

## Chapter 5

# Other CEQA Considerations

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This section presents the evaluation of additional considerations required by the California Environmental Quality Act (CEQA) that are not covered within the other sections of this Environmental Impact Report (EIR) for the Cannabis Land Use Ordinance and Licensing Program (Project) in the County of Santa Barbara (County). Section 15126 of the State CEQA Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Accordingly, in addition to the analysis provided in Chapter 3, *Environmental Impact Analysis*, this EIR must identify growth-inducing impacts and significant irreversible environmental changes that would potentially result from implementation of the Project. Accordingly, other CEQA considerations include significant unavoidable environmental effects of the Project, significant irreversible environmental changes, growth-inducing impacts (including removal of obstacles to growth), and resource areas that are found not to be significant.

## 5.1 Significant Unavoidable Environmental Effects

CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts that cannot be avoided, even with implementation of feasible mitigation measures. Where there are significant impacts, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Based on the analysis presented in this EIR, implementation of the proposed Project would create significant and unavoidable impacts to agricultural resources, air quality and greenhouse gas (GHG) emissions, noise, and transportation and traffic, and cumulative impacts would be significant and unavoidable for aesthetics and visual resources.

### Agricultural Resources

Cannabis activity structural development under the Project would cumulatively convert prime soils with the incremental development of these ancillary structures on agricultural land in the County, and result in a significant loss of agricultural resources over the life of the Project. Though individual sites may not result in a significant impact under County thresholds, cannabis activity development pursuant to the Project could aggregate to a considerable conversion of prime soils, and represents a *potentially significant* impact, and would require implementation of **MM AG-2, New Structure Avoidance of Prime Soils**, to reduce impacts. However, implementation of the mitigation measure would not ensure that an aggregate loss of prime soils would be avoided from development of ancillary uses to cannabis cultivation; that is, there is no guarantee all prime soils would be avoided, because there are some viable sites that are entirely comprised of prime soils. Therefore, impacts would be *significant and unavoidable* (Class I). See Section 3.2, *Agricultural Resources*, for more detailed information.

## Air Quality And Greenhouse Gas Emissions

The Project anticipates growth in the agricultural economic sector beyond what is forecasted in the Santa Barbara County Association of Governments (SBCAG) Regional Growth Forecast; therefore, implementation of the Project is considered inconsistent with the County's Clean Air Plan (CAP) and Energy and Climate Action Plan (ECAP). Since no feasible mitigation exists which could ensure consistency with anticipated growth projections, consistency with adopted air quality/GHG emissions planning plans and policies, or consistency with basic Project objectives, impacts cannot be avoided and would be *significant and unavoidable* (Class I). Operational emissions would occur due to the increased mobile emissions generated by vehicle trips from employees and customers of new or expanded cannabis activities sites, as well as from the transportation of cannabis products to and from these sites. Operational emissions would also be produced from electrical equipment used in cannabis activities. 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. To help reduce this impact, cannabis-specific transportation demand management measures would ensure carpooling and reduced reliance on vehicles, which would be required on a site-by-site basis. With implementation of **MM AQ-3, Cannabis Site Transportation Demand Management**, potential impacts resulting from air pollutant emissions generated by mobile sources would be reduced; however, as emissions may still exceed thresholds, impacts would be *significant and unavoidable* (Class I). Although the scent of cannabis plants is not necessarily harmful to people, the 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. The Project requires cannabis cultivation sites to be setback by 600 feet from sensitive receptors such as schools, daycare centers, and youth centers. However, the Project does not currently require setbacks for cannabis activities from other known sensitive receptors or land uses, including hospitals, nursing homes, residential land uses, and recreational land uses. Implementation of **MM AQ-5, Odor Abatement Plan (OAP)**, would serve to address many adverse odor nuisances to receptors Countywide, including where cannabis operations may be located adjacent to sensitive receptors and populations which may be more susceptible to odors. However, implementation of the Project would reasonably foreseeably expand cannabis operations and there remains the potential for odors to present a nuisance to neighboring receptors. Given the difficulty in being able to effectively contain or eliminate cannabis odors, and the residual potential for odors to be perceived as a nuisance despite implementation of odor control measures, additional potential mitigation is considered infeasible. Therefore, as no additional feasible mitigation beyond the requirement for an OAP has been identified which could ensure the containment, elimination of generation, or detectability of cannabis odors, residual impacts of the proposed Project would be *significant and unavoidable* (Class I). See Section 3.3, *Air Quality and Greenhouse Gas Emissions*, for more detailed information.

## Noise

With implementation of the Project, future long-term increases in roadway noise and congestion could result in impacts to sensitive receptors. Rural cannabis sites could generate employment traffic using rural roads daily, which may increase ambient noise levels beyond the County's thresholds. Therefore, even though the location and degree of noise effect cannot be accurately determined, Project-related long-term increases in roadway noise from cannabis employee vehicle trips would

result in *potentially significant* impacts. Implementation of **MM AQ-3, Cannabis Site Transportation Demand Management**, would be required to reduce employee trips to and from cannabis sites, especially in rural areas where reduced trips through carpooling and variable work schedules could measurably reduce noise impacts from vehicle noise on relatively quiet roadways. However, since the location and degree of vehicle noise cannot be known as part of the Project, there is no feasible way to ensure that vehicle noise increases from Project traffic would not exceed County thresholds for ambient noise. Therefore, the proposed Project could result in significant long-term noise impacts related to traffic noise from cannabis activity operations and the residual impact would be *significant and unavoidable* (Class I). See Section 3.10, *Noise*, for more detailed information.

## Transportation and Traffic

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 such that impacts would be significant. Implementation of **MM TRA-1, Payment of Transportation Impact Fees**, and **MM AQ-3, Cannabis Site Transportation Demand Management**, would reduce impacts to County transportation facilities. However, given 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) that currently and are projected to operate at or near deficient LOS, the Project may contribute towards an exceedance in LOS or exacerbate existing deficient LOS such that impacts would be significant. Therefore, as these facilities are located outside the jurisdiction of the County and cannot feasibly be controlled or improved through County actions, and the Project would be inconsistent with the growth projections of the Regional Transportation Plan and Sustainable Communities Strategy (RTP-SCS), impacts to these facilities are considered *significant and unavoidable* (Class I). Additionally, implementation of 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, or experience other potentially hazardous conditions. Implementation of **MM TRA-1, Payment of Transportation Impact Fees**, and **MM AQ-3, Cannabis Site Transportation Demand Management**, would reduce safety and emergency access related impacts to County transportation facilities to a less than significant level. However, the Project would generate incompatible traffic, increase roadway hazards, or generate traffic in areas which would be incompatible with existing surrounding land uses (i.e., generation of commercial truck traffic in urban residential areas) along roadways located outside of the County's jurisdiction. Therefore, as these facilities are located outside the jurisdiction of the County and cannot feasibly be controlled or improved through County actions, impacts to these facilities are considered *significant and unavoidable* (Class I). See Section 3.12, *Transportation and Traffic*, for more detailed information.

The reasons why the Project is being proposed, notwithstanding the significant impacts, are set forth in the Project objectives stated in Section 2.3.2, *Project Objectives*. As indicated, the proposed Project would enable the County to manage and monitor cannabis activities and operations in the unincorporated areas of the County in a manner consistent with state law, and is intended to balance the demands for cannabis and cannabis products with the health, safety, and welfare of the community and the environment.

## 5.2 Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(c) requires a discussion of “*significant irreversible environmental changes which would be caused by the proposed project should it be implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*”

Analysis of environmental impacts of the proposed Project considers effects on the environment from future cannabis activities anticipated under the Project. Construction and operation of cannabis facilities in the County would entail the commitment of non-renewable energy resources; human resources; and resources such as sand and gravel, asphalt, steel, copper, lead, other metals, and water resources, most of which are non-renewable or locally limited resources. Resources that would be permanently and continually consumed during the life of the Project include water, electricity, and fossil fuels, as well as landfill space; however, the amount and rate of consumption of these resources would not result in the inefficient or wasteful use of resources, as further described in Section 3.13, *Utilities and Energy Conservation*. Compliance with all applicable building codes and County and state regulations, as well as proposed Project mitigation measures, would ensure that natural resources are conserved to the maximum extent feasible. Additionally, it is possible that new technologies or systems will emerge in the future, or ~~will~~ become more cost-effective or user-friendly, to further reduce the reliance on nonrenewable natural resources. While future construction activities and operational activities anticipated to occur under the Project would result in the irretrievable commitment of non-renewable energy resources (primarily in the form of fossil fuels, including fuel oil, natural gas, and gasoline for automobiles and construction equipment), consumption of such resources is associated with any development in the region, and is not unique or unusual to the proposed Project.

The Project would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment. While cannabis activities would result in the limited use, transport, storage, and disposal of hazardous materials, all activities would comply with applicable state and federal laws related to hazardous materials transport, use, and storage, which would significantly reduce the likelihood and severity of accidents that could result in irreversible environmental damage. See Section 3.7, *Hazards and Hazardous Materials*, for more detailed information. Therefore, the Project’s irreversible environmental changes would be *less than significant* (Class III).

## 5.3 Growth-Inducing Impact Analysis

Section 15126.2(d) of the CEQA Guidelines requires consideration of a project’s potential to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. This potential economic or population growth is known as the project’s growth-inducing impact and is distinguished from the direct economic, population, or housing growth of a project because it is an indirect result of implementation of a project that would not have taken place in the absence of the project and that exceeds planned growth. Growth

inducement can be a result of new development that increases employment levels, removes barriers to development, or provides resources that lead to secondary growth. Some projects may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Induced growth in any area should not be assumed to be necessarily beneficial, detrimental, or of little significance to the environment. It should, however, be analyzed for an understanding of how it could potentially affect the surrounding environment.

The proposed Project could result in three types of growth-inducing impacts: 1) the creation of short- and long-term employment opportunities which draw newcomers to the region; 2) the associated increase in housing demand; and 3) expansion of utilities and infrastructure.

As discussed in Section 3.14, *Population, Employment, and Housing*, the Project would potentially generate an estimated net new 3,615 cannabis-related jobs in the County after implementation of the Project. It is assumed that a large portion of full-time jobs would be absorbed by employees transitioning to cannabis-related activities from other jobs in the agricultural, manufacturing, and retail economic sectors of the County. However, there would be an incremental increase of new workers that would commute to cannabis activities sites and potentially relocate to urban areas in the vicinity of these sites as a result of implementation of the Project. Secondary effects attributed to backfill of new employees' current jobs could also result in a slight increase in employment generation. Further, as a result of a potential influx of new employees, related impacts would likely occur due to increased commuter traffic and associated air quality impacts, particularly generation of GHGs and ozone precursors.

While the Project does not include any new residential development, the commercial nature of cannabis activities as well as the potential new cannabis-related jobs could generate an appeal for people to move to and permanently reside in the County. As discussed in Section 3.14, *Population, Employment, and Housing*, this increase in employment due to the Project would have a potential commensurate increase in demand for housing within the County, which in turn would contribute to an increase in the County's population. However, a portion of these new jobs would potentially be absorbed by existing residents of the County and adjacent counties, who are currently unemployed or who change jobs to enter the cannabis industry. The projected increase of employment would not exceed existing adopted projections, and subsequently would not create additional demand for housing units beyond projected levels of demand addressed in the 2015 Housing Element Update. However, demand for farmworker and low-income housing would particularly increase due to the anticipated wages of cannabis employees and associated household income, assuming the cannabis employee is the only wage earner of the household.

As discussed in Section 3.14, *Population, Employment, and Housing*, the expected increase in employment, housing, and population associated with cannabis-related activities in the County would be below regional and local growth forecasts for the County as a whole. In relation to County and SBCAG's growth forecast for 247,757 employees and 183,600 housing units by 2040, growth resulting from Project implementation would fall within 2040 projections. The Project is expected to result in an additional 3,615 jobs, representing a 6.5-percent increase in employment throughout the whole County. Demand for housing ~~is expected to~~ would potentially increase as a result of 3,615 new employees in the cannabis industry. The projected demand for 3,615 new housing units, assuming each new employee would require a home, would constitute a 11-percent increase in the County's existing housing stock; however, this demand represents a worst-case scenario as workers associated with the cannabis industry usually include a high level of younger, less established employees who do not have families and are more willing to live in roommate or other non-traditional housing situations.

Based on the number of people per household (2.9), the potential 3,615 new residential units would directly support 10,484 residents, an 11-percent increase in the population of the whole County. Project implementation would result in a total Countywide population of approximately 434,284 individuals, which would be below 2040 projections by nearly 85,680 individuals. As previously described, this estimate is a worst-case scenario and would not exceed 2025 projects, when estimated buildout of the Project may have been achieved. As discussed in Section 3.14, *Population, Employment, and Housing*, while the Project would increase County employment, demand for housing, and total population by a rate that would be met by existing local and regional projections, any increase in the amount of jobs relative to the agricultural and manufacturing economic sectors within the County would be substantial, representing more than a 1-percent increase, which would be inconsistent with regional growth forecasts.

The Project could also result in development of new utility infrastructure, including potentially new wells and other water supply sources and energy infrastructure, to support cannabis activities in rural and/or underserved areas of the County, such as on AG-II parcels. New cannabis activities sites in rural areas may also be required to improve access roadways in areas which are currently not compliant with fire safety development standards. These improvements in rural areas could introduce access to currently inaccessible and/or unbuildable areas of the County and, in doing so, remove physical barriers to development in these areas and facilitate improved access and circulation within the vicinity, thereby contributing to growth-inducing effects. New development in these areas of the County could have adverse impacts related to erosion, water quality and supply, and biological resources. However, based on the June 2017 Non-Personal Cannabis Cultivation and Related Operations Registry Program (2017 Cannabis Registry), it is anticipated that most cannabis activities would occur in already developed greenhouses and accessible land. Further, existing County building and development regulations would ensure that any new development that does occur in rural areas adheres to County standards through the permitting process.

Ultimately, there is potential for a significant amount of induced development and population growth within the County due to implementation of the Project. It is anticipated that development standards under the proposed Project and Land Use and Development Code (LUDC), as well as permitting processes for potential licensees would address land use conflicts and neighborhood compatibility issues on a site-by-site basis before cannabis license issuance. Further, the Project does not include any changes to existing land use and zoning designations of land that are set forth in the County Comprehensive Plan and would not result in any increase in capacity for new development in the County through upzoning or lot splits. Additionally, development would incrementally increase in rural areas as individual property owners realize development potential, resulting in gradual growth-inducing impacts that would not create immediate significant expansion and demand in these areas. However, the Project's likely increase in the agricultural and manufacturing economic sectors, for which SBCAG has projected regional declines, would exceed current adopted projections. Therefore, while the Project would be inconsistent with SBCAG 2013 anticipated declines in regional agricultural and manufacturing economic sectors, the Project's growth-inducing impacts would be wholly in conformance with the County Comprehensive Plan and entirely within the County's adopted population, employment, and housing projections, as further discussed in Section 3.14, *Population, Employment, and Housing*. Therefore, though anticipated increases in County employment would result in some increases in public services and utilities demands, growth-inducing impacts would be less than significant with implementation of the Project.

## 5.4 Secondary Impacts

Secondary impacts of the Project include the effects of additional or expanded unregulated or unlicensed cannabis activities in the County that may be discouraged from becoming licensed by Project standards, required taxes, or other factors. Secondary impacts exclude unregulated cannabis activity that is already occurring and therefore is accounted for in the environmental baseline. Identifying such secondary impacts of future additional or expanded unlicensed cannabis activity as associated with implementation of the Project is a conservative programmatic approach. Secondary impacts of these illegal cannabis activities are contingent on the amount of licensing/permitting that would occur; however, the location and extent of existing or future cannabis activities sites that do not get licensed/permited is impossible to know. These illegal activities would not necessarily adhere to existing County regulations and/or mitigation measures in this EIR and, therefore, could cause adverse impacts due to practices such as not following grading regulations 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 GHG emissions. Secondary impacts would vary by resource area, ranging from minor to severe, as discussed below.

### Aesthetics and Visual Resources

Project implementation could create secondary impacts to aesthetics and visual resources through additional or expanded unlicensed cannabis activities countywide. Such illegal cannabis activities would likely not comply with aesthetic design criteria and guidelines to protect scenic resources. However, unlicensed cultivation activities sites are usually screened from public view to avoid exposing illegal operations. Therefore, these sites are not expected to have a substantial effect on scenic resources or visual character because they would tend to be hidden from public view and not be easily detectable to avoid enforcement by the County and other agencies. The location of future expanded or additional unlicensed cannabis activities sites cannot be predicted with any certainty; such activities could occur in any of the areas of the County and could expand into any hidden areas suitable for cultivation. Given its unregulated nature and the need to conceal operations, such activities are anticipated to occur in heavily screened areas and more remote rural areas. Vegetation clearing, grading, and building support facilities may not substantially change the existing character of the surrounding landscape because of the need for concealment. These unregulated cannabis activities would be difficult to detect and therefore would not noticeably degrade scenic resources in publicly visible areas.

### Agricultural Resources

Project implementation could create secondary impacts to agricultural resources through additional or expanded unlicensed cannabis activities countywide. Such illegal cannabis activities would likely occur without adherence to existing restrictions for agricultural practices, setbacks, County Building Code compliance, or protection of Farmland Monitoring and Mapping Program (FMMP) farmland. Operational impacts associated with soil tilling, watering, weed control, and other activities may affect soil quality and cause damage to surrounding agricultural operations from potential drainage runoff. Unregulated cannabis activities may also result in the degradation of soils identified as important farmland or for commercial agricultural usage.

## **Air Quality and Greenhouse Gas Emissions**

Project implementation could create secondary impacts to air quality and GHG emissions through additional or expanded unlicensed cannabis activities countywide. Such illegal cannabis activities would likely not comply with County regulations related to construction-generated fugitive dust and diesel particulate matter emissions, or Project requirements related to operation-related emissions such as the restriction of generators. Potential sources of air pollution, GHGs, and objectionable odors from unregulated sites include the use of diesel or gasoline generators, not using odor control measures on indoor cultivation or manufacturing operations, and not observing setbacks so that the odor associated with cannabis, especially during the flowering phase, would disturb nearby sensitive receptors. Unregulated cannabis activities would also continue to contribute to increased nitrogen oxide (NO<sub>x</sub>) emissions due to vehicle travel to and from sites if they expand or establish new sites.

## **Biological Resources**

Project implementation could create secondary impacts to biological resources through additional or expanded unlicensed cannabis activities countywide. Impacts would be caused by clear-cutting of sensitive habitats, destruction of habitat, introduction of hazardous materials, introduction of barriers such as security fencing to movements of resident or migratory species, unpermitted stream diversions, and other damaging activities required to support unregulated cannabis activities.

## **Cultural Resources**

Project implementation could create secondary impacts to cultural resources through additional or expanded unlicensed cannabis activities countywide. Due to the secretive nature of these unregulated sites, such illegal cannabis activities would be unlikely to follow the appropriate state and County guidelines and regulations pertaining to cultural resources. Therefore, these sites could potentially have an adverse effect on archaeological resources, tribal cultural resources, human remains, and paleontological resources from unpermitted ground disturbance. Since most built historical resources in the County are located in populated urban areas, the potential for unregulated cannabis activity going unnoticed within historical properties is unlikely. However, there is still a potential for unregulated cannabis activities to have an adverse effect on built historic resources, especially within structures that are eligible historic resources but are not listed on a local, state, or federal resource list.

## **Geology and Soils**

Project implementation could create secondary impacts to geology and soils through additional or expanded unlicensed cannabis activities countywide. Due to the secretive nature of these unregulated sites, such illegal cannabis activities would be unlikely to follow the appropriate County guidelines and regulations pertaining to siting, building, grading, and erosion control. Therefore, these sites could potentially have an adverse effect on persons and structures from exposure to unstable earth conditions, including uncontrolled grading with associated soil disturbance and runoff.

## **Hazards and Hazardous Materials**

Project implementation could create secondary impacts related to hazards and hazardous materials through additional or expanded unlicensed cannabis activities countywide. Impacts would be related to misuse of hazardous materials, including pesticides, rodenticides, diesel fuel, and butane, as well

as the potential for activities that increase fire hazards, including use of machinery, electric power, and increased human presence onsite. Use of flammable or explosive materials in fire sensitive regions could create increased fire hazards and risk to nearby land uses and residents. Potentially hazardous manufacturing activities such as production of butane honey oil (BHO) through open loop extraction processes have potential to cause explosions. These illegal cannabis activities sites may be concentrated in remote areas where adequate emergency response services or evacuation plans may not be available, or in more densely populated residential settings, in which threat from fire or explosive hazards may increase demand for emergency response services. As such, these sites may continue to pose increased risk to workers and residents of these sites in the event an emergency may occur. Given that these illegal operations would not be regulated, there is a greater chance that these sites may not comply with policies or regulations designed to reduce fire hazards, and may pose risk to fire hazards from poor maintenance or management of electrical equipment, improper use and storage of volatile or combustible materials used in cannabis extraction processes, burning of cannabis waste products, site clearing activities, or hazardous operation of generators. In addition, such unregulated facilities could operate in close proximity to sensitive receptors, such as within neighborhoods or near schools, with potential for exposure of sensitive populations to hazards or hazardous materials. Unlicensed/unpermitted cannabis activities cannot be ensured to comply with existing safety-related policies and regulations.

## Hydrology and Water Resources

Project implementation could create secondary impacts to hydrology and water quality through additional or expanded unlicensed cannabis activities countywide. Such illegal cannabis activities would likely not follow existing regulations intended to protect water quality, nor would these sites go through a licensing/permitting process to ensure water quality is considered in site development. Impacts could occur related to inappropriate siting, grading, use of pesticides, runoff control, water source control, and erosion control. Although these sites may rely on existing and new wells, it is more likely that unlicensed sites would rely on illegal stream diversions due to the lower expense of operating a portable pump compared to drilling a new well. These sites could potentially have adverse impacts on water resources or be sited in areas of inundation or mudflows.

## Land Use and Planning

Project implementation could create secondary impacts related to land use and planning through additional or expanded unlicensed cannabis activities countywide. Such illegal cannabis activities would likely not adhere to County land use plans, policies, or regulations that are intended to protect or enhance environmental resources, and impacts to neighborhood compatibility and plan inconsistency could result from land use conflicts related to unregulated cannabis activities occurring within existing communities.

## Noise

Project implementation could create secondary noise impacts through additional or expanded unlicensed cannabis activities countywide. Such illegal cannabis activities would likely not conform to the County's noise thresholds and regulatory standards, or the Project's general requirements for the shielding or control of noise so as to avoid exposure of incompatible noise to nearby sensitive receptors. Construction of these unregulated sites would result in short-term increases in noise, which could adversely affect sensitive receptors if located in the vicinity. Cannabis activities by their nature do not generate high levels of noise; however, new vehicle traffic on County roadways may

result in long-term noise increases. Noise could also be generated by farm equipment on outdoor cultivation activities sites and possible truck traffic during peak harvest activities. Greenhouse, indoor, manufacturing, processing, testing, and retail sales sites would likely not have perceptible sources of noise beyond the building or property line. Given its unregulated nature and the need to conceal operations, such illegal cannabis activities, especially those that would result in substantial noise levels, are anticipated to occur in remote rural areas, out of the noise range of any sensitive receptors. Therefore, these clandestine sites are not expected to have a substantial effect on noise because they would tend to be out of public earshot and not be easily detectable to avoid enforcement by the County and other agencies. As the location of future expanded or additional unlicensed cannabis activities sites cannot be predicted with any certainty, such activities could occur in any of the areas of the County and could expand into any hidden areas suitable for these activities.

## **Public Services**

Project implementation could create secondary impacts to public services through additional or expanded unlicensed cannabis activities countywide. Since the location of these unregulated sites cannot be predicted with any certainty, such illegal cannabis activities could continue or expand in areas unsuitable for cannabis activities relative to fire and police response times or in proximity to sensitive public services. Cannabis manufacturing activities, including volatile extraction processes, may occur in structures that are not in compliance with the County Building Code, thereby increasing fire and hazards risks for both residents and emergency response personnel. Unlicensed cannabis activities may occur in remote areas lacking adequate emergency access routes, further increasing response times.

## **Transportation and Traffic**

Project implementation could create secondary impacts to transportation and traffic through additional or expanded unlicensed cannabis activities countywide. Such illegal cannabis activities would continue, relocate, or expand, and generate increased traffic with potential effects on the performance of the circulation system. Secondary impacts could also result from traffic hazards; while small-scale unlicensed cannabis activities may be located within developed areas of the County and introduce little potential for increased traffic hazards, or may be located within areas with adequate emergency access, larger unlicensed cannabis activities may tend to be located within remote areas of the County along unmaintained roadways. These unregulated cannabis activities generate traffic from employees, and sites that use private undeveloped roads or access rural roads within the County may introduce or exacerbate traffic safety hazards and conflict with users of the same roadways.

## **Utilities and Energy Conservation**

Project implementation could create secondary impacts to utilities and energy conservation through additional or expanded unlicensed cannabis activities countywide. Such illegal cannabis activities would likely not comply with County regulations, and could include unregulated groundwater or surface water diversion, improper disposal and treatment of wastewater generated onsite, improper storage, handling, and disposal of municipal solid waste and cannabis plant waste products, as well as the inefficient and negligent use of energy resources.

## Population, Employment, and Housing

Project implementation could create secondary impacts to population, employment, and housing through additional or expanded unlicensed cannabis activities countywide. Secondary impacts may include additional employees seeking housing within the County, as well as unpermitted residential development to house employees. As the location of unlicensed cannabis activities sites cannot be predicted, these illegal sites could occur in any of the countywide regions and could expand in areas unsuitable for cannabis activities or development of appropriately permitted housing. Given that these activities are illegal and must be concealed from law enforcement, such activities may occur in remote or rural areas without access to necessary public services. Furthermore, unpermitted residential habitation onsite would not be subject to plan check and inspection and would potentially have adverse effects on existing residents and neighborhoods due to unsafe and unpermitted nearby construction.

## 5.5 Effects Not Found to be Significant

CEQA Guidelines Section 15128 requires a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and, therefore, were not discussed in detail in the EIR. For this EIR, issues related to mineral resources were found not to be significant as discussed below.

### Mineral Resources

The proposed Project would not have the potential for significant impacts associated with mineral resources. As described in Chapter 2, *Project Description*, the Project would allow cannabis activities on AG-I, AG-II, C-1, C-2, C-3, CS, SC, M-RP, M-1, M-2 land use and development zones. These zones also allow mining activities, but both cannabis and mining activities would be subject to their respective permit requirements for these land use and development zones in the County. In addition, the majority of mineral resource sites in the County, particularly sand and gravel operations, coincide with areas designated for open space. Since cannabis activities under the Project would not occur on areas of the County zoned for open space, there would be no overlap with potential mineral resources in these areas. The County's LUDC Section 35.82.160, *Reclamation and Surface Mining Permits*, provides regulations for surface mining operations in the County, in compliance with the California Surface Mining and Reclamation Act (SMARA). These existing regulations and standards would ensure that cannabis activities do not adversely affect mineral resources in the County. Therefore, the Project would have no impact related to mineral resources.

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