATERIALS, EQUIPMENT AND APPLICATIONS TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS
 - C. ALL SECURITY CAMERA PLACEMENT TO BE UTILIZED AT OWNERS DISCRETION
 - D. REFER TO ROOM LAYOUT TYPE FOR ROOM DIMENSIONS

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FLOOR LAYOUT
PLANS

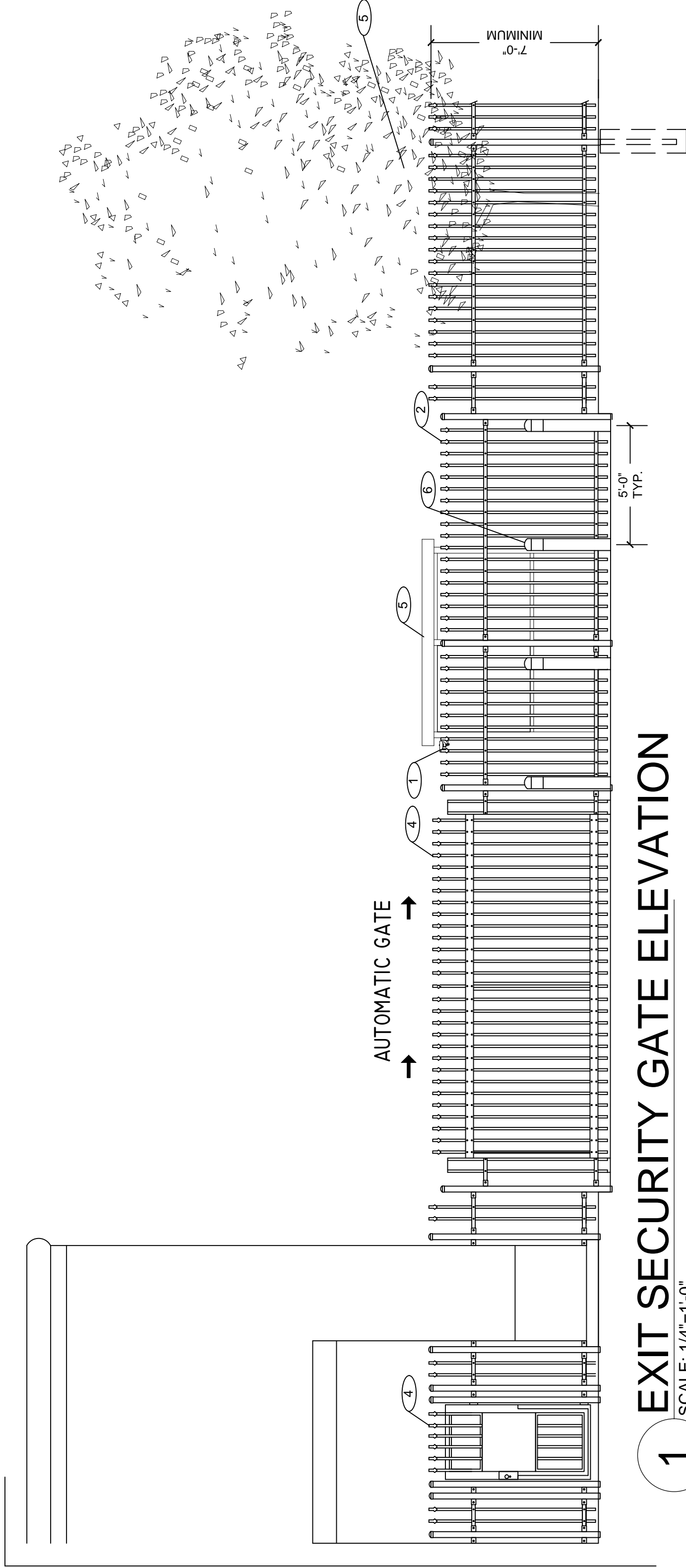
Project	Radix Growth	Sheet
Date	9.13.2020	
Scale	1/4"=1'-0"	7

GENERAL NOTES:

- A. PROVIDE BLOCKING AS REQ'D FOR ALL EQUIPMENT AND ACCESSORIES.
- B. ALL MATERIALS, EQUIPMENT AND APPLICATIONS TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS
- C. ALL SECURITY CAMERA PLACEMENT TO BE UTILIZED AT OWNERS DISCRETION
- D. REFER TO ROOM LAYOUT TYPE FOR ROOM DIMENSIONS

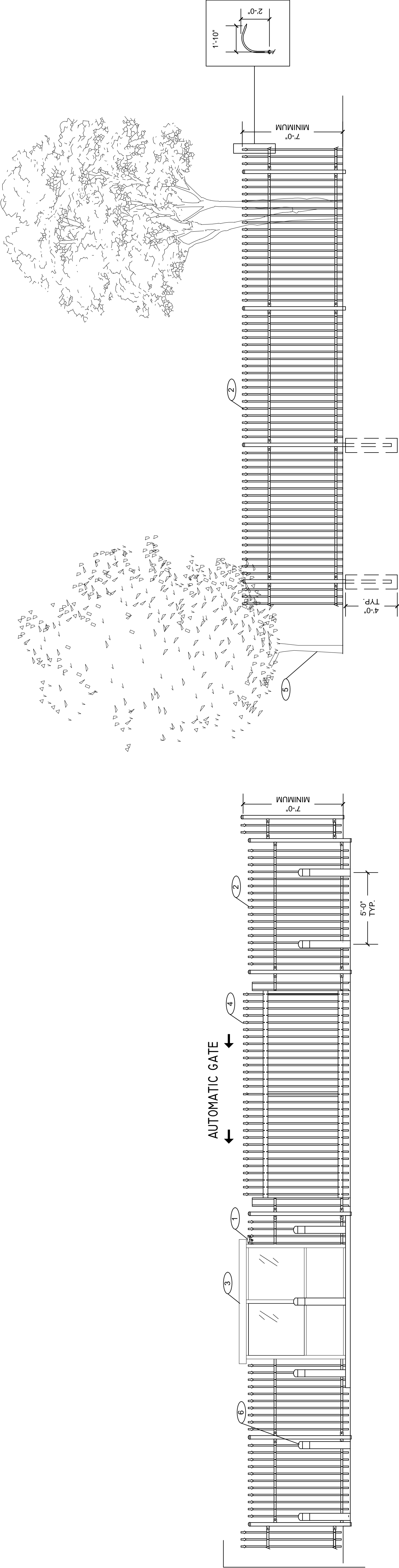
KEYED NOTES:

- 1. SECURITY CAMERA TO BE INSTALLED BY OWNER
- 2. SECURITY FENCE TO BE INSTALLED BY OWNER, NO SHORTER THAN 7 Ft. IN HEIGHT
- 3. SECURITY BOOTH TO BE INSTALLED BY OWNER
- 4. SECURITY GATE TO BE INSTALLED BY OWNER
- 5. EXISTING LANDSCAPE TO REMAIN
- 6. SAFETY BOLLARDS TO BE INSTALLED BY OWNER, WITH SPACING NO FURTHER THAN 5' APART



1 EXIT SECURITY GATE ELEVATION

SCALE: 1/4"=1'-0"

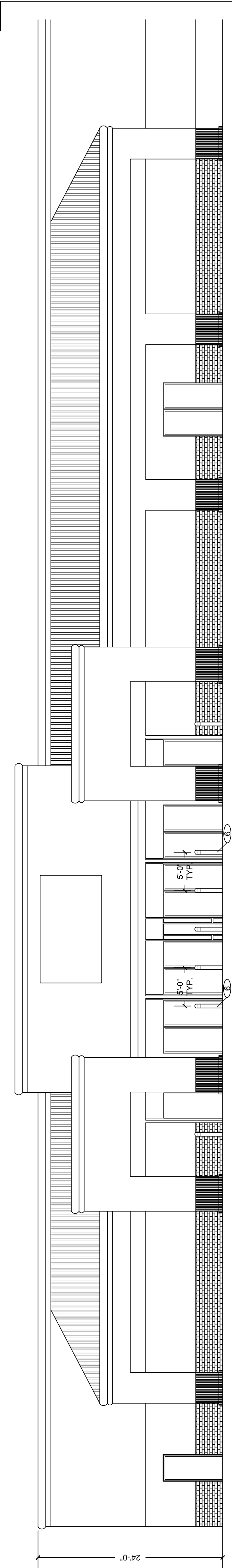


2 ENTRANCE SECURITY GATE ELEVATION

SCALE: 1/4"=1'-0"

3 TYP. SECURITY FENCE ELEVATION

SCALE: 1/4"=1'-0"



4 BUILDING ELEVATION

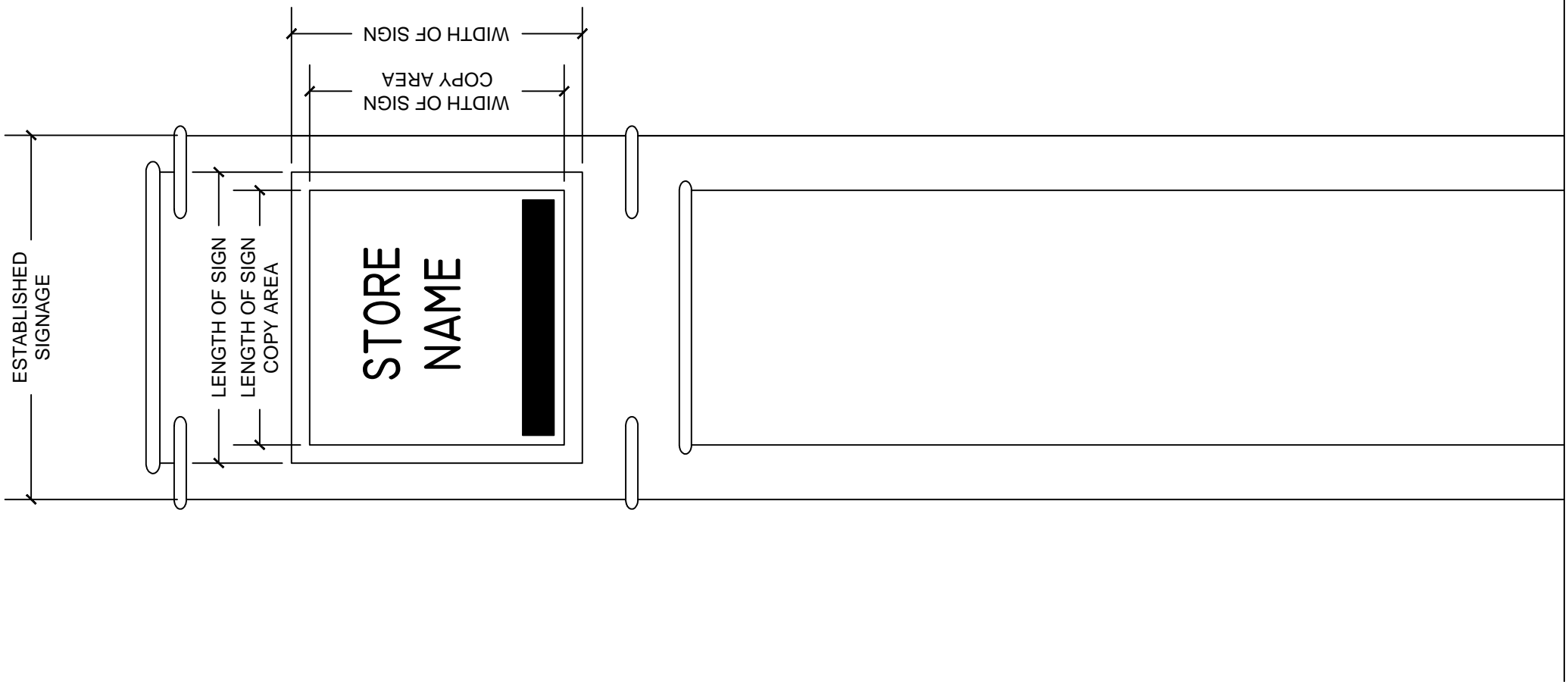
SCALE: 1/8"=1'-0"

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3625 E 18th St. Antioch CA 94509

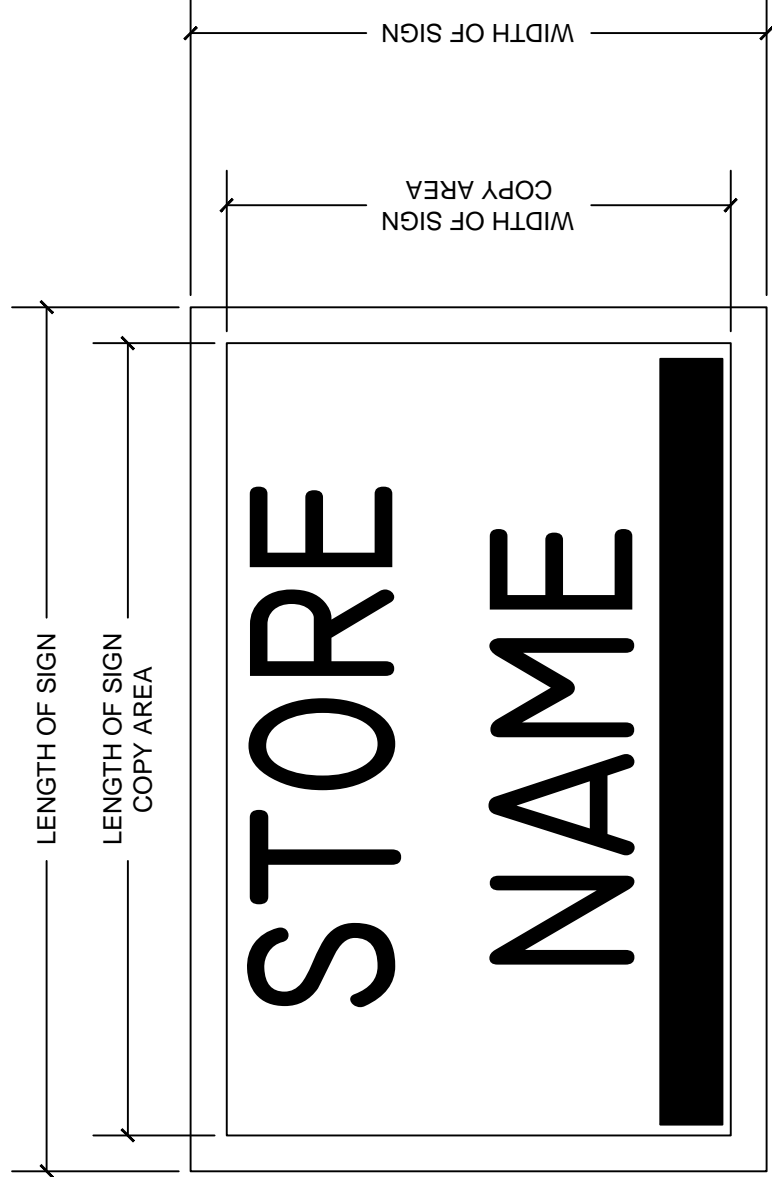
ELEVATIONS

Project Radix Growth	Sheet 8
Date 9.13.2020	
Scale 1/4"=1'-0"	



1 PROPOSED SIGNAGE
SCALE: 1/4"=1'-0"

2 PROPOSED SIGNAGE
SCALE: 3/8"=1'-0"



GENERAL NOTES:

- A. PLEASE NOTE THIS IS A "PRELIMINARY" DRAWING TO BE USED FOR SIGN AND ELECTRICAL REFERENCE ONLY.
- B. FINAL SIGN DESIGN TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS.
- C. FINAL SIGN DESIGN IS RESPONSIBILITY OF THE OWNER.
- D. ELECTRICAL SUPPORT FOR THE ILLUMINATED SIGNAGE IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.
- E. FINAL INSTALLATION OF SIGNS AND ELECTRICAL CONNECTIONS IS THE RESPONSIBILITY OF THE SIGN INSTALLER
- F. REMOVAL OF EXISTING SIGNAGE IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.
- G. CLEAN, PATCH, SEAL AND PAINT IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.

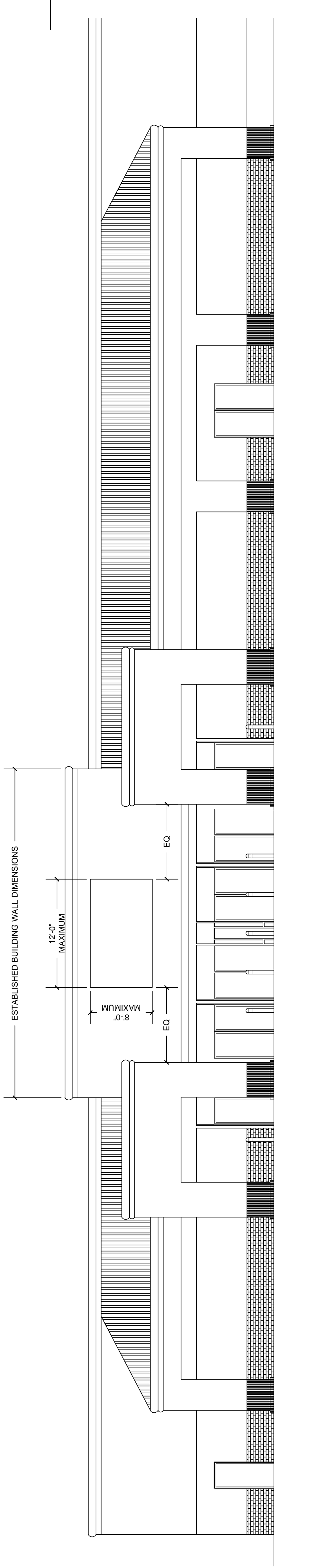
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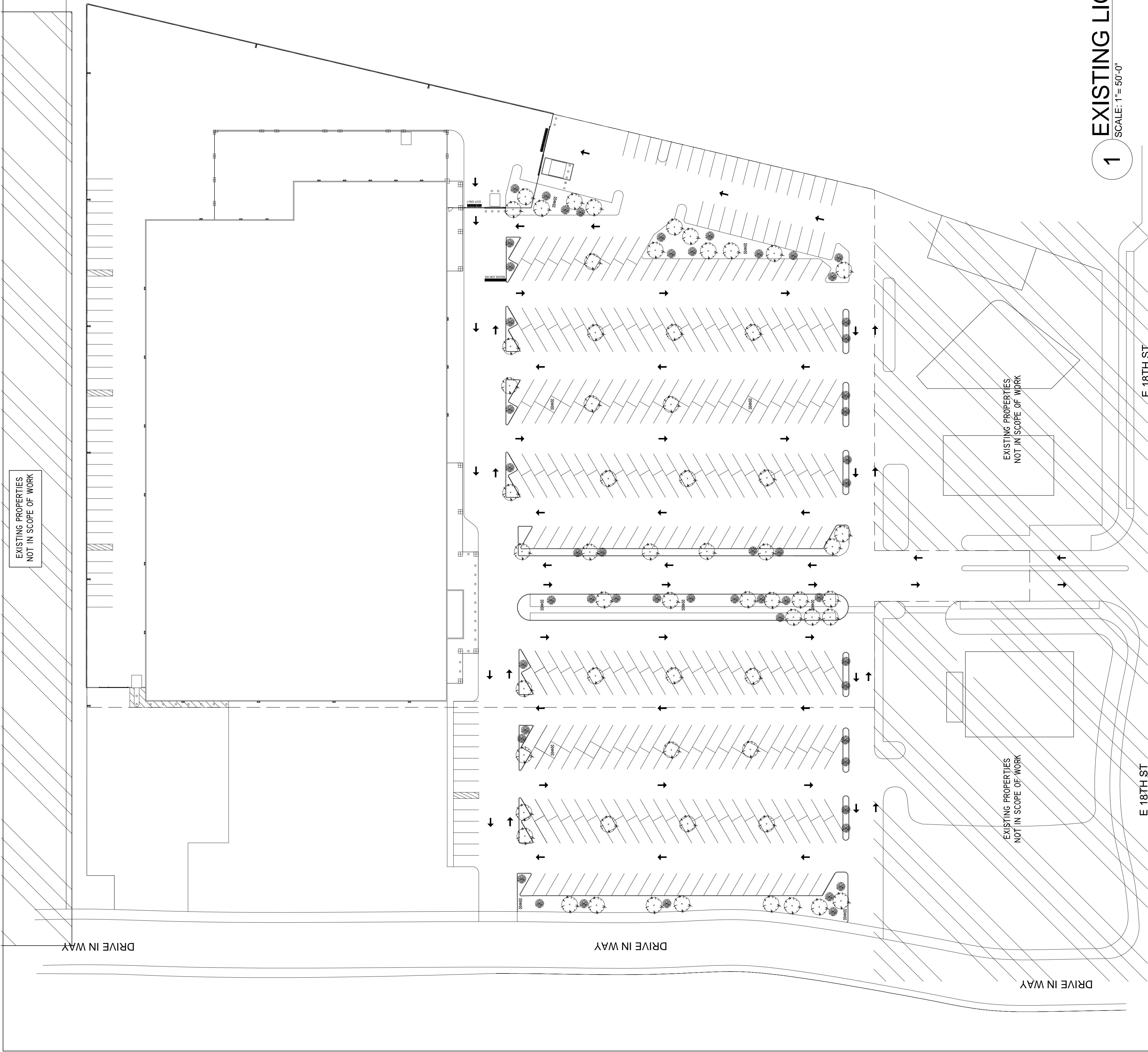
3625 E 18th St. Antioch CA 94509

SIGNAGE

Project Radix Growth	Sheet 9
Date 9.13.2020	
Scale 1/8"=1'-0"	

3 PROPOSED SIGNAGE
SCALE: 1/8"=1'-0"





EXISTING PROPERTIES
NOT IN SCOPE OF WORK

EXISTING PROPERTIES
NOT IN SCOPE OF WORK

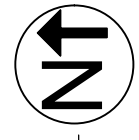
EXISTING PROPERTIES
NOT IN SCOPE OF WORK

E 18TH ST

E 18TH ST

1 EXISTING LIGHTING PLAN

SCALE: 1"= 50'-0"



GENERAL NOTES:

- A. PLEASE NOTE THIS IS A "PRELIMINARY" DRAWING TO BE USED FOR ELECTRICAL REFERENCE ONLY.
- B. FINAL LIGHT DESIGN TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS. INCLUDING FOOTCANDLE REQUIREMENTS.
- C. ALL LIGHTING LOCATIONS, DIMENSIONS AND HEIGHTS TO BE FIELD VERIFY BEFORE DESIGN AND CONSTRUCTION.
- D. FINAL LIGHT DESIGN IS RESPONSIBILITY OF THE OWNER.
- E. ELECTRICAL SUPPORT FOR ANY NEW OR EXISTING LIGHTING IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.
- F. FINAL INSTALLATION OF LIGHTS AND ELECTRICAL CONNECTIONS IS THE RESPONSIBILITY OF THE INSTALLER
- G. REMOVAL OF ANY EXISTING LIGHTS IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.
- H. CLEAN, PATCH, SEAL AND PAINT IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.

SYMBOL LIST:

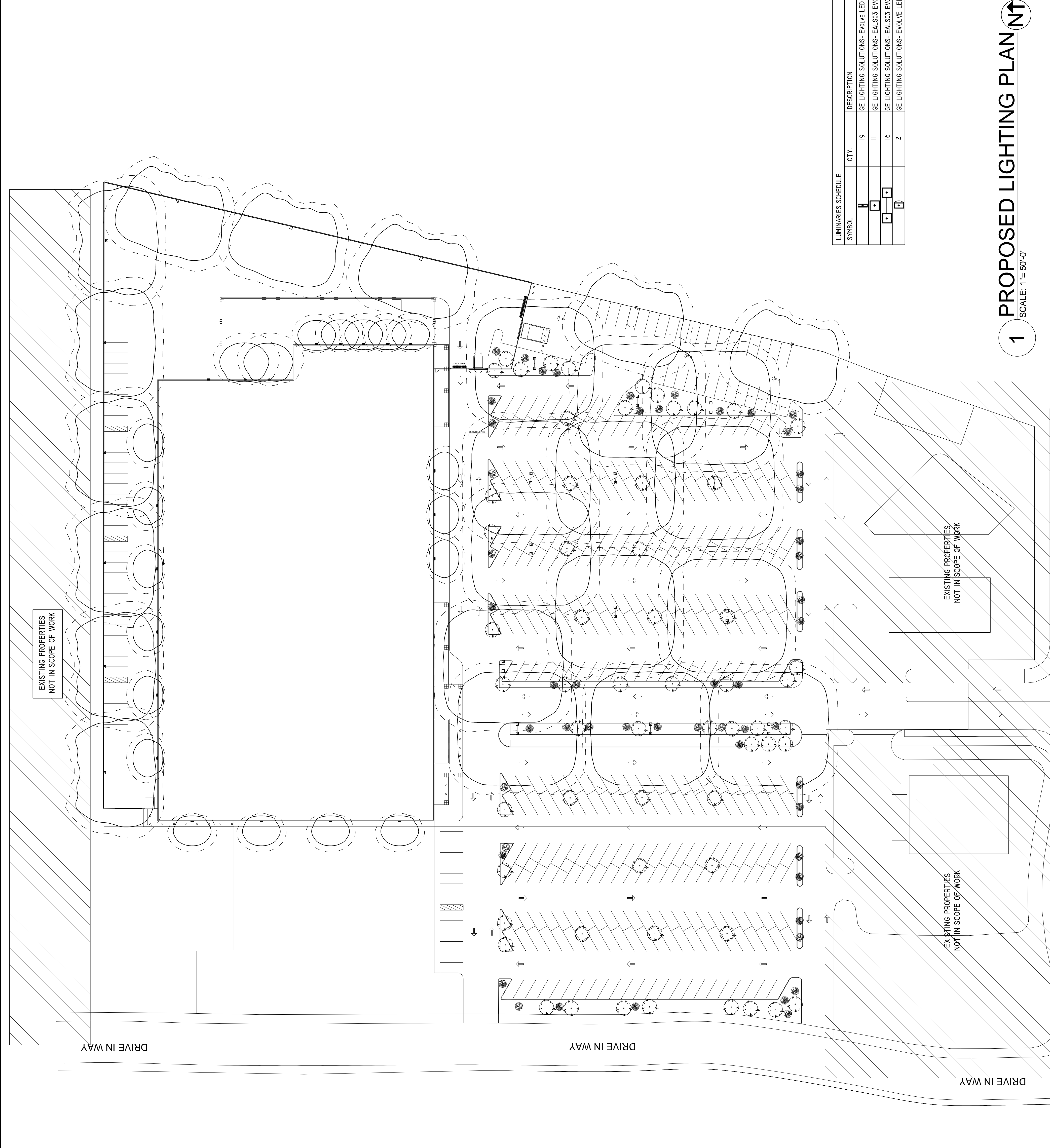
- EMERGENCY LIGHTING
- EMERGENCY LIGHTING W/ EXIT SIGN
- SECURITY CAMERA
- LED WALL PACK
- LED AREA LIGHTING
- LED AREA LIGHTING
- LED FLOOD LIGHT

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3625 E 18th St. Antioch CA 94509

LIGHTING PLAN

Project	Radix Growth	Sheet	10
Date	10.28.2020		
Scale	1"=50'-0"		



EXISTING PROPERTIES
NOT IN SCOPE OF WORK

EXISTING PROPERTIES
NOT IN SCOPE OF WORK

EXISTING PROPERTIES
NOT IN SCOPE OF WORK

GENERAL NOTES:

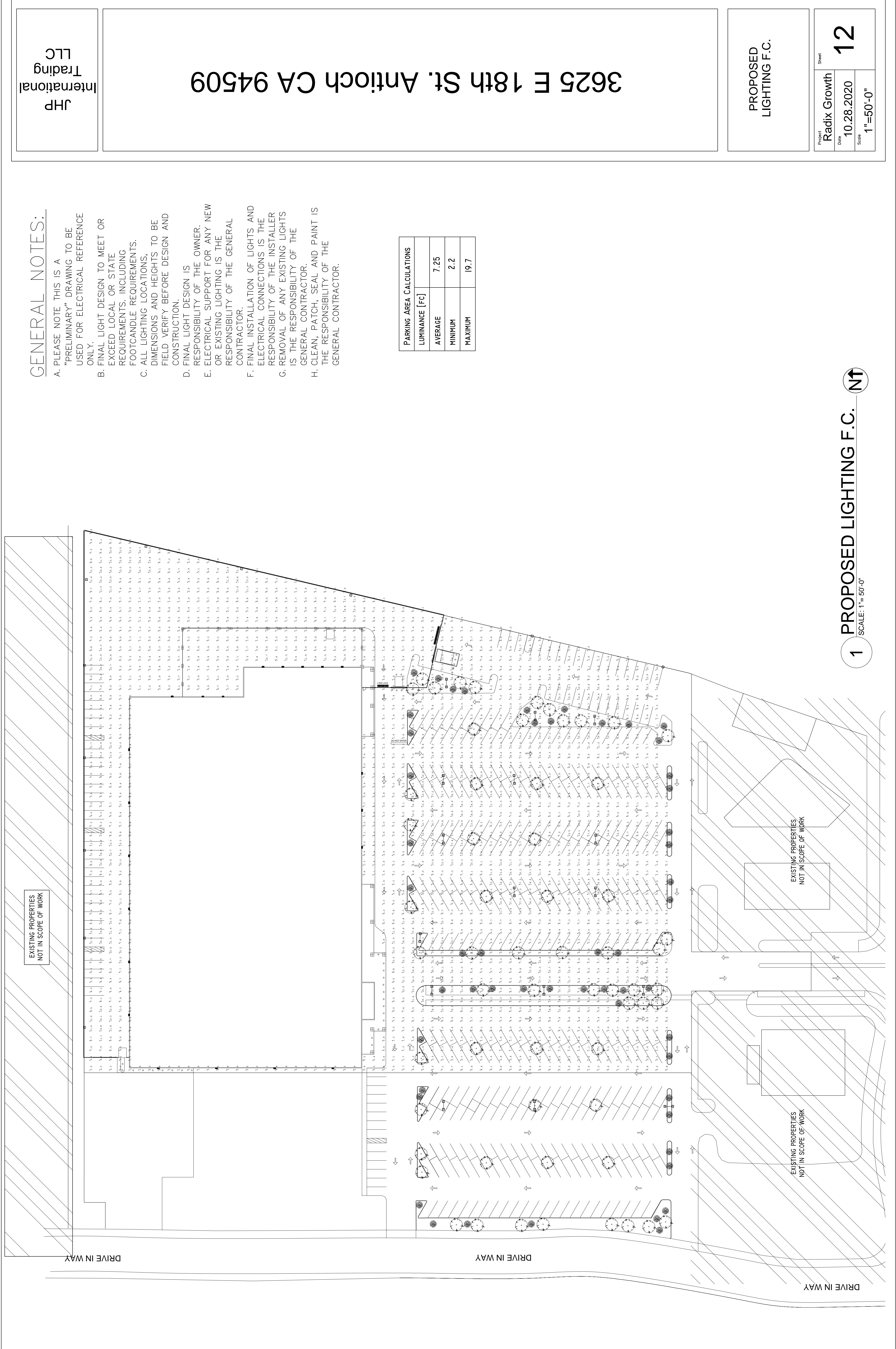
- A. PLEASE NOTE THIS IS A "PRELIMINARY" DRAWING TO BE USED FOR ELECTRICAL REFERENCE ONLY.
- B. FINAL LIGHT DESIGN TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS. INCLUDING FOOTCANDLE REQUIREMENTS.
- C. ALL LIGHTING LOCATIONS, DIMENSIONS AND HEIGHTS TO BE FIELD VERIFY BEFORE DESIGN AND CONSTRUCTION.
- D. FINAL LIGHT DESIGN IS RESPONSIBILITY OF THE OWNER.
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- F. FINAL INSTALLATION OF LIGHTS AND ELECTRICAL CONNECTIONS IS THE RESPONSIBILITY OF THE INSTALLER
- G. REMOVAL OF ANY EXISTING LIGHTS IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.
- H. CLEAN, PATCH, SEAL AND PAINT IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.

SYMBOL LIST:

- EMERGENCY LIGHTING
- EMERGENCY LIGHTING W/ EXIT SIGN
- SECURITY CAMERA
- LED WALL PACK
- LED AREA LIGHTING
- LED AREA LIGHTING
- LED FLOOD LIGHT
- 2 FOOTCANDLES
- 1 FOOTCANDLES

LUMINAIRES SCHEDULE			
SYMBOL	QTY.	DESCRIPTION	ARRANGEMENT
⌂	19	GE LIGHTING SOLUTIONS- EVOLVE LED AREA LIGHT - WALL PACK	SINGLE
⬢	11	GE LIGHTING SOLUTIONS- EALS03 EVOLVE LED AREA	SINGLE
⬢	16	GE LIGHTING SOLUTIONS- EALS03 EVOLVE LED AREA	BACK TO BACK
⬢	2	GE LIGHTING SOLUTIONS- EVOLVE LED FLOOD LIGHT	SINGLE

LUMENS	WATTS
5270	51.1
40000	305
40000	305
4000	44



GENERAL NOTES:

- A. PLEASE NOTE THIS IS A "PRELIMINARY" DRAWING TO BE USED FOR ELECTRICAL REFERENCE ONLY.
- B. FINAL LIGHT DESIGN TO MEET OR EXCEED LOCAL OR STATE REQUIREMENTS. INCLUDING FOOTCANDLE REQUIREMENTS.
- C. ALL LIGHTING LOCATIONS, DIMENSIONS AND HEIGHTS TO BE FIELD VERIFY BEFORE DESIGN AND CONSTRUCTION.
- D. FINAL LIGHT DESIGN IS RESPONSIBILITY OF THE OWNER.
- E. ELECTRICAL SUPPORT FOR ANY NEW OR EXISTING LIGHTING IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.
- F. FINAL INSTALLATION OF LIGHTS AND ELECTRICAL CONNECTIONS IS THE RESPONSIBILITY OF THE INSTALLER
- G. REMOVAL OF ANY EXISTING LIGHTS IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.
- H. CLEAN, PATCH, SEAL AND PAINT IS THE RESPONSIBILITY OF THE GENERAL CONTRACTOR.

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PROPOSED
LIGHTING F.C.

Project	Radix Growth	Sheet
Date	10.28.2020	12
Scale	1"=50'-0"	

1 PROPOSED LIGHTING F.C. NT

SCALE: 1"=50'-0"

ATTACHMENT C

Project Description

1 Location

The company facility is located at:

Address: **3625 E 18th St. Antioch, CA 94509**

APN: 051-052-094

Zoning: C-3: Service/Regional Commercial District

Zoning Overlay: Cannabis Overlay

Previous Use: Kmart, commercial retail

Project Name: Radix Growth

2 Licenses

The Cannabis licenses that are being applied for based on California Food and Agricultural Division (CDFA), Bureau of Cannabis Control (BCC), and Manufactured Cannabis Safety (MCS) definitions:

- Nursery License
- Indoor Cultivation License
- Type 11 Distribution
- Type 6 Non-Volatile Manufacturing
- Type 10 Retailer

3 Project Introduction

JHP International Trading LLC is seeking a Cannabis Business Use Permit from the City of Antioch Community Development Department to allow a commercial cannabis operation located at 3625 E 18th St, Antioch, CA 94509 (Parcel Number: 051-052-094). The full vertically integrated commercial cannabis business will include a nursery, cultivation, processing, manufacturing, distribution, and storefront retail.

The project parcel is located within the CB zoning overlay and complies with all setback requirements for commercial cannabis. Existing on the parcel is a \pm 94,338 s.f. commercial retail facility which was previously occupied by Kmart from 1992 until November 2018. The existing facility complies with all building standards and no changes to the existing utilities are required. The project proposes minor exterior modifications to include additional security measures and store front signage. The total number of employees is estimated to be 100 and will follow all operating agreement requirements for a cannabis business prior to the start of the facility.

4 Cultivation Operation

4.1 Operating Hours

Hours of operation will be Monday through Sunday 5am to 10pm

Estimated 50 total employees' in this operation. There will be 3 shifts: 5am-2pm, 9am-6pm and 1pm-10pm. The largest shift will be the second shift which will have around 25 employees.

4.2 Overview

The proposed cultivation operation will take place completely indoors, inside of the existing facility. The proposed cultivation will consist of 87 Flower rooms that total 47,715 ft² of floor space, however the cultivation will be a 2 tier grow and therefore the total cannabis cultivation area will be 95,430 ft² (2.19 acres). There are four different size flower rooms in order to efficiently use the existing space while following all compliance standards (please see site plan for details). The flower rooms are custom built rooms that will only house mature cannabis plants. The cultivation medium will consist of an above grade organic soil mixture within hardware trays, placed on a 2-tier mobile vertical rack. Water soluble fertilizers/nutrients will be delivered via the drip and micro-spray irrigation systems of the proposed cultivation operation to promote optimal plant growth and flower formation while using as little product as necessary. The fertilizer/nutrient routine will be based on the 8-week feed cycle from the nutrient manufacturer House & Garden located out of Arcata California (Please see APPENDIX A). Nitrogen supplementation will not exceed 319 pounds/acre/year unless plant tissue analysis performed by a qualified individual demonstrates the need for additional nitrogen application. The analysis will be performed by an agricultural laboratory certified by the State Water Board's Environmental Laboratory Accreditation Program (requirement of the State Water Resource Control Board's Cannabis General Order).

Due to cultivation method being completely indoors with minimal external influence, there will be no storage or use of pesticides. All access points into the cultivation floor area where the flower rooms are located will be equipped with high pressure air curtains. Water will be delivered to the plants using the same micro drip irrigation systems to conserve water resources. The flower rooms will use highly efficient LED lights with a minimum of 25 watts per square foot of canopy space as allowed by CDFA guidelines for Indoor Licenses.

Following the 8-week cultivation cycle outlined above, the mature cannabis plants will be ready to be harvest. The plants are harvested by removing the root and main stem from the rest of the plant. The root and stem are identified as vegetative waste due to their low potency of THC, however it is a key component in the long run for nutrient efficiency. The rest of the cannabis plant will be transported to the drying room located on the mezzanine floor on the north end of

the facility. Inside of the temperature & humidity controlled dry room are movable racks which will hang the cannabis buds. Once dried the buds will be packaged into airtight sealed bins. The bins will then be placed inside of the curing/staging area which will also temperature & moisture controlled.

4.3 Waste Management Plan

The vegetative waste will be trimmed and chipped, transported to the organic waste storage, and mixed with an organic soil mixture. The organic waste storage is located across from the curing area on the north side of the facility. Overtime the vegetative waste will biodegrade into a nutrient dense compost soil. The composted soil will then be tested to measure its nutrient totals before being used to supplement new growth which will ultimately reduce the total amount of fertilizer applied. At no time will organic cannabis waste be disposed of in the trash/non-organic waste.

The cultivation operation will result in some non-organic waste which will include but not be limited to; fertilizer bottles, plastic trays, tubing, soil bags, general equipment/tools needed for cultivation. All non-organic waste will be thrown into designated seal tight bins and disposed of in the dumpster in the northeast corner of the property. There will be no hazardous waste at any time.

As outlined in the Water Resource control board Cannabis Cultivation policy absorbent materials designated for spill containment and spill cleanup equipment will be stored on-site for use in an accidental spill of fertilizers, petroleum products, hazardous materials, and other substances which may degrade waters of the state. The cannabis cultivator shall immediately notify the California Office of Emergency Services at 1-800-852-7550 and immediately initiate cleanup activities for all spills that could enter a waterbody or degrade groundwater. All storage will be within secondary containment to further prevent any spills from degrading any water. As outlined in the CDFA ordinance; An attestation that the local fire department has been notified of the cultivation site if the application is for an indoor license type.

4.5 Pesticide Use

Due to cultivation method being completely indoors with minimal external influence, and all the additional control measures in place there will be no storage or use of pesticides for this project. At no time with there will be fumigation or insecticidal fogging.

4.6 Water Conservation

Due to the federally illegal status of cannabis, the industry is far behind other crops in water use studies. While few exist, it is probable that the resulting water use numbers from these studies are only accurate to a certain degree, particularly as water use is extremely dependent upon the natural conditions of the location where cultivation is taking place. According a study published in 2015 titled “Impacts of Surface Water Diversions for Marijuana Cultivation on Aquatic Habitat in Four Northwestern California Watersheds”, Bauer et al. (2015) determined an individual cannabis plant uses approximately 22.7 liters per day, which translates to roughly 5.99 gallons per day. It has also been documented through CalCannabis’s Final Programmatic Environmental Impact Report that outdoor cannabis uses between 25-35 inches of water per year, based on Hammon et al. (2015). The PEIR also stated that it is comparable to other crops such as corn, tomatoes, alfalfa, and hops. However, projecting cannabis water use in line with that of tomatoes (20 inches per year) would likely be the absolute minimum as the few water use studies published have been more in line with 25-35 inches per year.

It is almost a certainty that water use will differ between projects, based on soil type, irrigation method, and growing method, among other factors. It is this projects goal to minimize water usage in as many ways possible. With indoor cultivation having the capability of temperature and humidity control, water consumption is estimated to be much less than estimated for outdoor cannabis cultivation. As noted in the operations, water will be delivered via micro-drip irrigation system which allows for little to no excess water waste. Additionally, all waterlines will be equipped with inline water meters to continuously measure the consumption of water. Each year efficiencies in water consumption and plant growth will be analyzed to measure if there are any additional ways to conserve water resources.

4.7 Lighting and Energy

All sources of energy used for this cultivation operation will be provided through the existing electrical connections inside of the facility. The existing three phase power will be adequate for the lighting needed. There are no renewable sources of energy proposed at this time.

In accordance with CDFA Indoor licensing regulations, lighting proposed will be greater than or equal to 25 watts per square foot of canopy space. The lighting needed for cannabis cultivation varies greatly depending on the cultivation method as well as strain. It is estimated that this project will use between 25-30 watts per square foot. Energy consumption will be conserved by implementing these additional control measures within the facility:

- Each flower room will have its own lighting control fixture, allowing isolated control of light intensity. The change of light will depend on the timing of the grow cycle.
- All interior facility lights (excluding the flower rooms) will be timed/motion triggered LED lights. This will greatly conserve the amount of total energy consumption for when employees are not present or moving through a certain area.

5 Manufacturing Operation

5.1 Operating Hours

Hours of operation will be Monday through Sunday 5am to 10pm

- Deliveries/Shipments limited to Monday through Saturday 6am-8pm

Estimated 40 total employees' in this operation. There will be 3 shifts: 5am-2pm, 9am-6pm and 1pm-10pm. The largest shift will be the second shift which will have around 20 employees.

5.2 Overview

Cannabis buds that have been cured and are undergoing manufacturing/extraction will be transported in seal tight bins to the manufacturing rooms below the mezzanine. All cannabis product manufacturing will be conducted under such conditions and controls as are necessary to minimize the potential for the growth of microorganisms, allergen cross contact, contamination of cannabis products, and deterioration of cannabis products. To mitigate undesirable organisms the individual rooms will be temperature controlled. Each room will be organized to limit movement of employees between rooms in order to protect against allergen cross contact, contamination, and growth of microorganisms. Employees moving between rooms will be required to sanitize all equipment. Adulterated cannabis products or raw materials will be reprocessed, if appropriate, using a method that has been proven to be effective and subsequently reexamined and found to be unadulterated.

5.3 Process

Manufacturing of the cannabis product will be conducted under a Type 6 manufacturing license which allows for Non-Volatile manufacturing. As defined by the Manufactured Cannabis Safety division, non-volatile solvents include carbon dioxide and ethanol. The project proposes using a closed-loop system equipped with a heated vacuum chamber, which will allow precise control over the substances intended. The closed loop system will not be utilized without prior inspection and approval of the City's Building Official and Fire Code Official. Ethanol will be the primary solvent used in the extraction process for most of the manufacturing, however CO2 extraction techniques do allow for further versatility and maybe used as well. Ethanol extractions are an effective, efficient, and safe method for extracting cannabis oils. The process normally involves multiple stages of filtration, separation, and chromatography. The CO2 extraction process is also a well-known and common technique used in the industry to further refine the terpenoids to increase concentration and potency.

Cannabis extraction broken down to its most basic concept allows for a greater understanding of the process. A cannabis plant that has reached maturity/flower has a variety of biological & chemical compounds within it. The chemical compounds most sought after in cannabis are cannabinoids. There are 100's of cannabinoids within a cannabis plants biology, however THC is one of the most referred to. Each cannabinoid has a different chemical makeup and therefore has different effects when interacting with chemical receptors. The variation in effects from the cannabinoids is what allows the cannabis plant to vary its role medicinally and recreationally. Once the desired chemical compound has been determined, the compound must be removed from the rest of the plant. This extraction process is achieved by having the plant placed into a solvent which allows the chemical compound to dissolve into the solvent. The solvent which is now carrying the compound needs to be diluted to allow only the chemical compound to remain.

Prior to purchasing cannabis extraction equipment, a license is required and therefore, the extraction equipment listed below to be used are not final. However, based on facilities estimated output the following extractors are proposed:

- The CO2 extractor proposed to be used at this time will be the SFE Pro from GreenMill. (Please see APPENDIX C)
- The Ethanol extractor proposed to be used at this time will be X10 MSE Cannabis Extractor from Precision Extraction Solutions. (Please see APPENDIX D)

Both systems proposed meet all MCS standards/requirements. Both Ethanol and CO2 proposed to be used will meet food grade level. If a different model extractor is proposed by the manufacturer, the recommendation will be first approved by the City building official, Fire Code official and the community development department prior to installation and use of the equipment

5.4 Packaging requirements

The product will be packaged to protect the product from contamination and not expose the product to any toxic or harmful substance. It will be packaged in packaging that is sealed so that the contents cannot be opened without obvious destruction of the seal. The package will be child-resistant, and will cannot imitate any package used for products typically marketed to children. All edibles should be packaged in opaque packaging. If the package contains more than one serving of cannabis product, the package must be re-sealable so that child-resistance is maintained throughout the life of the package.

A label, or primary panel will be then placed on the finished products. Primary panel will include labeling that:

1. The identity of the product.
2. The amount of THC/CBD in the package.
3. The CDPH-issued universal symbol
4. The net weight or volume

5.5 Transportation requirements

Once the product is ready to be transported the product will be taken to the interior secure loading docks. The inventory will be recorded on the shipping document prior to leaving the facility:

- a. Name and type of the cannabis goods.
- b. Unique identifier of the cannabis goods.
- c. Amount of the cannabis goods, by weight or count.
- d. Date and time of the activity or transaction.
- e. Name and license number of other licensees involved in the activity or transaction.

Upon pick-up or receipt of cannabis goods for transport, storage, or inventory, a licensee shall ensure that the cannabis goods received are as described in the shipping manifest and shall record acceptance and acknowledgment of the cannabis goods in the track and trace system. If there are any discrepancies between the type or quantity specified in the shipping manifest and the type or quantity received by the licensee, the licensee shall record and document the discrepancy in the track and trace system and in any relevant business record.

All products will be generated through the track and trace system. The company will be using the Trellis Software which integrates all compliance and performance sheets related to the track and trace into a digital platform. (Please see APPENDIX E)

The total number of trips for deliveries will not exceed 6 per day. All deliveries will be scheduled within normal business hours in order to safely and accurately transport goods while employees are on site.

5.6 Track and Trace

The company will designate an inventory control specialist to be the track and trace system account manager. The account manager may authorize additional employees as track and trace system users and shall ensure that each user is trained on the track and trace system prior to its access or use. The account manager shall attend and successfully complete all required track and trace system training, including any orientation and continuing education. If the account manager did not complete the required track and trace system training prior to receiving their

annual license, the account manager shall sign up for and complete state mandated training, as prescribed by the Bureau, within five business days of license issuance. The account manager and each user shall be assigned a unique log-on, consisting of a username and password. The account manager or each user accessing the track and trace system shall only do so under his or her assigned log-on and shall not use or access a log-on of any other individual. No account manager or user shall share or transfer his or her log-on, username, or password, to be used by any other individual for any reason. The account manager shall maintain a complete, accurate, and up-to-date list of all track and trace system users, consisting of their full names and usernames.

The company will record in the track and trace system, all commercial cannabis activity, including any:

- (1) Packaging of cannabis goods.
- (2) Sale of cannabis goods.
- (3) Transportation of cannabis goods to a licensee.
- (4) Receipt of cannabis goods.
- (5) Return of cannabis goods.
- (6) Destruction and disposal of cannabis goods.
- (7) Laboratory testing and results.
- (8) Any other activity as required pursuant to this procedure or by any other licensing authority.

The following information shall be recorded for each activity entered in the track and trace system:

- (1) Name and type of the cannabis goods.
- (2) Unique identifier of the cannabis goods.
- (3) Amount of the cannabis goods, by weight or count.
- (4) Date and time of the activity or transaction.
- (5) Name and license number of other licensees involved in the activity or transaction.
- (6) If the cannabis goods are being transported, that is was done by a licensed distributor.

All transactions will be entered into the track and trace system by 4pm on the day the transaction occurred. As previously mentioned, the Trellis System will be used to comply with all the track and trace requirements.

6 Retail Operation

6.1 Hours of Operation

Hours of operation will be Monday through Sunday 8am to 8pm.

Estimated 10 total employees' in this operation. There will be 2 shifts: 8am-5pm and 11am-8pm. The largest shift will be the second shift between 11am-6pm which will have around 8 employees.

6.2 Overview

The Retail operation is situated in a way to serve customers efficiently and effectively while being fully secure. The storefront is located directly at the forefront of the facility to ensure customers can easily identify where to enter. There is only 1 single access for customers inside of the store. However, the retail store is connected to the rest of the facility on the interior through a security office. This security office will manage the retail area and be connected to the storage room. This security office will also be the tracking point for product that has been packed and labeled to then enter the retail area.

The signage for the storefront is yet to be determined but will only include lettering and no symbols or designs. The sign will not exceed the existing storefront signage and will be proposed to the Community Development Department for design review prior to implementation.

6.3 Access to Retail

Immediately upon entering the storefront the customer will be kindly greeted by the security guard on duty. The security guard will grant access to the rest of the retail area to purchase cannabis goods only after he/she has confirmed the individual's age and identity pursuant to section 5404 of state regulations. Acceptable forms of identification include the following:

- A document issued by a federal, state, county, or municipal government, or a political subdivision or agency thereof, including, but not limited to, a valid motor vehicle operator's license, that contains the name, date of birth, height, gender, and photo of the person.
- A valid identification card issued to a member of the Armed Forces that includes the person's name, date of birth, and photo.
- A valid passport issued by the United States or by a foreign government.

At all times during business operating hours, at least 1 employee and 1 security officer will be present. All sales will take place inside of the retail area under video surveillance and only behind the cash counter. At no time will there be any drive through, drive-up or walkup window services. When the operation is not open for business, the premise will be locked with commercial grade nonresidential door locks. An active alarm system will be linked to premises and activated when an employee is not on the premise.

As part of site managers duties, he/she will be trained to periodically inspect the storefront and parking lot. Any congregation or nuisances taking place on the retail premises will be highly discouraged. The site manager will make reasonable steps to stop congregation whether it be speaking to the individual(s) or calling police if he/she feels unsafe. In addition, all employee's final duty before being relieved of their shift will be to walk the retail area to dispose of any trash and identify the supervisor on duty of any potential concerns they may find.

6.4 Sales of product

Cannabis goods will not be available for sale or delivery to a customer unless:

- The cannabis goods have not exceeded their best by, sell-by, or expiration date if one is provided.
- The cannabis goods have undergone laboratory testing.
- The batch number is labeled on the package of cannabis goods and matches the batch number on the corresponding certificate of analysis for regulatory compliance testing
- The packaging and labeling of the cannabis goods meets all compliance measures.

The retail store will have daily limits set in place to comply with all state standards. The store will not sell more than the following amounts to a single adult-use cannabis customer in a single day:

- 28.5 grams of non-concentrated cannabis.
- 8 grams of cannabis concentrate, including cannabis concentrate contained in cannabis products.
- 6 immature cannabis plants.

Cannabis goods for inspection and sale will only be displayed in the retail area. Cannabis goods may be removed from their packaging and placed in containers to allow for customer inspection. The containers will not be readily accessible to customers without assistance of staff. Cannabis goods removed from their packaging for display will not be sold, consumed, and will be destroyed when the cannabis goods are no longer used for display.

6.5 Retail Delivery

All deliveries of cannabis goods will be performed by a delivery employee who is at least 21 years of age and will be directly employed the company. All deliveries of cannabis goods shall be made in person and only to a physical address in California. At no time will delivery be made to a school providing instruction in kindergarten or any grades 1 through 12, day care center, or youth center.

The process of delivery begins when the delivery employee leaves the retailer's licensed premises with the cannabis goods for delivery. The process of delivering ends when the delivery employee returns to the retailer's licensed premises after delivering the cannabis goods, or attempting to deliver cannabis goods, to the customer(s). During the process of delivery, the delivery employee will not engage in any activities except for cannabis goods delivery and necessary rest, fuel, or vehicle repair stops. The delivery employee will carry a copy of the retailer's current license, the employee's government-issued identification, and an identification badge provided by the company. Prior to providing cannabis goods to a delivery customer, the employee will confirm the identity and age of the delivery customer. All trackable details of the delivery from the moment the delivery employee leaves the retail store to his/her return will be recorded and preserved.

At this time, it is estimated that no more than 4 transportation vans will be used for delivery. The delivery vehicle shall be a fully vehicle with no markings or indications on the exterior that would indicate cannabis goods are being delivered. All cannabis goods will be stored inside of a fully enclosed locked container out of view from the exterior. The delivery employee will not leave the cannabis goods unattended inside of vehicle without first locking the container and locking the vehicle to ensure the alarm is active. The vehicle will be equipped with a GPS tracking system that will record each trip and maintain the record for a minimum of 90 days.

7 Odor Control Plan

7.1 Purpose

The Odor Control Plan is intended to maintain the air quality surrounding the commercial cannabis business by managing the emissions through best management practices. This Odor Control Plan will detail the mitigation techniques used to lessen or remove the negative externalities, in relation to odor and air quality, that stem from this commercial cannabis cultivation project. Although some odor mitigation techniques may have been discussed, this section will outline all measures for every department.

7.2 Cultivation Odor Mitigation

Cannabis cultivation can generate objectionable odors, particularly when the plants are mature/flowering. Therefore, each flower room will be seal tight and equipped with its own intake and ventilation system. The ventilation system will include Phresh Intake Filters, which are nano carbon air filters/scrubbers (please see APPENDIX B). Activated carbon works by allowing contaminated air stream to pass through the pores of the filter, which allows the carbon to absorb the odorous chemicals in the air stream. Based on the manufacture's calculations for the proposed flower room sizes, 3 Phresh Intake filters 8 inches x 16 inches in 750 CFM (Part # HGC70175 on website) is recommended. Per the manufacturing details 99% of all particulates including odor, fibers, insects, and debris will be filtered. Please see attached Phresh information sheet, further specifications can be seen online at Phreshfilter.com.

All flower rooms will have a single entrance which will be equipped with a solid swinging door and a high-pressure air curtain. Air curtains are proven to be a very effective barrier to odors as well as small particulates that can otherwise escape while the doors are open.

All air filtration and odor mitigation equipment will be inspected every other month by a compliance supervisor to ensure each one is running as efficiently as possible. All carbon filters/air scrubbers will be replaced if failing or as noted by the manufacturer. Supervisory staff will log and maintain accurate records of the replacement/repairs to any odor mitigation system and retain records for at least three years.

Drying rooms and curing rooms will hold mature/flowered cannabis which will generate strong odors. The strategic location of both the dry and curing room being placed in the rear of the facility, creates a physical barrier through distance and walls. Each of these rooms will be

equipped with the same nano carbon filters and air curtains. Due to the nature of both these rooms, the amount of traffic in and out is minimal.

7.3 Manufacturing Odor Mitigation

The manufacturing facility contains multiple rooms that are secluded from the rest of the facility which will minimize the traffic into these rooms and reducing the amount of odor escaping. All rooms within the facility will be equipped with an air filtration system that will be equipped with the carbo. Additionally, the access into the manufacturing facility area will be installed with brand new airtight doors to further reduce any odor.

7.4 Retail Odor Mitigation

The retail store will be completely walled off from the rest of the facility, with only 1 room (security room) connecting them. This separation will mitigate for any of the odors that may have bypassed all of the other mitigation systems in place for the other departments. The security room doors on both ends will be airtight sealed and only be opened on both ends for deliveries of product.

The existing storefront is equipped with an entrance into the building, and an additional door to enter the rest of the facility. The company will utilize this 2-door entrance to further mitigate the escape of any odors that may be present although a negligible amount is estimated. The entire retail area will be under one system which will include at minimum a roof mounted exhaust fan and a carbon filter. There are no windows, or other access points where odor would be able to escape from the building.

7.5 Odor Complaint Form

It is encouraged for anyone in the public to notify the facility immediately if they experience any negative odors from outside of the facility. Odor complaints are taken very seriously and will be pursued in a matter to immediately identify and resolve the situation. Prior to the facility operating, the business will have a website that will include an Odor Complaint Form. The form will include at minimum the following information:

- First name (required), Last Name
- Date and time of negative odors being experienced (required)

- Location of where you were when experiencing the odor (required)
- Contact information:
 - Email or phone number (one is required)
- Additional comment section

The Odor complaint form once completed will be sent to the companies email with an urgent notification on it, where any company supervisor on duty will have access to view it. Action will be taken immediately to inspect what part of the facility is lacking in filtration. The facility manager will be required to contact the individual who filed the odor form to ensure that action is being taken, has been taken, and or to see if the odors are still being experienced. Additionally, a phone number will be listed for instant odor complaints from the public.

All complaints will be maintained for 1 year and reviewed annually by the managerial staff to determine if further improvements need to be done.

ATTACHMENT D

Neighborhood Responsibility Plan

Neighborhood Responsibility Plan

Mission Statement

- We are committed to actively engage as a leader in the advancement of the individuals and businesses in the community by fostering a welcoming and safe environment for all.

Goals

- Create a welcoming environment to all.
- Provide ways to facilitate wealth & education.
- Commit to promoting community safety standards.

Our Approach

Public Education

- With a portion of the cannabis business being storefront retail, we will be a public source of knowledge for anyone interested in learning more about the cannabis industry. Educating customers on the safe and responsible consumption of marijuana is essential to the success of the marijuana industry. By providing a knowledge-based service approach we welcome both novices and experts to help educate one another of the industry as it continues to develop. We believe education is the most important piece of every customer interaction.

Investing in the Community

- Should Radix Growth be awarded a business license, we are committed to offering competitive wages and health benefits to our employees and contribute to the prosperity of the local community. Through proper and comprehensive training, we will prepare prospective employees for success. Radix Growth pledges to invest in local suppliers, vendors, and businesses whenever possible.

Local Safety Improvements

- Security is of the utmost importance to Radix Growth and is also a major requirement of the CalCannabis standards. Radix Growth will be equipped with numerous safety measures to ensure the safety of customers, employees and the surrounding areas. As part of the project we have proposed integrating surveillance systems that allow for the City of Antioch's Police Department to actively monitor the surroundings of the facility. With the increased surveillance of the area, all criminal activity, regardless of its association with the business, can be reported directly to the Police Department.
- All waste cannabis products are to be made unusable and unrecognizable prior to disposal. In addition to our facility being fully fenced off and secured, our dumpster will remain locked and under surveillance to prevent any unauthorized attempts to access waste products.
- We intend to continue our culture of cooperation with local authorities in all matters of safety for our community.

Public Relations

- We will remain accessible to local, national and international media, offering tours and education to reporters as requested. This will significantly help improve the general public's understanding regarding marijuana topics. Our hope is to use this platform to educate on recreational consumption and to eliminate the stereotypes that are common within the industry.

Economic Development

- Radix growth will commit to working with the City of Antioch's departments to reinvest in city infrastructure to further promote the development of businesses and jobs to the area.

Community Outreach

- Community members/customers are encouraged to express their comments and concerns directly to the Community Outreach Manager. The Community Outreach Manager's contact

information will be posted at the store and also on our website. For details on the procedure, please refer to the “Business Management Plan.”

Continuous Growth

- As the City of Antioch continues to change overtime, so will our approach to our community outreach strategies. We understand that as we develop as a community, certain priorities will be brought to our forefront to address, which will take precedence over other topics. We will hold an annual forum to allow the community to directly voice the changes they would like to see us implement within Radix Growth and our involvement in the City of Antioch. Our ability to change will be dependent on the consistent engagement with the community such that we can learn what matters most and best serve their needs. We want all who visit and interact with Radix Growth to feel heard and part of a common goal to benefit our local neighborhood and individuals.

ATTACHMENT E

Fire District Comment Letter



December 23, 2020

Mr. Scudero
City of Antioch
Community Development
PO Box 5007
Antioch, CA 94531-5007

Subject: Radix Growth Cannabis
3625 E. 18th St. Antioch
Project # UP-20-10
CCCFPD Project No.: P-2020-05219

Dear Mr. Scudero:

We have reviewed the land use permit application to convert an existing one story, with a mezzanine, unknown size or construction type, mercantile building in to a cannabis retail, cultivation, manufacturing and distribution facility at the subject location. The following is required for Fire District approval in accordance with the 2019 California Fire Code (CFC), the 2019 California Building Code (CBC), the 2019 California Residential Code (CRC), and Local and County Ordinances and adopted standards:

1. Access shall comply with Fire District requirements.

Provide emergency apparatus access roadways with all-weather (paved) driving surfaces of not less than 20-feet unobstructed width, and not less than 13 feet 6 inches of vertical clearance, to within 150 feet of travel distance to all portions of the exterior walls of every building. Access shall have a minimum outside turning radius of 45 feet, and must be capable of supporting the imposed fire apparatus loading of 37 tons. (503) CFC

2. Access roadways of **less than 28-feet** unobstructed width shall have signs posted or curbs painted red with the words **NO PARKING – FIRE LANE** clearly marked. (22500.1) CVC, (503.3) CFC

Access roadways of **28 feet or greater, but less than 36-feet** unobstructed width shall have **NO PARKING – FIRE LANE** signs posted, allowing for parking on one side only or curbs painted red with the words **NO PARKING – FIRE LANE** clearly marked. (22500.1) CVC, (503.3) CFC

3. The gate configuration on the south east corner of the building may not comply with Fire District Standards

Access gates for Fire District apparatus shall be a minimum of 20-feet wide. Access gates shall slide horizontally or swing inward and shall be located a minimum of 30 feet from the street. Electrically operated gates shall be equipped with a Knox Company key-operated switch. Manually operated gates shall be equipped with a non-casehardened lock or approved Fire District lock. Contact the Fire District for information on ordering the key-operated switch. (D103.5) CFC.

4. The developer shall provide an adequate and reliable water supply for fire protection as set forth in the California Fire Code. (507.1) CFC
5. A land development permit is required for access and water supply review and approval prior to submitting building construction plans.

The developer shall submit a minimum of two (2) copies of full size, scaled site improvement plans indicating:

- All existing or proposed hydrant locations,
- Fire apparatus access,
- Elevations of building,
- Size of building and type of construction,
- Striping and signage plan
- Proposed fence and gates

This is a separate submittal from the building construction plans. These plans shall be approved prior to submitting building plans for review. (501.3) CFC

6. Changes of use or occupancy. Changes shall not be made in the use or occupancy of any structure that would place the structure in a different division of the same group or occupancy or in a different group of occupancies, unless such structure is made to comply with the requirements of this code. (§102.3) CFC
7. Flammable or combustible liquid storage tanks shall **not** be located on the site without obtaining approval and necessary permits from the Fire District. (3401.4) CFC
8. The owner or the owner's authorized agent shall be responsible for the development, implementation and maintenance of a written plan establishing a fire prevention program at the project site applicable throughout all phases of the construction. The plan shall be made available for review by the fire code official upon request. (Ch.33) CFC
9. The fire prevention program superintendent shall develop and maintain an approved prefire plan in cooperation with the fire chief. The fire chief and fire code official shall be notified of changes affecting the utilization of information contained in such prefire plans. (Ch.33) CFC
10. The developer shall submit a minimum of two (2) complete sets of tenant improvement plans and specifications of the subject project, including plans for any of the following required deferred submittals, to the Fire District for review and approval **prior to** construction to ensure compliance with minimum requirements related to fire and life safety. Plan review and inspection fees shall be submitted at the time of plan review submittal. (105.4.1) CFC, (901.2) CFC, (107) CBC
 - Fire sprinklers
 - Fire alarm
 - Special suppression systems
 - Gas Detection system if CO2 enrichment process is used

Our preliminary review comments shall not be construed to encompass the complete project. Additional plans and specifications may be required after further review.

If you have any questions regarding this matter, please contact this office at (925) 941-3300.

Sincerely,



Todd Schiess
Fire Inspector I

cc: Hans Benson
429 Oak Park Dr.
hansbenson83@gmail.com

File: 3625 E 18TH ST-PLN-P-2020-05219



PROJECT REFERRAL – REQUEST FOR REVIEW

PROJECT: Radix Growth Cannabis, UP-20-10
DATE OF REQUEST: 12/11/2020
SUBMIT COMMENTS TO: Kevin Scudero (kscudero@ci.antioch.ca.us)
COMMENTS DUE BY: **** January 4, 2020 ****

The City of Antioch Planning Division is requesting that your agency review these plans and provide your feedback on availability of services, potential design or code conflicts, requirements for additional permits, and recommended conditions of project approval.

Development plans and related information for the project identified above, can be accessed at:
<https://www.antiochca.gov/fc/community-development/planning/ProjectDOCs/UP-20-10.pdf>

Project status and other information can be accessed online from our [Current Project List](#) under the project's name.

Project No: UP-20-10, AR-20-12, V-2002	Application Type: Use Permit, Design Review, Variance
Address: 3625 E 18th St	
Project Description: Use Permit for a cannabis retail, cultivation, manufacturing and distribution facility	
Applicant Name: Hans Benson	
Mailing Address: 429 Oak Park Drive	
Phone: 415-706-2521	E-mail: hansbenson83@gmail.com

RECEIVED
DEC 11 2020

CONTRA COSTA FIRE DISTRICT

Phone: (925) 779-7035
Fax: (925) 779-7034
Antiochca.gov

COMMUNITY DEVELOPMENT DEPARTMENT



200 H Street
Antioch, CA. 94509
AntiochIsOpportunity.com

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