

ES-1 Introduction

The purpose of the Executive Summary and impact summary table is to provide the reader with a brief overview of the Cannabis Land Use Ordinance and Licensing Program (Project) proposed by the County of Santa Barbara (County). The County Planning and Development Department, as lead agency under the California Environmental Quality Act (CEQA), has prepared this Environmental Impact Report (EIR) in accordance with CEQA, Public Resources Code (PRC) Sections 21000 et seq., the State of California CEQA Guidelines, California Code of Regulations (CCR), and Title 14, Sections 15000 et seq. to address the potential environmental impacts of the Project.

This EIR is an informational document that may be used by the public and governmental agencies to review and consider the environmental effects of the Project as part of its decision-making process. The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the Project and its alternatives. The complete EIR should be consulted for specific information about the environmental effects and the implementation of required mitigation measures, consistent with CEQA.

This EIR is considered a Program EIR, and due to the expansive nature of the Project and programmatic implementation, is characterized and examined as a Program EIR prepared pursuant to §15168 of the State CEQA Guidelines. As a Program EIR, the level of detail included in the project description and methodology for impact analysis is relatively more general than a project-level EIR, as individual cannabis activity site-level details are not available for prospective license applications or would be considered too speculative for evaluation. This approach allows the County Board of Supervisors to consider broad implications and impacts associated with the Project while not requiring a detailed evaluation of individual properties. Methods to analyze the Project's environmental effects consider cumulative cannabis activity (e.g., cultivation, distribution, manufacturing, processing, retail operations, testing, etc.) or site development under the Project, or a reasonable buildout scenario for a particular resource area (see also, Section 3.0, *Introduction and Approach to Analysis*). This EIR may be incorporated by reference in subsequent CEQA review documents to describe regional influences, secondary effects, cumulative impacts, and other broad factors that apply to the Project as a whole.

ES-2 Project Overview

The County of Santa Barbara (County) seeks to adopt the Cannabis Land Use Ordinance and Licensing Program (Project) to license and regulate commercial cannabis businesses consistent with required State of California licensing regulations. In September of 2015, the state approved Medical Marijuana Regulation and Safety Act (MMRSA), which established California's first statewide regulatory system for medical cannabis businesses. In November 2016, California voters approved Proposition 64 for the Adult Use of Marijuana Act (AUMA), which legalized the personal (non-medical) use and cultivation of cannabis for adults 21 years or older. In June 2017, the California Legislature passed Senate Bill 94 for the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), which

effectively combines MMRSA and with AUMA to create a hybrid regulatory structure to address both medical and recreational cannabis activities under the state's pending licensing program.

Current County regulations address medical cannabis cultivation only for personal use and limited commercial, medicinal activity. Article X, *Medical Marijuana Regulations* of the County Code entirely prohibits cultivation and/or processing of cannabis with only two exceptions: (1) cultivation may occur for personal medical use, and (2) medical cannabis cultivators operating legally under California state law as of January 19, 2016, are considered legal nonconforming uses. Existing County zoning ordinances state that medical marijuana dispensaries are not allowed in any zone district in the unincorporated areas of the County.

The Project would be compliant with MAUCRSA with appropriate regulations to safeguard the public health, safety, and general welfare. The Project would also provide County-specific regulations addressing cannabis licensing activities in the unincorporated portions of the County while providing standards to address neighborhood compatibility concerns, adequacy of services and utilities, and protection of natural resources. The Project involves new regulations governing commercial cannabis activities including cultivation and processing, product manufacturing, distribution, testing, and retail in the unincorporated areas of the County. The Project does not address personal use cannabis activities, given that state law has decriminalized the personal (non-medical) use of cannabis; this decision does not preempt federal prohibition of the use or possession of cannabis, and does not prevent federal law enforcement officers from enforcing federal law.

ES-3 Summary of Project Objectives

The California Environmental Quality Act (CEQA) Guidelines require that the EIR project description include a statement of objectives sought by the Project. The primary objectives of the Project are to:

1. Develop a robust and economically viable legal cannabis industry to ensure production and availability of high quality cannabis products to help meet local demands, and, as a public benefit, improve the County's tax base;
2. Provide opportunities for legal commercial cannabis cultivation, testing, packaging, transportation, distribution, manufacturing, and retail sale in appropriate unincorporated areas of the County, consistent with state law and County regulations;
3. Develop a new regulatory program allowing for the orderly development and oversight of commercial cannabis activities and businesses, consistent with state law and existing agricultural industry practices, standards, and regulations;
4. Encourage commercial cannabis businesses to operate legally and secure a license to operate in full compliance with County and state regulations, maximizing the proportion of licensed activities and minimizing unlicensed activities;
5. Provide an efficient, clear, and streamlined commercial cannabis licensing and permit process and attainable regulations and standards to facilitate participation by commercial cannabis business in the unincorporated areas of the County;
6. Minimize adverse effects of commercial cannabis activities on the natural environment, natural resources, and wildlife, including riparian corridors, wetlands, sensitive habitats, and water resources;

7. Promote energy and resource efficiency in all cannabis activities, consistent with existing agricultural and other industry practices, standards, and regulations;
8. Establish land use requirements for commercial cannabis activities to minimize the risks associated with criminal activity, degradation of visual resources and neighborhood character, groundwater basin overdraft, obnoxious odors, noise nuisances, hazardous materials, and fire hazards;
9. Develop a regulatory program that protects the public health, safety, and welfare through effective enforcement controls (i.e., ensuring adequate law enforcement and fire protection services) for cannabis activities in compliance with state law, to protect neighborhood character and minimize potential negative effects on people, communities, and other components of the environment; and
10. Limit potential for adverse impacts on children and sensitive populations by ensuring compatibility of commercial cannabis activities with surrounding existing land uses, including residential neighborhoods, agricultural operations, youth facilities, recreational amenities, and educational institutions.

ES-4 Scope of the Environmental Impact Report

This EIR assesses the potential environmental impacts that could occur with implementation of the Project. The EIR evaluates potentially significant environmental impacts including issues raised in public comments received in response to the Notice of Preparation (NOP) and at public workshops/hearings. (See Appendix A; NOP and Public Comments.) This scoping process determined that the EIR should analyze the following issues:

- Aesthetics and Visual Resources
- Agricultural Resources
- Air Quality and Greenhouse Gas (GHG) Emissions
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Public Safety
- Hydrology and Water Resources
- Land Use and Planning
- Noise
- Public Services
- Transportation and Circulation
- Utilities and Energy Conservation

- Population, Employment, and Housing

(See Section 3.0, *Environmental Impact Analysis*.)

This EIR addresses the issues referenced above and identifies potential environmental impacts associated with the Project, in accordance with the provisions of the State CEQA Guidelines. The EIR recommends feasible mitigation measures where necessary that would reduce or eliminate adverse environmental effects. In accordance with State CEQA Guidelines Section 15128 (Effects Not Found to Be Significant), environmental impacts related to Mineral Resources and Recreation would be insignificant and, therefore, are not fully discussed in this EIR. (See Chapter 5, *Other CEQA Considerations* of this EIR.)

Consistent with the State CEQA Guidelines [Section 15126.6(d)], this EIR assesses a reasonable range of alternatives to the Project, including alternatives that could feasibly attain most of the basic objectives while avoiding or substantially lessening one or more of the significant effects of the proposed Project. See Section 4.0, *Alternatives*.

This EIR examines potential direct, indirect, secondary, and cumulative impacts of the Project. These impacts were determined through a rigorous process mandated by CEQA in which existing conditions are compared and contrasted with conditions that would exist once the Project is implemented. The significance of each identified impact was determined using either CEQA thresholds informed by local thresholds of significance. The following categories are used for classifying Project-related impacts.

- **Class I - Significant Unavoidable Adverse Impacts:** Significant impacts that cannot be feasibly mitigated or avoided. No measures could be taken to avoid or reduce these adverse effects to achieve insignificant or negligible levels. Even after application of feasible mitigation measures, the residual impact would be significant. If the Project is approved with significant and unavoidable impacts, decision-makers are required to adopt a Statement of Overriding Considerations pursuant to CEQA Section 15093 explaining why benefits of the Project outweigh the potential damage caused by these significant unavoidable impacts.
- **Class II - Significant but Mitigable Adverse Impacts:** Such impacts can be reduced to a less than significant level with feasible mitigation, which can include incorporating changes to the Project. If the proposed Project is approved with significant but mitigable impacts, decision-makers are required to make findings pursuant to CEQA Section 15091, stating that impacts have been mitigated to the maximum extent feasible and the residual impact would not be significant.
- **Class III - Adverse but Insignificant Impacts:** These adverse but less than significant impacts do not require mitigation, nor do they require findings be made. Mitigation measures may be recommended to further reduce environmental effects and/or improve consistency with policies in the Santa Barbara County General Plan and regulations of the SCCC.
- **Class IV - Beneficial Impacts:** Effects that are beneficial to the environment.

For each significant impact identified, mitigation to reduce impacts to less than significant levels are identified. In those instances where mitigation measures cannot reduce such impacts to less than significant levels, the impacts are identified as *significant and unavoidable*.

The EIR also presents alternatives to the Project, which include the No Project Alternative, Alternative 1 - Exclusion of Cannabis Activities from the AG-I Zone District Alternative, Alternative 2- Preclusion of Cannabis Activities from Williamson Act Land Alternative, and Alternative 3 - Reduced Registrants

Alternative, with a comparative assessment of impacts that would be associated with the implementation of each compared to the Project.

ES-5 Notice of Preparation

The County issued an NOP on July 12, 2017, to request comments on the scope of the EIR. The NOP was published online at <http://longrange.sbcountyplanning.org/programs/cannabis/cannabis.php> and circulated to relevant agencies, community organizations, and interested individuals in the County. The NOP was also posted in the Santa Barbara County Clerk's office for 30 days and sent to the State Clearinghouse at the Governor's Office of Planning and Research to solicit statewide agency participation in determining the scope of the EIR. Two public scoping workshop meetings were held separately on Wednesday, July 26, 2017, in Santa Barbara and on Thursday, July 27, 2017, in Santa Maria. A 30-day public comments period closed on August 11, 2017. Appendix A contains the NOP and comments and input received during the review period which was considered in preparing the scope of this EIR (CEQA Guidelines Section 15082).

ES-6 Notice of Completion

In accordance with Section 15085 of the state CEQA Guidelines, the Notice of Completion (NOC) was prepared and distributed to responsible and affected agencies and other interested parties for a 45-day public review along with the Draft EIR. The public review period for the NOC and Draft EIR began on October 2, 2017, and ended on November 16, 2017. The NOC was also posted in the Santa Barbara County Clerk's office and sent to the State Clearinghouse at the Governor's Office of Planning and Research to solicit statewide agency review and comment of the Draft EIR.

ES-7 Summary of Project Impacts

The significance of each impact resulting from implementation of the Project has been determined according to CEQA thresholds and local standards. Table ES-1 presents a summary of the impacts, mitigation measures, and residual impacts from implementation of the Project.

Based on the analysis presented in this EIR, implementation of the proposed Project would create significant and unavoidable direct or indirect impacts to agricultural resources, air quality and greenhouse gases, noise, and transportation. The Project could result in the loss of prime soils due to the allowable installation of greenhouses and similar agricultural structures for agricultural uses. Though site by site development may not result in significant loss of soils, the cumulative effect of all potential agricultural development pursuant to the Project may result in a significant amount of prime soil loss. Despite the use of mitigation to minimize the potential for siting new development on prime farmland, impacts would remain *significant and unavoidable*. While permit review of each cannabis operation would help to ensure proposed sites are designed, constructed, and operated to minimize air pollution consistent with the County General Plan and County Code, cannabis activities may occur throughout eligible areas of the County and involve generation of emissions from increased vehicle trips that may exceed thresholds and degrade regional air quality, with nominal additional emissions from ongoing stationary operations. Despite implementation of mitigation to reduce site by site transportation trips and associated air quality impacts, these impacts would remain *significant and*

unavoidable. Additionally, although the scent of cannabis plants can produce a variety of odors, especially during the flowering phase, which is often considered and perceived by some individuals as objectionable or offensive. Despite mitigation implementation, this nuisance may not be entirely removed and this impact would remain *significant and unavoidable*. With implementation of the Project, future long-term increases in roadway noise and congestion could result in impacts to sensitive receptors. Despite implementation of mitigation to reduce site by site transportation trips, impacts would remain *significant and unavoidable*. Lastly, the Project would increase traffic volumes such that new traffic would reasonably be dispersed to intersections located outside of the County's jurisdiction (i.e., Caltrans facilities), which currently and are projected to operate at or near deficient levels of service (LOS); therefore, the Project may contribute towards an exceedance in LOS or exacerbate existing deficient LOS. Also associated with traffic, the Project has the potential to create or exacerbate hazardous road conditions from the generation of traffic along roadways, which can be lightly maintained, be narrow, support use by larger, slower moving vehicles, have poor line-of-sight, have obstructed emergency access, and/or experience other potentially hazardous conditions such that impacts would be *significant and unavoidable*, despite implementation of mitigation measures.

Further, this EIR programmatically analyzes the impacts of the Project associated with unregulated and unlicensed cannabis activities in the County. These impacts may create significant and unavoidable impacts to all resource areas, as analyzed in Chapter 5, *Other CEQA Considerations*, except for aesthetics and visual resources, which would have less than significant secondary impacts. This is because it is not possible for the County to completely eradicate all unregulated cannabis activity. These illegal activities would not necessarily adhere to existing County regulators and/or mitigation measures in this EIR, and could therefore cause significant adverse impacts due to practices such as not following grading restrictions and causing erosion, using chemicals hazardous to biological resources, diverting streams and causing water supply and quality issues, and using diesel generators that contribute to air pollution and GHGs. This EIR notes that it is not possible to bring all unregulated cannabis activity into compliance with the Project, and these impacts remain *significant and unavoidable*.

The reasons why the Project is being proposed, notwithstanding the significant impacts, are related to the Program objectives stated above in ES-3, *Summary of Project Objectives* and in Section 2.3.2, *Project Objectives*. As indicated, the Project is being proposed to regulate cannabis cultivation, manufacturing, distribution, testing, and sale of cannabis products within the County in a manner consistent with state law, and encourages cultivators and manufacturers to operate legally and secure a license to operate in full compliance with County regulations, meet the local demand of cannabis products, improve the County's tax base, and prevent impacts of cannabis activities on children, sensitive populations, the natural environment, and public health and safety.

ES-8 Summary of Cumulative Impacts

"Cumulative Impacts," (CEQA Guidelines Section 15130) describes impacts that could occur from the combined effect of other past, present, and reasonably foreseeable future projects. For each significant adverse impact identified, mitigation measures are presented where feasible to reduce the impacts to acceptable levels. Cumulative impacts were determined to be *less than significant* for aesthetic and visual resources; biological resources; cultural resources; geology and soils; hazards and hazardous materials; hydrology and water quality; land use; public services; utilities and energy conservation; and population, employment, and housing. Cumulative impacts were determined to be considerable

and *therefore significant and unavoidable* on agricultural soil resources, air quality operational effects, noise, and cumulative traffic impacts. (See Section 3.3, *Air Quality*, Section 3.13, *Transportation and Circulation*, and Section 3.15, *Other CEQA Issues*).

ES-9 Environmentally Superior Alternative

In addition to the Project scenario addressed within the main analysis in Section 3.0 of this EIR, alternatives selected for analysis include:

- No Project Alternative
- Alternative 1 — Exclusion of Cannabis Activities from the AG-I Zone District Alternative
- Alternative 2 — Preclusion of Cannabis Activities from Williamson Act Land Alternative
- Alternative 3 — Reduced Registrants Alternative

Each alternative analyzed in Chapter 4, *Alternatives* was evaluated based on significance criteria, location, extent and magnitude of impacts, potential benefits, and relative impacts in comparison to other alternatives. The alternative with the fewest adverse impacts is thereby considered the Environmentally Superior Alternative.

The Project and Alternatives 1 and Alternative 2 would result in significant and unavoidable impacts to agricultural resources, air quality, noise, and transportation and circulation, and only Alternative 3 would reduce impacts to agricultural resources to a less than significant level. The Project, Alternative 1, Alternative 2, and Alternative 3 all contain fewer significant impacts than the No Project Alternative. As such, the No Project Alternative is eliminated from consideration for the Environmentally Superior Alternative. Compared to the Project, Alternative 1 would generally lessen impacts within the urbanized areas of the County and reduce land use compatibility impacts, though it could create more impacts associated with rural development. However, compared to the Project, Alternative 2 could create more impacts associated with land use compatibility by increasing cannabis activities within urbanized areas, and reducing impacts of potential development on rural agricultural lands. Compared to the project, Alternative 3 would generally result in less severe impacts due to the limited extent of cannabis development and the number of licenses issued by the County while reducing the severity of impacts to agricultural resources.

Based on the information in this EIR, Alternative 3 is identified as the Environmentally Superior Alternative. While Alternative 3 would not meet many of the key objectives of the Project, this alternative would give the County the limited flexibility and opportunity to bring cannabis operations into compliance with the SBCC and the County Comprehensive Plan while minimizing adverse effects to the environment. With implementation of mitigation measures, the Reduced Registrants Alternative provides a balance between meeting Project objectives, including quality of life concerns, and addressing environmental impacts and allowing for limited amounts of growth in the local cannabis industry. However, implementation of Alternative 3, due to its restrictions on development and limitations to eligible areas for cannabis activities, could introduce barriers to participation in the Project and increase unlicensed, unmonitored actions, which are consistently the more severe and environmentally damaging significant and unavoidable impacts identified by the analysis, as found within the No Project Alternative. Additionally, although restrictions could drive some growers into conducting illegal cultivation operations in areas such as the Los Padres National Forest, places with dense vegetation, or are readily concealed, the existing industry in the County is primarily that of

major agricultural operations (including use of hoop structures and greenhouses). These types of operations are unlikely to relocate to illegal areas or within more rural, removed areas. Instead, it is anticipated that these operations which cannot obtain licensing are more likely to relocate outside of the County to areas with different or reduced regulatory oversight, such as the counties of Mendocino, Calaveras, Monterey, or Humboldt.

Given that unregulated cannabis activities currently exist and are likely to continue to exist within the County, secondary impacts, with the exception of aesthetics and visual resources, are considered to result in significant and unavoidable effects on the human and natural environment due to the difficulty of effectively enforcing and regulating such unlicensed operations. Due to the potential for operators to continue to engage in such activities within the County and be precluded from the licensing program, either due to costs of licensing, associated costs of development, or other reasons, significant and unavoidable impacts are considered to continue to occur, regardless of the Project scenario.

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
Aesthetics and Visual Resources		
Impact AV-1. Cannabis cultivation could adversely affect scenic resources and vistas, existing visual character, and lighting and glare.	MM AV-1. Screening Requirements	Less than significant with mitigation (Class II)
Impact AV-2. Cannabis manufacturing, testing, retail, and distribution could adversely affect scenic resources and vistas, existing visual character, and lighting and glare.	None required	Less than significant (Class III)
Impact AV-1. Cannabis cultivation could adversely affect scenic resources and vistas, existing visual character, and lighting and glare.	MM AV-1. Screening Requirements	Less than significant with mitigation (Class II)
Agricultural Resources		
Impact AG-1. Proposed land uses under the proposed Project are potentially incompatible with existing zoning for agricultural uses and Williamson Act contracts.	MM AG-1. Cannabis Cultivation Prerequisite to Ancillary Use Licenses	Less than significant with mitigation (Class II)
Impact AG-2. Cumulative cannabis-related development would potentially result in the loss of prime agricultural soils. However, the Project would not result in conversion to non-agricultural use or impair agricultural land productivity (whether prime or non-prime).	MM AG-2. New Structure Avoidance of Prime Soils	Significant and unavoidable (Class I)
Cumulative Impacts	None required	Significant and unavoidable (Class I)
Air Quality and Greenhouse Gas Emissions		
Impact AQ-1. Cannabis activities under the Project could be potentially inconsistent with the Clean Air Plan and County Land Use Element Air Quality Supplement.	No mitigation feasible	Significant and unavoidable (Class I)
Impact AQ-2. Construction-generated emissions from cannabis activities under the Project could potentially violate an air quality standard or substantially contribute to an air quality violation, and result in a cumulatively considerable net increase of a criteria pollutant for which the County is in nonattainment.	No mitigation required	Less than significant (Class III)
Impact AQ-3. Emissions from operations of cannabis activities could potentially violate an air quality standard or substantially contribute to an air quality violation, and result in a cumulatively considerable net	MM AQ-3: Cannabis Site Transportation Demand Management	Significant and unavoidable (Class I)

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
increase of a criteria pollutant for which the County is in nonattainment.		
Impact AQ-4. Cannabis activities under the Project could be potentially inconsistent with the Energy and Climate Action Plan.	MM UE-2a. Energy Conservation Best Management Practices MM UE-2b. Participation in a Renewable Energy Choice Program MM UE-2c. Plan Review by the County Green Building Committee	Significant and unavoidable (Class I)
Impact AQ-5. Cannabis activities under the Project could potentially expose sensitive receptors to objectionable odors affecting a substantial number of people.	MM AQ-5. Odor Abatement Plan	Significant and unavoidable (Class I)
Cumulative Impacts	No mitigation required	Significant and unavoidable (Class I)
Biological Resources		
Impact BIO-1. Cannabis activities could have adverse effects on unique, rare, threatened, or endangered plant or wildlife species.	MM BIO-1a. Tree Protection Plan MM BIO-1b. Habitat Protection Plan MM HWR-1a. Cannabis Waste Discharge Requirements Draft General Order (see Section 3.8, <i>Hydrology and Water Resources</i>)	Less than significant with mitigation (Class II)
Impact BIO-2. Cannabis activities could have adverse effects on habitats or sensitive natural communities.	MM BIO-1a. Tree Protection Plan MM BIO-1b. Habitat Protection Plan	Less than significant with mitigation (Class II)
Impact BIO-3. Cannabis activities could have adverse effects on the movement or patterns of any native resident or migratory species.	MM BIO-1b. Habitat Protection Plan MM BIO-3. Wildlife Movement Plan	Less than significant with mitigation (Class II)
Impact BIO-4. Cannabis activities may conflict with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources.	MM BIO-1a. Tree Protection Plan MM BIO-1b. Habitat Protection Plan	Less than significant with mitigation (Class II)
Cumulative Impacts	Mitigations above are required	Less than significant with mitigation (Class II)

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
Cultural Resources		
Impact CR-1. Cannabis activities that occur in or near previously unevaluated historic properties could potentially cause physical demolition, destruction, relocation, or alteration of historical resources.	MM CR-1 (County Standard Mitigation Measure [CSMM] CulRes-10). Preservation	Less than significant with mitigation (Class II)
Impact CR-2. Cannabis activities could potentially cause disruption, alteration, destruction, or adverse effects on significant archaeological resources, tribal cultural resources, human remains, or paleontological resources.	MM CR-2. Archaeological and Paleontological Surveys	Less than significant with mitigation (Class II)
Cumulative Impacts	No mitigation required	Less than significant (Class III)
Geology and Soils		
Impact GEO-1. Cannabis cultivation under the Project could have adverse effects due to exposure to unstable earth conditions, such as landslides, erosion, earthquakes, liquefaction, expansive soils, ground failure, or other geologic hazards.	None required	Less than significant (Class III)
Impact GEO-2. Cannabis product manufacturing, testing, retail, and distribution could have adverse effects due to exposure to unstable earth conditions such as landslides, erosion, earthquakes, liquefaction, expansive soils, ground failure, or other geologic hazards.	None required	Less than significant (Class III)
Cumulative Impacts	None required	Less than significant (Class III)
Hazards and Hazardous Materials		
Impact HAZ-1. Potential adverse impacts could result from prior use, storage, or discharge of hazardous materials on lands subject to future cannabis activities.	No mitigation required	Less than significant (Class III)
Impact HAZ-2. Potential adverse impacts could result from former oil or gas pipelines or well facilities on lands subject to cannabis activities.	No mitigation required	Less than significant (Class III)
Impact HAZ-3. Potential adverse impacts could result from use, storage, or distribution of hazardous or toxic materials for cannabis activities.	MM HAZ-3. <i>Volatile Manufacturing Employee Training Plan</i>	Less than significant with mitigation (Class II)
Impact HAZ-4. Potential adverse impacts could result from cannabis activities that may be located within high fire hazard areas, exposing people or structures to significant risks involving wildland fires.	No mitigation required	Less than significant (Class III)
Cumulative Impacts	No mitigation required	Less than significant (Class III)

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
Hydrology and Water Quality Impacts		
Impact HWR-1. Cannabis cultivation could potentially have adverse effects on surface water quality.	MM HWR-1. Cannabis Waste Discharge Requirements General Order MM BIO-1b. Habitat Protection Plan	Less than significant with mitigation (Class II)
Impact HWR-2. Cannabis cultivation could potentially have adverse effects on groundwater quality.	MM HWR-1. Cannabis Waste Discharge Requirements General Order	Less than significant with mitigation (Class II)
Impact HWR-3. Cannabis cultivation could have adverse effects on groundwater supplies and groundwater recharge.	Recommended MM HWR-3. Water Conservation–Water Efficiency for Cannabis Activities	Less than Significant (Class III)
Impact HWR-4. Cannabis cultivation could potentially have adverse effects on existing drainage patterns.	No mitigation required	Less than Significant (Class III)
Impact HWR-5. Cannabis testing, manufacturing, distributing, and retail could have adverse effects on surface and groundwater quality, groundwater supplies, and groundwater recharge.	Recommended MM HWR-3. Water Conservation–Water Efficiency for Cannabis Activities	Less than Significant (Class III)
Impact HWR-6. Cannabis testing, manufacturing, distributing, and retail could have adverse effects on existing drainage patterns.	No mitigation required	Less than Significant (Class III)
Cumulative Impacts	No mitigation required	Less than significant (Class III)
Land Use Impacts		
Impact LU-1. Cannabis cultivation, manufacturing, testing, distribution, and retail would potentially conflict with an applicable land use plan, policy, or regulation.	MM LU-1. Public Lands Restriction	Less than Significant with Mitigation (Class II)
Impact LU-2. Cannabis cultivation, manufacturing, testing, distribution, and retail could result in adverse quality of life effects to existing communities due to increases in traffic, odors, noise, or other physical environmental impacts.	MM AQ-3. Cannabis Site Transportation Demand Management MM AQ-5. Odor Abatement Plan MM TRA-1. Payment of Transportation Impact Fees	Less than Significant with Mitigation (Class II)
Cumulative Impacts	No mitigation required	Less than significant (Class III)
Noise		
Impact NOI-1. Cannabis cultivation, distribution, manufacturing, processing, testing, and retail sales would result in a	No mitigation required	Less than Significant (Class III)

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
short-term increase in noise from construction.		
Impact NOI-2. Cannabis cultivation, distribution, manufacturing, processing, testing, and retail sales facilities would result in long-term increases in noise from traffic on vicinity roadways and from cultivation operations.	MM AQ-3. Cannabis Site Transportation Demand Management	Significant and Unavoidable (Class I)
Cumulative Impacts	No mitigation required	Significant and Unavoidable (Class I)
Public Services		
Impact PS-1. Cannabis cultivation would incrementally increase demand for police, fire, parks, schools, libraries, and other public services.	No mitigation required	Less than Significant (Class III)
Impact PS-2. Cannabis testing, manufacturing, distribution, and retail would incrementally increase demand for police, fire, parks, schools, libraries, and other public services.	No mitigation required	Less than Significant (Class III)
Cumulative Impacts	No mitigation required	Less than Significant (Class III)
Transportation and Traffic		
Impact TRA-1. Cannabis activities may result in increases of traffic and daily vehicle miles of travel that affect the performance of the existing and planned circulation system.	MM AQ-3. Cannabis Site Transportation Demand Management MM TRA-1. Payment of Transportation Impact Fees	Significant and unavoidable (Class I)
Impact TRA-2. Cannabis activity operations may result in adverse changes to the traffic safety environment.	MM AQ-3. Cannabis Site Transportation Demand Management MM TRA-1. Payment of Transportation Impact Fees	Significant and unavoidable (Class I)
Cumulative Impacts	No mitigation required	Significant and unavoidable (Class I)
Utilities and Energy Conservation		
Impact UE-1. Implementation of the Project and operation of licensed commercial cannabis sites throughout the County would result in additional new demand for utility services, supplies, and infrastructure.	No mitigation required	Less than Significant (Class III)
Impact UE-2. The Project may result in increased demand for new energy resources.	MM UE-2a. Energy Conservation Best Management Practices MM UE-2b. Participation in a Renewable Energy Choice Program	Less than Significant with Mitigation (Class II)

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts		
Impact	Mitigation Measure	Residual Significance
	MM UE-2c. Licensing by the County Green Building Committee	
Impact UE-3. The Project would be potentially inconsistent with existing energy standards and conservation policies.	No mitigation required	Less than Significant (Class III)
Cumulative Impacts	No mitigation required	Less than Significant (Class III)
Population, Employment, and Housing		
Impact PEH-1. The Project would potentially induce population growth countywide.	No mitigation required	Less than significant (Class III)
Cumulative Projects	No mitigation required	Less than significant (Class III)