# Chapter 4

## Alternatives Analysis

### 4.1 Introduction

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or lessen any significant environmental impacts while attaining the basic objectives of the project. This chapter describes three potential alternatives to the Commercial Cannabis Cultivation and Manufacturing Regulation and Licensing Program (Program), analyzes potential environmental impacts resulting from the alternatives, and compares the degree of impact relative to the Program. From this analysis, this section also identifies the Environmentally Preferred Alternative, consistent with CEQA. The purpose of this section is to provide sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Program to inform the County's policy and decision-making process.

Key provisions of the state CEQA Guidelines (Section 15126.6) pertaining to the alternatives analysis are summarized below.

- The discussion of alternatives will focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the project objectives or would be more costly.
- The “No Project Alternative” will be evaluated, along with its impacts. The No Project Alternative analysis will discuss the existing conditions at the time the Notice of Preparation (NOP) was published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a “rule of reason”; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. Alternatives will be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

Alternatives to the Program were identified, screened, and either retained for further analysis or discarded, as described below. Alternatives were developed based on: information provided by the County; input received from comments on the NOP; feedback from the local cannabis industry; and review of other agency cannabis regulations and industry sources. The Alternatives screening process consisted of the following steps:

**Step 1:** Define the alternatives to allow comparative evaluation.
Step 2: Evaluate each alternative using the following criteria:

- The extent to which the alternative would accomplish most of the basic goals and objectives of the Project (see Section 2.3.1, Program Objectives);

- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, General/Local Coastal Plan consistency, and consistency with other applicable plans and regulatory limitations; and

- The extent to which the alternative would avoid or lessen one or more of the significant environmental impacts of the Project.

Step 3: Determine the suitability of the proposed alternative for full analysis in the EIR based on Steps 1 and 2 above. Alternatives considered unsuitable were discarded, with appropriate justification, from further consideration. The state CEQA Guidelines require the consideration of a “no project” alternative and to identify, under specific criteria, an “environmentally superior” alternative. If the environmentally superior alternative is determined to be the “no project” alternative, state CEQA Guidelines §15126.6 requires that the EIR also identify an environmentally superior alternative among the other alternatives.

Feasible alternatives that did not clearly offer the potential to reduce significant environmental impacts and infeasible alternatives were removed from further analysis. In the final phase of the screening analysis, the environmental advantages and disadvantages of the remaining alternatives were weighed with respect to their potential for overall environmental advantage, technical feasibility, and consistency with Program objectives.

At the alternatives screening stage, it is not possible to evaluate potential impacts of the alternatives or the Program with any measure of certainty; however, it is possible to identify elements of the Program that are likely to be sources of impacts. A preliminary assessment of potential significant effects of the Program was also considered in development of alternatives. Additionally, the technical and regulatory feasibility of various potential alternatives was assessed at a general level. Specific feasibility analyses were not needed for this purpose. Any alternative with infeasible characteristics was disregarded. The assessment of feasibility was conducted by using “reverse reason” to identify anything about the alternative that would be infeasible on technical or regulatory grounds. CEQA does not require elimination of a potential alternative based on cost of construction and operation/maintenance. For the Program, characteristics used to eliminate alternatives from further consideration included:

- Limited effectiveness in reducing environmental impacts;
- Feasibility and safety;
- Permitting feasibility;
- Potential adverse effects on resources;
- Potential effects on public health and safety;
- Potential for inconsistency with adopted agency plans and policies; and
- Feasibility when compared to other alternatives under consideration.

The range of feasible alternatives is selected and discussed in a manner that fosters meaningful public participation and informed decision-making.
4.1.1 Alternatives Considered and Discarded

As discussed above, CEQA Section 15126.6(c) requires that an EIR disclose alternatives that were considered and rejected, and provide a brief explanation as to why such alternatives were not fully considered in the EIR. The following alternatives were considered but eliminated from further analysis by the County:

1. **Residential Cannabis (Garage Grow) Alternative** – Would allow commercial cannabis cultivation in single family (R-1) residential zoning district, per the Santa Cruz County Code (SCCC). Demand for this alternative currently exists in the County, as roughly 10 percent (25 applicants) of registrants with known locations are seeking licenses in R-1 zone districts (see Chapter 2, Project Description). There are likely more R-1 registrants that did not disclose a location in the License Registration data. Under this potential alternative, cultivation could occur within R-1 single family residential neighborhoods located throughout 13,230 acres of unincorporated area within the County, in communities such as Live Oak, Aptos, Soquel, Boulder Creek, and Felton. Commercial cannabis cultivation would be licensed within existing attached or detached garages that are constructed consistent with SCCC and County design guidelines and equipped with HVAC equipment. Multiple family zoning districts would not be considered under such an alternative as many such complexes do not have private garages, and use of HVAC units for ventilation, odor control and cooling and utilities within structures with shared walls could raise compatibility issues. To proactively address SCCC compliance, this alternative could build on the current Cottage Industry cultivation category to permit a limited level of residential cultivation (e.g., 500 square feet of canopy per site) while balancing environmental, public service, and quality of life concerns.

This alternative was discarded in that it would not meet key Program objectives. This would include Program Objective No. 4, which states: “Prevent impacts of cannabis cultivation and manufacturing sites on children and sensitive populations.” Interspersing cannabis grows within residential zones would likely expose children, seniors and other sensitive population to cannabis activities and odors. In addition, residential zones typically support many school sites, which even with required setbacks, would incrementally increase exposure of children to cannabis activities. Further, allowing residential “garage grows” could conflict with Program Objective No. 7, which states: “Ensure compatibility of commercial cannabis cultivation and manufacturing sites with surrounding land uses, especially residential neighborhoods, educational facilities…” Even accounting for the well managed nature of some known garage grows, allowing commercial cannabis activities in single family residential neighborhoods could lead to commercial-residential land use conflicts, exposure of children to cannabis activities, increases in odor complaints, and other impacts. In permitting cannabis cultivation proximate to large concentrations of residential units, this potential alternative could incrementally increase impacts related to safety, noise, and air quality beyond those of the Program. Finally, substantial early public comment on the NOP from residents of neighborhoods indicated strong concerns over the potential impacts of allowing grows in such locations. Therefore, this potential alternative was discarded from further consideration.

**No Commercial Cannabis Activities with Enhanced Enforcement Program** – Would ban all commercial cannabis operations Countywide. While SCCC Chapter 7.126 currently includes a ban on medical commercial cannabis cultivation, it also provides immunity from enforcement if a cultivator meets the adopted siting and operation criteria. Under this alternative, no commercial cannabis activities (medical or recreational) would be allowed. In addition, this alternative would
involve an expanded law and code enforcement program to actively terminate unlicensed commercial cannabis operations. This alternative was discarded as it would not meet many of the key objectives of the Program. This would include Program Objective No. 2 which states: “Develop a program that encourages cannabis cultivators and cannabis product manufacturers to operate legally and secure necessary permits and licenses to operate in full compliance with County regulations, maximizing the proportion of activities within the program and minimizing unlicensed activities.” An outright ban on all commercial cannabis activities would directly conflict with this key objective through the creation of a prohibition on all cannabis operations. As a likely result of implementation of this alternative, it is reasonable to assume that many existing commercial cannabis operations would relocate and continue to seek to operate as unlicensed operations prior to be enforced upon by the County, thereby resulting in a potential increase in the number of unlicensed activities within the County with related and exacerbated adverse environmental impacts, such as illegal grading and land clearing, traffic, use of hazardous materials, and unchecked demand for utilities and public services (i.e., fire protection and law enforcement services). Further, prohibiting cannabis could conflict with Program Objective No. 5 and 7, which are focused on the establishment of a regulatory program that would produce and meet current market demands for cannabis and improve the County’s tax base. Under this alternative, unlicensed cannabis businesses may continue to meet some demand for cannabis products locally, but the County would see no fiscal benefit while carrying the burden of related environmental impacts. Further, demand of cannabis in the County would be met by supply outside of the County, which could exacerbate impacts related to traffic generation and circulation, air quality, and greenhouse gases, as well as public health and welfare. Therefore, this potential alternative was discarded from further consideration.

4.2 Alternatives Considered and Analyzed in this EIR

During the preparation of this EIR, the County considered several alternatives for the Program. The goal for developing possible alternative scenarios under CEQA is to identify other means to attain the Program objectives (Section 2.3.1) while lessening or avoiding potentially significant environmental impacts caused by adopting the Program. A reasonable range of alternatives with the potential to attain the basic objectives of the Project but avoid or substantially lessen significant impacts is analyzed below. Each alternative is discussed in relation to the objectives of the Program. In addition to the More Permissive Alternative addressed at a coequal level of detail in the main analysis in Section 3.0 of this EIR, alternatives selected for analysis include:

- No Project Alternative
- Alternative 1 — Most Restrictive Alternative
- Alternative 2 — Most Permissive Alternative

A description of environmental impacts under each alternative is also provided below. Table 4-3 provides a summary of the comparative impacts of each alternative to the Program.

4.2.1 No Project Alternative

In accordance with CEQA, the EIR includes a No Project Alternative. As the Program is long-term regulation of commercial cannabis activities, the No Project Alternative does not mean "no future growth or land uses," but rather that permitted development under existing adopted plans and
policies would occur as if no changes were made. As stated in CEQA Guidelines Section 15126.6(e)(3)(A), "typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan." The No Project Alternative considers environmental impacts if the proposed Program is not adopted and the goals, standards, policies, and actions of the Program are not implemented.

The No Project Alternative would assume that the Program is not adopted and licensed cannabis cultivation and manufacturing would not occur. The County would continue with the existing SCCC Chapters 7.126 and 7.128, which govern medical cannabis cultivation and licensing on an interim basis. The 2014 version of Chapter 7.126 prohibits medical cannabis cultivation business, but grants limited immunity for businesses that comply with this Chapter’s regulations. SCCC Chapter 7.128 created an interim licensing program, but the program is not enforceable, does not have a clear expiration date, and would remain in effect until a Board of Supervisors action to repeal Chapter 7.128 or adopt a permanent program. No regulations would apply to cannabis product manufacturing as the County currently does not have preexisting SCCC sections addressing manufacturing.

The No Project Alternative would involve a continued ban on cannabis cultivation without an active enforcement program.¹ As described in Chapter 2, Project Description, the County Sheriff’s Office currently maintains a complaint-driven enforcement approach to cannabis and does not actively seek out unlicensed cannabis operations; this approach would continue under the No Project Alternative. State agencies, including the California Department of Fish and Wildlife (CDFW) and the Central Coast Regional Water Quality Control Board (RWQCB) would provide some limited additional enforcement services focused on resource protection in the County under pending state programs to support licensed cannabis activities statewide. This alternative would also assume that the interim licensing program defined under Section 7.128 would be nullified and unenforceable.

Despite passage of regulations for cannabis and formation of a licensing program at the state-level, operators would be unable to obtain licensing from the state that would allow for the engagement in cannabis activities within the County, as proposed state regulations will require a local license from the jurisdiction in which they seek to operate as a prerequisite to state licensing. As such, the No Project Alternative would result in the inability for prospective licensees to operate within the County due to the lack of a local licensing program under this alternative. Therefore, this alternative would assume that existing unregulated cultivation and manufacturing activities would continue to operate and potentially expand under the No Project Alternative and would be subject to existing County enforcement, which is primarily based in response to complaints/calls for service, as well as pending state-level regulations and enforcement programs. However, over the more than three decades of strong law enforcement activities, such as the California Attorney General’s Campaign Against Marijuana Planting (CAMP), have not eradicated cannabis cultivation and related activities. Even with strong local state and federal participation in cannabis law enforcement, the illicit cultivation of cannabis in California continues to be a major business.² Therefore, successful implementation of cannabis prohibition may not be realistic, with potential impacts of continued unregulated cultivation discussed below.

¹ As of 2015, the County Sheriff’s Office currently investigates and enforces cannabis cultivation cases only in response to complaints.
² CAMP program partners local, state, and federal agencies to eradicate the large scale illegal cannabis cultivations from public and private lands – California Attorney General 2017 - https://oag.ca.gov/bi/camp
Per CEQA Guidelines Section 15126.6(e)(2), the No Project analysis includes discussion of existing conditions at the time the NOP is published (February 9, 2017 for the Program). The analysis of the impacts of the No Project Alternative would be compared to those of the proposed Project and the More Permissive Project.

Potential Impacts to Resource Areas

Under the No Project Alternative, regulations for commercial cannabis operations would not be adopted and licenses would not be issued in the County, thereby preventing local cannabis business from attaining state-level licenses. As described in Chapter 2, Project Description and Chapter 3, Environmental Impact Analysis, unregulated cannabis activities have potentially significant environmental impacts, particularly related to grading, land clearing, habitat, water resources, odor, traffic, hazards (fire and explosions), air pollution, and utilities, such as energy and water. Under the No Project, unregulated cannabis activates would continue and expand with commensurate impacts to the environment and would not necessarily comply with the County’s General Plan, the SCCC, or any mitigation measures identified for the Program. Continued and increased impacts to environmental resources could include sensitive habitat degradation, cultural resource disturbances, erosion and sedimentation, and ground and surface water quality issues, given the dynamic nature of intensity, variability, and location of cannabis-related uses. Service demands, including water, wastewater, fire and police, solid waste, and utilities, would also increase. Continuing unlicensed cannabis activities would be expected to exacerbate land use compatibility and quality of life issues, as well as related code compliance enforcement issues. Impacts to specific resources are discussed further herein.

Aesthetics and Visual Resources

Under the No Project Alternative, no licensed cannabis activities would occur, and unregulated cannabis operations would continue to adversely affect aesthetic resources in new locations and in new ways Countywide. Impacts related to an increased amount of unregulated cannabis sites may be comparable to the Program given unlicensed cannabis development is typically located in more obscure settings to avoid detection and enforcement. Further, unregulated cannabis activities would remain subject to existing County enforcement in response to complaints and calls for service, as well as state-level enforcement programs, which may reduce adverse effects over time. Although cannabis-related activities within permitted structures may occur, unlicensed activities may also continue and expand in non-permitted structures. However, unlicensed activities generally conceal operations to avoid detection and are located in more remote and/or heavily screened areas. These operations would be difficult to detect and would not significantly degrade scenic resources in publicly visible areas. Therefore, impacts to aesthetics and visual resources under the No Project Alternative would be similar to those secondary impacts described in Section 3.1, Aesthetics and Visual Resources. While some new structural development related to unlicensed cannabis operations could occur in public viewsheds, visual impacts may be less than the Program as there would be no requirement to construct up to 228 residences or required site improves to meet the County Fire Code requirements, including up to 568 large water tanks, new roadways, and vegetation clearing. Therefore, impacts would be relatively less than the Project and More Permissive Project and would be less than significant.
Agricultural and Timber Resources

Under the No Project Alternative, no licensed cannabis activities would occur, and unregulated cannabis operations would continue to adversely affect agricultural and timber resources. Continued and accelerated unlicensed cannabis cultivation Countywide would potentially result in the loss of timberland through land clearing in remote areas, degradation or loss of farmland, degradation of soils (e.g., loss of top soil through clearing activities, related cannabis manufacturing activities upon prime soils, etc.), and adverse effects to lands identified as important farmland for the state or local level, and Williamson Act contract lands, especially within the South County and North Coast Regions. The areas with the largest potential for continued adverse impacts occur in the North Coast and Mountain Regions due to the greater amount of known unregulated operations in these areas. Adverse impacts would result from continued or accelerated unlicensed cannabis cultivation in heavily forested areas with steep slopes and tree cover, as opposed to open agricultural land typically within agricultural zoned land areas, and areas with dense tree cover would be affected by illegal cultivation practices involving clear cutting of trees and stepped mountainside grading, notably in the valleys and remote areas of the North Coast or South County Regions. Therefore, impacts to agricultural and timber resources under the No Project Alternative would be similar to those secondary impacts described in Section 3.2, Agricultural and Timber Resources and would be significant and unavoidable.

Air Quality

Under the No Project Alternative, no licensed cannabis activities would occur, and unregulated cannabis operations would continue to emit air pollution and objectionable odors. Potential increased operation of unregulated sites would not comply with local requirements and regulations compared to both Program scenarios. As such, air pollution and objectionable odor impacts would occur from operation of unregulated sites, including the use of diesel or gasoline generators, not using commercial air scrubbers on indoor cultivation or manufacturing operations, and not observing setbacks so that the strong odor associated with cannabis, especially during the flowering phase, do not disturb nearby sensitive receptors. Unregulated manufacturing operations may also engage in activities which have the potential to contribute to harmful air emissions from the release of combustion materials or other volatile gases. Unregulated cultivation and manufacturing sites may also engage in activities such as the illegal burning of trees and brush for site clearance, in addition to burning agricultural waste rather than taking it to a landfill or composting it, which would further contribute to particulate emissions. Further, vehicle trips associated with cannabis activities would contribute significant amounts of NOx on an ongoing basis, similar to the Program. As emissions would occur unmitigated, operational impacts related to air emissions and objectionable odors would be significant and unavoidable under the No Project Alternative and greater than both the Project and the More Permissive Project. Construction-related impacts may be comparable to the Project and More Permissive Project related to site clearing for cannabis operations, such as greenhouse and outdoor cultivation; however, such impacts would not involve required site improvements such as residential development, water storage tanks, widened roads. Therefore, the No Project Alternative is expected to generate fewer construction-related emissions, including dust (particulate matter), diesel emissions, and volatile organic compounds. Construction-related impacts would be expected to be less severe than the Program and less than significant.

Biological Resources

Under the No Project Alternative, impacts of unregulated cannabis operations on biological resources would be more severe compared to both Program scenarios since unlicensed cannabis activities
would not be subject to the County’s rigorous standards in the SCCC or proposed mitigation measures protecting sensitive biological resources. Existing and future operators may continue to clear-cut forests, remove sensitive habitats, expose hazardous materials into such habitats, adversely affect stream habitats, and engage in other non-permitted development activities that prevent the passage of wildlife or divert streams crucial to the life cycle of aquatic or riparian species. Due to the increased anticipated amount of unlicensed cultivation and manufacturing anticipated compared to both Program scenarios, impacts would be greater and considered significant and unavoidable.

**Cultural Resources**

Under the No Project Alternative, impacts of unregulated cannabis operations on cultural resources would be greater compared to both Program scenarios. The location of unregulated cannabis under this alternative would be variable and would occur throughout the County, including areas with known historical resources, archaeological resources, tribal cultural resources, human remains, or paleontological resources, or areas with a high potential to encounter unknown resources. Unregulated cannabis cultivators and manufacturers would not be regulated by state and County guidelines and regulations pertaining to cultural resources, or any mitigation measures identified for the Program to protect potentially historic structures. Therefore, unregulated cannabis activities could potentially have an adverse effect on archaeological resources, tribal cultural resources, human remains, and paleontological resources from unpermitted ground disturbance, site development, and reuse of existing structures. Because no cannabis operations would be regulated by adopted standards, potential adverse impacts are greater than both Program scenarios and impacts would greater and considered significant and unavoidable.

**Geology and Soils**

Due to the unknown nature of unregulated sites under the No Project Alternative in more remote areas screened from public view, such as remote mountainous properties and residential properties, cannabis operations would continue to operate without adherence to County policies or SCCC regulations pertaining to siting, grading, and erosion control. Therefore, unlicensed cannabis activities could contribute to increases in geological and soil hazards associated with extensive grading or clear cuts and related soil erosion, sedimentation, alterations of site topography, and exacerbated erosion. Potential adverse impacts to geologic and soil resources could be greater than both Program scenarios due to increased amounts of unregulated activities and the absence of SCCC compliance. Although this alternative would not involve the extent of required site improvements such as residential development, water storage tanks, widened roads, the potential for unchecked site grading and soil disturbance could have adverse effects on erosion and slope stability. Therefore, impacts would be greater than the Program and are considered significant and unavoidable.

**Greenhouse Gas Emissions and Climate Change**

Under the No Project Alternative, all potential cannabis activities would be unlicensed and would contribute to increased GHG emissions from high energy demand, including both from public utilities energy providers and the use of portable diesel and gasoline generators on a stationary basis for extended periods of time as a site’s main energy source. Vehicles and water demand would also contribute to GHGs from unregulated cannabis activities. Therefore, impacts related to GHG emissions and produced by the construction and operation of future unregulated cannabis cultivation and/or manufacturing sites, and their associated infrastructure would be substantial and adverse, similar to the secondary impacts discussed in Section 3.7, Greenhouse Gas Emissions. Similar to the Air Quality
analysis above, since the locations and nature of these unregulated activities throughout the County would remain largely unknown and have no potential for mitigation, operational impacts would be significant and unavoidable and be greater than both the Project and the More Permissive Project; however, the No Project Alternative would not involve required site improvements such as residential development, water storage tanks, widened roads. Therefore, this alternative is expected to generate less construction-related GHG emissions than the Project or More Permissive Project. Construction-related impacts would be less than significant.

**Hazards and Hazardous Materials**

Impacts under the No Project Alternative would result from expanding and changing unregulated cannabis sites Countywide. Unlicensed cannabis operations have the potential to store or discharge hazardous materials, including fuels, oils, pesticides, and fertilizers. Unlicensed sites also have a high potential for activities that increase fire hazards, including use of machinery, faulty electric power, and increased human presence onsite in remote and heavily vegetated areas. Cannabis sites may also locate on contaminated sites, such as former oil and gas pipelines or tanks, that may release contamination during soil disturbance or excavation. Additionally, some types of cannabis product manufacturing involve storage and use of flammable and explosive materials (e.g., compressed liquefied petroleum gases). Further, risky butane honey oil (BHO) extraction labs within the rural mountainous regions where operations are less prone to discovery, and similar operations, may be concentrated in areas where adequate emergency response services or evacuation plans may not be available. These sites may continue to pose increased risk to workers and residents in the event of structure or wildfire. Unregulated facilities operating near sensitive receptors would have the potential for exposure of sensitive populations to hazards or hazardous materials. Given the uncertainty of the locations and nature of unlicensed cultivation/manufacturing and the inability to effectively ensure compliance with existing safety related policies and regulations, adverse impacts to hazards and hazardous materials would be greater than both Program scenarios and are considered significant and unavoidable.

**Hydrology and Water Resources**

Impacts under the No Project Alternative related to unregulated cannabis operations in remote areas of the County could occur related to inappropriate siting, grading, use of pesticides, runoff control, water source control, and erosion control that would adversely affect water resources, including streams and groundwater. The County’s watercourses are a primary source of groundwater recharge; a reduction in stream flow volumes may reduce groundwater infiltration along the watercourse. Unlicensed sites may rely on existing and new wells that could draw groundwater so extensively that water resources would be adversely affected. Unlicensed sites may also rely on illegal stream diversions due to the lower expense of operating a portable pump compared to drilling a new well, or be sited in areas of inundation or mudflows. Unlicensed cannabis-related development may not adhere to existing County policies or SCCC regulations intended to protect water quality, nor would these sites go through a licensing process to ensure water quality is considered in site development, potentially introducing pollutants into water bodies. Hydrologic impacts related to site disturbance and runoff from unregulated operations would remain. Potential adverse impacts to hydrology and water resources within the County would be greater than both Program scenarios and impacts would be significant and unavoidable.
Land Use and Planning

Impacts to land use and planning policy consistency under the No Project Alternative would result from land use conflicts related to unregulated cannabis activities. With continued and future unlicensed cannabis activities, impacts to surrounding land uses, neighborhood character, and quality of life issues would likely expand under this alternative. Such impacts may involve but are not limited to non-residential activities within a residually zoned neighborhood; high intensity commercial and manufacturing uses in low density or rural zone districts; nighttime activities generating light, noise, and traffic impacts in an area with sensitive populations; and intrusion of cannabis-related activities in recreational or educational areas heavily populated by children. Such neighborhood compatibility issues would also conflict with the County policy framework for orderly physical development as defined within its land use laws, policies, and the SCCC. Without a cannabis licensing program, as proposed within the Project and More Permissive Project, standards to ensure land use compatibility would not be implemented and therefore, impacts would be greater than both Program scenarios and would be significant and unavoidable.

Public Services

Under the No Project Alternative, all cannabis activities would occur unlicensed throughout the County and particularly in inaccessible rural areas. The potential impacts on public services would depend on the location and uses involved in cannabis operations, as well as the availability of public services in the area. Unlicensed cannabis development would not be subject to SCCC regulations or County policies addressing necessary emergency services. Enforcement and management of illegal cultivation and manufacturing would place increased demands upon police- and fire-related services. For example, since the Sheriff's Office responds to cannabis cases on a complaints-driven basis, it is expected that calls for service would increase commensurate with increased unregulated activates, which many adversely affect neighborhoods throughout the County. Unregulated cannabis manufacturing, including volatile extraction processes, could continue or expand in remote areas unsuitable for manufacturing, such as portions of the North Coast and Mountain regions, increasing fire and police response times with unknown adequacy of fire suppression services, thereby increasing fire and hazards risks for both residents and emergency response personnel. The population associated with unregulated cannabis would also demand other services, such as schools, libraries, and recreation, though these demands are expected to be similar to the Program. Given unlicensed cannabis cultivation would not be in compliance with SCCC regulations that address public service adequacy including acceptable emergency access, impacts related to public services under this alternative would be significant and unavoidable and greater than both Program scenarios.

Population, Employment, and Housing

Under the No Project Alternative, impacts from unlicensed operations include generation of additional but an unknown extent of employees seeking housing within the County, as well as non-permitted residential development at cannabis activity sites to house such employees and possibly their families. Such housing may not be developed in conformance with SCCC requirements to ensure safe and habitable housing, passable all season roads, emergency services, and proximity to needed family services, such as schools and retail centers. Non-permitted residential habitation could also affect neighboring land uses due to unsafe or otherwise improper site, structural, and utility improvements. Therefore, impacts to population, employment, and housing would greater than both Program scenarios and are considered significant and unavoidable.
Transportation and Traffic

Under the No Project Alternative, unlicensed cannabis operations would occur throughout the County, which would increase the number of cultivators and manufacturers who would operate in areas with inadequate emergency access and potential traffic hazards compared to both Program scenarios. Operations that generate traffic from employees and operations 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, without standards to ensure adequate access. Trips generated from unlicensed cannabis operations would exacerbate traffic congestion on local roads and highways already operating at unacceptable levels. Therefore, unlicensed operations would exacerbate impacts to transportation and traffic more so than the Program and impacts would be significant and unavoidable.

Utilities and Energy Conservation

Under the No Project Alternative, a greater number of unlicensed cannabis activities would occur than under the Project or More Permissive Project, which would result in greater adverse impacts to water, wastewater, and solid waste services or infrastructure compared to both Program scenarios. Illegal operations would occur without SCCC or County policy compliance, and could include unregulated groundwater or surface water diversion, improper disposal and treatment /non-treatment of wastewater generated onsite, or the improper storage, handling, and disposal of municipal solid waste, as well as cannabis plant waste products and high levels of nonrenewable energy consumption. The No Project Alternative would result in greater impacts to utilities and energy conservation than under both Program scenarios, and impacts are considered significant and unavoidable.

Conclusion and Relationship to Project Objectives

This alternative would not reduce significant impacts of the Program related to a less than significant level, with the exception of construction-related air quality and GHG emissions. Essentially, this alternative would perpetuate the secondary impacts of the Program related to unlicensed cultivation, which would be greater than the Program since all existing and future commercial cannabis activities would occur without the benefit of the licenses. As such, adoption of the No Project Alternative could result in greater impacts related to all resources described above and would not reduce the significant Program impacts related to air quality and transportation. Similarly, significant and unavoidable impacts associated with unlicensed cannabis activities under the Project and More Permissive Project would be similar to this alternative for nearly all resources.

Additionally, this alternative would achieve none of the Project objectives (see Chapter 2, Project Description). This alternative would not develop any program to encourage cannabis cultivators and cannabis product manufacturers to operate legally, would not ensure compatibility of commercial cannabis activities with surrounding land uses, would not minimize adverse effects on natural resources or wildlife, and would not facilitate participation within the County or in accordance with recently-adopted state regulations.

4.2.2 Alternative 1 — Most Restrictive Alternative

In almost all EIRs, there is some form of a reduced project alternative that is analyzed with the intent of reducing environmental resource, public service, and utility impacts. This alternative is often perceived to result in less environmental impacts than the main project analyzed in the EIR due to the
decreased amount of development permitted. The success of this approach varies by project type and the particular environmental circumstances that surround the project. However, regulatory programs must also consider the feasibility and appeal of the program in terms of participation and success in alleviated unregulated activities. The Most Restrictive Alternative considers environmental impacts under a modified set of licensing regulations that would severely reduce the areas of eligibility in the County where licenses may be issued for commercial cannabis activities (Figures 4.1a and 4.1b). The intent of this alternative is to reduce impacts by constraining the level of licensed activities to limited areas in the County, including commercial and manufacturing zone districts. Under the Most Restrictive Alternative, increased setbacks would be implemented, cultivation and manufacturing would not be allowed in rural mountainous or residential areas, and outdoor cultivation would not be licensed.

The Most Restrictive Alternative would modify the proposed Project scenario as follows:

- Ineligibility of cultivation within RA and TP zoning districts
- Consideration of two approaches to SU zoning district eligibility:
  - Option 1. Ineligibility of cultivation for only those SU zoned parcels with residential general plan land use designations
  - Options 2. Ineligibility of cultivation for all SU zoned parcels
- No outdoor cultivation; only indoor cultivation and indoor greenhouse cultivation allowed
- Within the Coastal Zone + 1 mile buffer area, cultivation only allowed in CA, A, M1, M2, M3, and C4 zoning districts
- A residence or caretaker units is required on cultivation sites within all eligible zoning districts, including CA
- Increased required setback to perennial stream, water body, or wetland from 100 feet to 200 feet
- Manufacturing would only be permitted on M1, M2, M3, C2 (only if in a licensed dispensary), and C4
- Increased setbacks between habitable structures and cultivation in the A zone district
- No cannabis activities licensed on public lands

These restrictions would be implemented through development standards and zoning regulations included under this alternative to reduce the area of eligibility compared to the proposed Project scenario (Figure 4.1a and 4.1b).
Most Restrictive Alternative – Option 1: Area of Eligibility for Cultivation Licenses
Most Restrictive Alternative – Option 2: Area of Eligibility for Cultivation Licenses
Similar to both Program scenarios, the 2016 License Registration limits the total number of potential cultivation licensees to a maximum of 760, though the licensees may locate anywhere within the reduced areas of eligibility. Data collected indicated that 567 registrants currently cultivate, while 193 registrants propose new cultivation in the future under the Program. Data collected also provided the location of 259 potential sites for licensing, which allows for comparison between the Program alternatives for what portion of registrants may qualify. Under this alternative, data indicates that approximately 19 percent to 20 percent of registrants would be eligible for licensing based on site location within the Program's area of eligibility (Table 4-1). This comparison characterizes the relationship between the regulations and the desired locations of the cannabis industry.

<table>
<thead>
<tr>
<th>Table 4-1</th>
<th>Comparison of Registrant-Provided Cultivation Sites Eligibility under the Program and Alternative 1</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Project</td>
</tr>
<tr>
<td>Total Registrant-Provided Sites</td>
<td>259</td>
</tr>
<tr>
<td>Potentially Eligible after Program Regulatory Constraints are Considered</td>
<td>145 (56%)</td>
</tr>
<tr>
<td>Potentially Ineligible Sites</td>
<td>114 (44%)</td>
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</tbody>
</table>

Further, a summary of area of eligibility under Alternative 1 compared to the Program is provided in Table 4-2. The Most Restrictive Alternative would reduce the total amount of eligible area and sites compared to both Program scenarios. As indicated within the table, the Most Restrictive Alternative would have the least eligible area and would involve the most relocation to move the 760 existing and proposed cannabis businesses into eligible areas under the Program scenarios and alternatives. It would also concentrate cannabis business in focused areas of the County compared to the Program (Figure 4-1a and 1b).

<table>
<thead>
<tr>
<th>Table 4-2</th>
<th>Alternative 1 Most Restrictive Alternative Area of Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Project</td>
</tr>
<tr>
<td>Area of Eligibility for Cultivation Licenses</td>
<td></td>
</tr>
<tr>
<td>Total Eligible Area (acres)</td>
<td>147,750</td>
</tr>
<tr>
<td>Total Eligible Sites</td>
<td>6,228</td>
</tr>
</tbody>
</table>

As with both Program scenarios, while it is possible that some registrants may not ultimately receive licenses to cultivate cannabis commercially, the County's goal is to assist all 760 registrants in finding a suitable location and configuration consistent with the Program. For this alternative, these 760 registrants would need to find locations within the reduced area of eligibility as depicted in either Figure 4.1a or 4.1b. While it may appear that many registrants are ineligible for cultivation licensing,
it is assumed that these sites would relocate under the Program; therefore, all registrants are considered as part of this EIR alternative.

As with the Project and More Permissive Project, the approximate total area of eligibility for cannabis product manufacturing under this alternative decreases substantially from both Program scenarios and manufacturing facilities would be centered into select areas of the County within commercial and manufacturing districts. This would result in a decrease in total number of cannabis manufacturing operations and associated developed area, as there is no registration process required for manufacturing licenses. The reduced area that would be eligible for manufacturing licenses would limit the opportunity for business to secure a license in the County.

While the reduction of current and future cultivation sites under this alternative would result in some direct natural environment and community benefits for regulated and licensed cannabis businesses, the Most Restrictive Alternative has the potential to result in increased secondary impacts associated with continued or increased non-permitted cultivation and manufacturing activities that would not be eligible for a license. Many potential licensees may abandon the Program if the proposed site of licensing is not eligible and would continue either in place or in a new location without seeking a license. Such operations would not be subject to licensing criteria requirements, development standards, and regulations associated with licensed facilities and could result in continued or increased adverse effects upon the environment, such as clear cutting of forests and sensitive habitats, unregulated volatile manufacturing, water diversions, non-regulated waste water effluence, sedimentation and erosion concerns, greater fire safety and security risks, degradation of neighborhood quality of life, as further described herein. By not accommodating a substantial proportion of existing and projected demand for commercial cannabis opportunities as represented in the License Registration data, the Most Restrictive Alternative may result in substantially greater secondary impacts than the Program.

Potential Impacts to Resource Areas

Aesthetics and Visual Resources

*Impact AV-1:* Under Alternative 1, no outdoor cultivation would be permitted, so fencing requirements would not be necessary. Developments standards related to visual resources, including scenic resources and vistas, existing visual character, and effects from nighttime lighting and glare would be focused on greenhouse and indoor cultivation development. Given that a portion of the 760 registrants may seek to relocate ineligible to eligible cannabis sites, a higher density of cannabis indoor and greenhouse development may occur within the reduced eligible zones (CA, A, M1, M2, M3, C4, and possibly limited areas in SU). Cannabis cultivation in new structures could result in grading, vegetation clearing, and construction on publicly visible slopes that could have adverse impacts on scenic resources; however, less licensed cultivation would occur in rural areas of the County given the removal of RA, TP, and some or all of SU zoned lands from eligible lands. Given the potential for additional greenhouse and structural development to alter the visual character of scenic areas of the County, direct impacts would be considered *potentially significant*. However, similar to the Project and More Permissive Project, limitations on signage/advertising, design review criteria, and limitations on lighting for security purposes, are designed to ensure compatibility with the surrounding landscape to reduce the visual impacts associated with cannabis activities so that the Program would not substantially degrade the visual character in the County. Therefore, Alternative 1 impacts would be *less than significant*. 
Indirect impacts to aesthetic resources would be greater than both Program scenarios, with a similar range of impacts. While both Program scenarios would involve licensing of more eligible sites than Alternative 1, potentially increasing the spread of visual impacts throughout the County, the requirement of Alternative 1 to require permanent housing on all eligible districts similar to the Project scenario in addition to caretakers quarters on CA lands and associated visual impacts of grading, land clearing, and site improvements, would remain. Similar to both Program scenarios, impacts of this alternative would result from the construction of up to 228 new onsite residential units required to cultivate, along with additional residences on all other cannabis cultivation sites plus any associated roads, utility infrastructure, and site improvements, including up to 568 120,000-gallon water tanks for fire protection, to support onsite cannabis cultivation operations. With implementation of MM AV-1.2, Visual Blending Plan for Cannabis Infrastructure, MM LU-1.1.4, Master Planned Cannabis Facilities, and MM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, impacts would be reduced to less than significant with mitigation.

Impact AV-2: Since the manufacturing component of Alternative 1 would further restrict the locations for manufacturing facilities compared to both the Project and More Permissive Project, cannabis product manufacturing under Alternative 1 would have less adverse direct impacts on scenic vistas, existing visual character, and effects from nighttime lighting and glare than the two Program scenarios and remain less than significant.

Indirect impacts under Alternative 1 could change the existing character of scenic resources near each cultivation site, notably with the implementation of new buildings and related infrastructure, including 120,000-gallon water storage tanks for firefighting, which would be constructed for manufacturing operations in areas outside municipal water service districts. Impacts would be similar to both Program scenarios, and with implementation of AV-1.2, Visual Blending Plan for Cannabis Infrastructure, MM LU-1.1.4, Master Planned Cannabis Facilities, and MM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, impacts would be reduced to less than significant with mitigation.

Secondary Impacts: Alternative 1 would decrease the number of properties eligible for licenses and increase eligible parcel size requirements more than the Project scenario, thus increasing unregulated cultivation beyond both Program scenarios. Approximately 20 percent of registrants would be located on eligible parcels and, with licensing, would be required to mitigate impacts, including visual resource effects, but the remaining 80 percent may continue as unregulated activities. There is no feasible way to eradicate all unregulated cannabis activities in the County and unlicensed cannabis cultivation is not anticipated to comply with existing SCCC regulations or proposed Program regulations that address protection of scenic resources and reduced associated impacts. However, because unregulated cannabis cultivation operations are generally difficult to detect and would not significantly degrade scenic resources in publicly visible areas, secondary impacts would remain less than significant.

Agricultural and Timber Resources

Impacts AT-1 and AT-2: Direct impacts under Alternative 1 from cannabis cultivation and manufacturing would be similar to those described in Section 3.2, Agricultural and Timber Resources. Because cannabis is identified as an “agricultural product”, conversion of outdoor cultivation to indoor or greenhouse cultivation would not lead to a conversion from agricultural soils or conflict with existing agricultural zoning or Williamson Act contracts. Unlike both Program scenarios,
manufacturing under Alternative 1 would not be allowed on CA or A zoned lands, though manufacturing activities are permitted as an ancillary use to agriculture on other lands, and impacts to agricultural and Williamson Act contract resources would be less than significant and similar to both Program scenarios.

Indirect impacts to important farmland, agriculturally zoned areas, and Williamson Act contract lands would be similar to the Program, as permanent residences and associated site improvements would be required, though much greater due to the additional requirement for caretakers quarters on CA zoned lands and permanent housing on all eligible districts. However, while there would more development of housing, there would be reduced requirements for site improvements for cannabis related structures, including water tanks, roads, and vegetation clearing. With application of existing SCCC regulations, impacts would remain less than significant.

**Impacts AT-3 and AT-4:** Direct impacts to existing zoning and use of forest land under Alternative 1 from both cultivation and manufacturing would be less than both Program scenarios, as this alternative would not allow cultivation on lands zoned for timber production (TP). For areas of the County with the potential for timber production, but not zoned TP, General Plan Policy 5.12.8 and state regulations would protect timber resource land eligible for TP. With implementation of MM AT-4.1a, Siting Allowance for New Manufacturing Structural Development, and MM AT-4.1b, Land Clearing, impacts would be less compared to the Program and remain less than significant with mitigation.

Indirect impacts to land zoned for timber uses and those lands used for timber harvesting under Alternative 1 would be similar to the Project scenario impacts for areas not zoned TP. Implementation of County Fire Code standards could result in significant loss of forested lands and trees due to required site improvements, though the area affected would be less than the Program. Implementation of MM LU-1.1.4, Master Planned Cannabis Facilities, and MM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, would reduce impacts to less than significant with mitigation.

**Secondary Impacts:** Alternative 1 would decrease the number of eligible licenses and increase eligible parcel size requirements more than the Project scenario, thus increasing unregulated cultivation beyond both Program scenarios. Approximately 20 percent of registrants would be located on eligible parcels and, with licensing, would be required to mitigate impacts, including agricultural and timber resources, but the remaining 80 percent may continue as unregulated activities. There is no feasible way to eradicate all unregulated cannabis activities in the County and unlicensed cannabis cultivation is not anticipated to comply with existing SCCC regulations or proposed Program regulations that address protection of agricultural and timber resources and reduced associated impacts. Therefore, secondary impacts would exceed that of both Program scenarios, and impacts to agricultural and timber resources would remain significant and unavoidable, despite implementation of MM AT-1.3a, Sustained Enforcement Program, and MM AT-1.3b, Annual Survey and Monitoring Report.

**Air Quality**

**Impact AQ-1:** Direct impacts would be similar to those discussed in Section 3.3, Air Quality, though incrementally reduced from both Program scenarios. Limiting the zoning districts and increasing setbacks in which cannabis cultivation may occur under Alternative 1 would lessen pollutant concentrations and objectionable odors on nearby sensitive receptors. However, concentrating cannabis cultivation and manufacturing facilities to areas primarily within the southern region of the County would increase the cumulative effect of these odors within this region. Taken together,

Indirect impacts from odors and site emissions would be similar in nature to both Program scenarios but reduced under Alternative 1, as permanent residences and associated site improvements would remain required for sites within the A zone districts in addition to a requirement for caretakers quarters on CA zoned lands and permanent housing on all eligible districts. However, RA, TP, and some or all lands zoned SU would no longer be eligible for cannabis cultivation and associated residential development would not be required, which would reduce these indirect impacts. Impacts would remain *less than significant*.

*Impacts AQ-2 and AQ-3*: Direct and indirect air quality impacts of cannabis cultivation and manufacturing under Alternative 1 would be similar to that of both Program scenarios and inconsistent with the Monterey Bay Unified Air Pollution Control District (MBUAPCD) Air Quality Management Plan (AQMP) due to the exceedance of 137 lbs/day of NOx (see Table 3.3-7) and further exceedance due to indirect impacts from installation of permanent residences on all sites, caretakers quarters on CA zoned land, and associated site improvements. Additionally, as the County is in nonattainment-transitional for ozone, nonattainment for PM10, and unclassified for CO, exceedance of NOx also exceeds adopted thresholds. Implementation of MM AQ-2.1, *Implement TDM Measures*, would reduce impacts, however direct and indirect impacts would remain *significant and unavoidable*.

*Secondary Impacts*: Under Alternative 1, secondary impacts related to air emissions and objectionable odors would be more severe due to greater amounts of indirect impacts associated with unregulated cannabis activities. The area of license eligibility is much smaller than the Program, which may lead to registrants abandoning the Program and pursuing unlicensed cannabis activities. Approximately 80 percent of registrant would not be eligible for a cultivation licenses on their current site and would either need to relocate into the smaller area of eligibility or abandon the Program. Similar to both Program scenarios, unregulated commercial cannabis cultivation and cannabis product manufacturing under Alternative 1 could expose sensitive receptors to substantial pollutant concentrations and create objectionable odors affecting a substantial number of people, be potentially inconsistent with the MBUAPCD AQMP, and potentially violate an air quality standard or 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. Despite the implementation of MM AT-1.3a. *Sustained Enforcement Program*, MM AT-1.3b. *Annual Survey and Monitoring Report*, and MM AQ-1.3. *Prohibit Cannabis Material Burning*, secondary impacts would be greater than the Program and would remain *significant and unavoidable*.

**Biological Resources**

*Impacts BIO-1 and BIO-2*: Direct impacts under Alternative 1 would consist of limited disturbance of vegetation, individual species or populations, habitats or sensitive natural communities, and the disturbance, modification, or destruction of habitat due to the cultivation of cannabis canopy. Additionally, direct impacts from manufacturing and related structural development, and operations would be similar to both Program scenarios due to the same amount of manufacturing facilities anticipated under Alternative 1. Increased cultivation setbacks from perennial stream, water body, or wetland and prohibition of cultivation in RA, TP, SU zoning districts would reduce impacts upon special-status fish species, essential fish habitat, California listed species of special concerns, nesting
birds, threatened or endangered individuals and habitat, and special status plants. However, licensed cannabis activities would be consolidated into smaller areas of the County, which would increase the risk of impact to habitat areas. The eligible areas under this alternative are generally located in areas with lower habitat value in agricultural areas, but the potential for substantial effects persists in these areas. With the implementation of MM BIO-1.1a, Special-status Species Habitat Assessment, MM BIO-1.1b, Habitat Compensation, MM BIO-1.1c, Worker Environmental Awareness Program, MM BIO-1.1d, Prevention of Spread of Nonnative Invasive Plants, MM BIO-1.1e, Roosting Bat Survey, MM BIO-1.1f, Nesting Bird Survey, MM BIO-1.1g, Pest Management Plan, MM BIO-1.1h, Water Draw Restrictions, MM BIO-2.1a, Sensitive Communities Habitat Assessment, MM BIO-2.1b, Avoid Oak Woodland, BIO-2.1c, Community Replacement, and MM HYDRO-1.1, Pesticide and Herbicide Control, direct impacts would be reduced compared to both Program scenarios and remain less than significant with mitigation.

Indirect biological resource impacts would be similar in nature to both Project scenarios but reduced under Alternative 1, as permanent residences and associated site improvements would remain required for sites within the A zone districts in addition to a requirement for caretakers quarters on CA zoned lands and permanent housing on all eligible districts. However, RA, TP, and some or all lands zoned SU would no longer be eligible for cannabis cultivation and associated residential development would not be required. Alternative 1 indirect impacts related to manufacturing may be reduced due to required siting on existing commercial and industrial zoning districts with typically less existing biological resources. Overall, because the range of the Program area is reduced under Alternative 1, associated indirect impacts would likely decrease in comparison to both Program scenarios and implementation of MM BIO-1.1a through MM BIO-1.1f, MM BIO-1.1h, MM BIO-2.1a through MM BIO-2.1c, MM HYDRO-2.2, Rainwater Harvesting for Cannabis Cultivation, and MM HYDRO-2.3, Fire Water Tank Supply Management, would ensure indirect impacts are less than significant with mitigation.

Impact BIO-3: Direct impacts under Alternative 1 on the movement of any native resident or migratory species would be less than both Program scenarios, because of the reduced amount of both cultivation and manufacturing that would be permitted on or adjacent to wildlife areas and the avoidance of fencing enclosures due to the prohibition of outdoor cultivation sites. Direct impacts would remain less than significant with mitigation. Similar to both Program scenarios, indirect impacts attributed to development of residences, caretaker units, and related infrastructure would be subject to existing plans and policies designed to protect and ensure the movement of native or migratory species throughout the County, and preserve wildlife corridors. Therefore, this impact would remain less than significant.

Impact BIO-4: Direct and indirect impacts under Alternative 1 would remain similar to both Program scenarios on adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources. Actions under Alternative 1 would require adherence to adopted plans such as the Interim Programmatic Habitat Conservation Plan for the Sandhills and SCC tree protection ordinance. With implementation of MM BIO-4.1 Avoidance of Conflict with an Approved HCP, and MM BIO-4.2, No Cannabis Activities Allowed within Sandhills Habitat or SCLTS, direct and indirect impacts would remain less than significant with mitigation.

Secondary Impacts: Secondary impacts of cannabis cultivation and manufacturing under Alternative 1 would be increased compared to both Program scenarios due to the preclusion of approximately 75 percent of cultivators and producers that may resort to illegal activities throughout the County, such as clear-cutting, destruction of sensitive habitats, the introduction of hazardous materials, unpermitted development activities that prevent the passage of wildlife or divert streams crucial to the life cycle of aquatic or riparian species. Due to the increased anticipated amount of unlicensed
cultivation and manufacturing, and despite the implementation of MM AT-1.3a and MM AT-1.3b, secondary impacts would be greater than both Program scenarios and remain significant and unavoidable.

**Cultural Resources**

*Impact CR-1:* Under Alternative 1, commercial cannabis cultivation and cannabis product manufacturing could result in physical demolition, destruction, relocation, or alteration of built historical resources. As Alternative 1 would involve a smaller potential impact area than the Project and More Permissive Project scenarios, there would theoretically be a decreased potential for adverse effects upon built historical resources. Nevertheless, the potential remains for land clearing and modifications to existing structures near properties that are known to include significant historical built environment resources, which may have an adverse effect on the physical context for the historic structure and diminish its historic value. Therefore, impacts would be similar to the Program and MM CR-1.1, *Preliminary Historic Assessment of Structures 50 Years Old or More*, would remain necessary to reduce the impact of direct impacts of Alternative 1 on built historic resources to less than significant with mitigation.

Indirect impacts under Alternative 1 would remain less than significant and similar to both Program scenarios due to existing requirements for any new development on existing built historical resource properties, which would be subject to the guidelines and regulations set forth in the General Plan, Chapter 13.10 of the SCCC, Historic Landmark L Combining District, and Chapter 16.42 of the SCCC, Historic Resources Preservation Ordinance.

*Impact CR-2:* Alternative 1 would involve licensing of a smaller potential impact area than the Project or More Permissive Project, which would result in more focused areas under Alternative 1 and would decrease the potential area for disturbance of undiscovered archaeological or paleontological resources under the Program. Nevertheless, site preparation and grading activities for new developments could still inadvertently uncover archaeological, tribal, or paleontological resources. Impacts would be similar to the Program. Compliance with all County policies, SCCC, and guidelines that protect significant cultural resources would ensure that both direct and indirect impacts of Alternative 1 to archaeological resources, tribal cultural resources, human remains, and paleontological resources would remain less than significant.

*Secondary Impacts:* Due to the inability to predict the location of unregulated cultivation and manufacturing sites and the likelihood that future unregulated commercial cannabis cultivation would result in the damage or demolition of known or potential historic resources, in addition to the potential for more unlicensed cultivation and manufacturing sites, secondary impacts of Alternative 1 would exceed that of the Project and the More Permissive Project upon built historic resources. However, since the locations of all built historic resources in the County are known, with implementation of MM AT-1.3a, *Sustained Enforcement Program*, and AT-1.3b, *Annual Survey and Monitoring Report*, it is possible to enforce appropriate practices related to historic resources on these properties. However, as noted in Section 3.5, *Cultural Resources*, it is impossible to know where undiscovered sensitive archaeological and paleontological resources exist unless the person who discovers these resources alerts the County. Since unregulated cultivators are unlikely to alert the County if their ground-disturbing activities uncover such resources, adverse impacts would still occur under Alternative 1. Due to an anticipated increase of unlicensed growers operating under Alternative 1, even with implementation of MM AG-1.3a and AG-1.3b, residual secondary impacts to archaeological resources, tribal cultural resources, human remains, or paleontological resources...
would exceed that of both the Project and the More Permissive Project and would remain significant and unavoidable.

**Geology and Soils**

*Impact GEO-1*: Direct impacts of Alternative 1 on geological stability, including landslides and erosion, would be similar to the Project and More Permissive Project. Potential geologic impacts associated with cultivation activities under the Program would be mitigated by existing County policies and regulations. With the application of existing regulations, direct Alternative 1 impacts associated with geologic hazards would be considered less than significant.

Indirect impacts upon geologic and soil resources would be increased under Alternative 1, as permanent residences and associated site improvements would be required for cannabis sites in addition to a requirement for caretakers quarters on CA zoned lands and permanent housing on all eligible districts. However, RA, TP, and some or all lands zoned SU would no longer be eligible for cannabis cultivation and associated residential development would not be required. To mitigate for increased impacts, MM LU-1.1.4, Master Planned Cannabis Facilities, and MM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, should be modified to include CA zoning district for potential alternate site development requirements. Therefore, indirect impacts associated with geologic hazards under Alternative 1 would be slightly less than the Program and would remain less than significant with mitigation.

*Impact GEO-2*: Cannabis product manufacturing under Alternative 1 in commercial and manufacturing districts only could be exposed to or create geologic hazards, including earthquakes. Direct impacts from geologic hazards would be less than both Program scenarios, as manufacturing facilities are anticipated to be centralized within existing commercial and manufacturing districts, largely located in the South County Region, and is generally flat without substantial geologic hazards other than liquefaction risk. Application of existing SCCC requirements would ensure impacts would be less than significant, and slightly reduced compared to both Program scenarios.

Indirect geologic impacts from manufacturing under Alternative 1 would be similar to both Program scenarios, however would be reduced due to the reduction of allowable areas for new manufacturing facilities. Impacts would be slightly less than the Program and remain less than significant.

*Secondary Impacts*: Secondary impacts from Alternative 1 could be created through continued or accelerated unlicensed cannabis cultivation Countywide as approximately 80 percent of potential cannabis cultivators would be excluded by the Alternative 1 standards and requirements. Given unlicensed cannabis cultivation would not comply with existing SCCC regulations that address geologic hazards such as siting, grading, and erosion control and reduced associated impacts, secondary impacts related to unlicensed cannabis cultivation and geologic hazards under the Program would remain substantial and would be greater than the Program, as more sites may continue as unregulated operations. Operational activities, including volatile extraction processes, may also occur in structures that are not designed to withstand exposure to unstable ground conditions, particularly ground failure during seismic events. Though MM AT-1.3a, Sustained Enforcement Program, and AT-1.3b, Annual Survey and Monitoring Report, would address unlicensed cultivation on an ongoing basis and reduce secondary impacts over the life of Alternative 1, potential adverse impacts to geologic hazards, soils, and minerals would be greater than both Program scenarios due to increased amounts of unregulated activities and impacts would remain significant and unavoidable.
Greenhouse Gas Emissions and Climate Change

*Impact GHG-1:* Direct and indirect impacts to GHGs would be similar to both Program scenarios, as direct cannabis activities from Alternative 1 would result in estimated emissions of 13.4 MT CO\textsubscript{2}e/service population (SP)/year, exceeding the Bay Area Air Quality Management District’s (BAAQMD) recommended GHG threshold of 4.6 MT CO\textsubscript{2}e/SP/year. Additionally, indirect impacts would remain similar to both Project scenarios due to the necessity for permanent residences with associated site improvements, and incrementally greater due to the requirement for a residence or caretakers quarters on CA zoned lands. Implementation of MM LU-1.1.6, Cannabis Best Management Practices, and MM GHG-1.1, Alternative Energy Sources, would reduce the impacts of cannabis cultivation and manufacturing through the increase of energy efficiency, consistency with the County’s Climate Action Strategy (CAS), and the County’s and state’s goals for GHG reduction. Impacts would therefore be similar to both Project scenarios and *less than significant with mitigation.*

*Secondary Impacts:* Though MM AT-1.3a, Sustained Enforcement Program, and AT-1.3b, Annual Survey and Monitoring Report, would address unlicensed cultivation on an ongoing basis and reduce secondary impacts over the life of Alternative 1, potential adverse impacts from greenhouse gas emissions would still occur, and greater than both Program scenarios due to decreased amounts of regulated activities and increased amounts of illegal operations. Impacts would remain *significant and unavoidable.*

Hazards and Hazardous Materials

*Impact HAZ-1:* Under Alternative 1, direct impacts from construction and operation would result from the use, storage, transport, or discharge of potentially hazardous materials. Cannabis cultivation would be consolidated into a smaller area of the County, which could increase risks of upset in some areas but reduce risk in others; however, commercial cannabis cultivation would be subject to existing laws and regulations governing the cultivation of commercial food products and associated hazardous activities. Therefore, direct impacts would be similar to both Program scenarios and remain *less than significant.*

Indirect impacts from handling or release of hazardous materials during construction and operation of residential units than the Program and associated roads, driveways and infrastructure, as well as onsite fire water tanks would also be greater than both Program scenarios due to the anticipated residences, caretaker units, and ancillary features anticipated. The permit review process, review by the Licensing Office, and application of existing federal, state, and local regulations governing the use of hazardous agricultural chemicals and activities would ensure impacts remain *less than significant.*

*Impact HAZ-2:* Direct impacts from commercial cannabis product manufacturing and associated use of hazardous materials would be reduced compared to that of both Program scenarios. Because Alternative 1 limits manufacturing to industrial and commercial areas, there exists limited potential for the construction of new facilities with hazardous uses on lands primarily used for residences or agriculture (such as prohibiting manufacturing on residential and agricultural zoning districts) and limited potential for the introduction of hazardous materials to areas without existing hazardous materials use. Therefore, impacts would be less than both Program scenarios and remain *less than significant.*

Indirect impacts of Alternative 1 from utility and ancillary facility manufacturing activities and their associated hazards would be managed by federal, state, and local regulatory requirements, and this alternative impact would not require mitigation to remain *less than significant.*
**Impact HAZ-3:** Direct impacts from cannabis cultivation and manufacturing located in high fire hazard, wildland areas would be reduced compared to both Program scenarios, primarily due to the prohibitions of outdoor cultivation and cultivation on TP and some or all of SU zoning districts. Because TP and SU zoning districts contain a large amount of high fire hazard and wildland areas (due to associated timber resources contained within these districts and their associated fire and access hazards), restricting cultivation and manufacturing outside these locations would reduce the risk of associated exposure of people and structures from wildland fires and interference with emergency evacuations. Nevertheless, compliance with CalFire defensible space requirements, County Building Code, and County Fire Code regulations on other eligible parcels within fire hazard areas within CA, A, M, and C4 zoning districts would ensure protection of proposed facilities from wildfire hazards and impacts would remain less than significant.

Indirect impacts from new homes and site improvements to support cannabis business may occur when located within high fire hazard areas, exposing people or structures to significant risks involving wildland fires, would be similar to both the Project and More Permissive Project, notably in the requirement for County Fire Code compliant ancillary structures such as requiring a 120,000-gallon water tank, a 20-foot wide road, and 100 feet of vegetation clearing around the structure that would increase hazards to environments and habitats throughout the County. Alternative 1 requires the Licensing Official to ensure that operations comply with the County Fire Code prior to issuance of a license, therefore impacts are considered less than significant and similar to both Program scenarios.

**Secondary Impacts:** Secondary impacts under Alternative 1 on the use, transport and disposal of hazardous materials would be greater than that of the Project and More Permissive Project due to the higher number of unlicensed cannabis cultivators that would not adhere to permit requirements, review by the Licensing Office, or application of existing federal, state, and local regulations governing the use of hazardous agricultural chemicals. Limiting cultivator access to the use of manufacturing facilities would result in a need that may be pursued in illegal and dangerous alternatives (i.e., some forms of BHO extraction labs). With the lack of enforcement and regulations of these operations, there is a greater chance that these sites may not comply with policies or regulations designed to reduce fire hazards, especially those concentrated in the mountains and forested regions of the County not covered by this alternative (such as those within TP and SU areas). With implementation of MM AT-1.3a, Sustained Enforcement Program, and AT-1.3b, Annual Survey and Monitoring Report, to implement surveying and sustainable enforcement mitigations, secondary impacts would be reduced over the life of the Program, though would remain worse than both Program scenarios and significant and unavoidable.

**Hydrology and Water Resources**

**Impact HYDRO-1:** Direct impacts from commercial cannabis cultivation under Alternative 1 related to sedimentation and other pollutants to surface flows and groundwater, groundwater supplies, and groundwater recharge would be similar in nature to both Program scenarios. Alternative 1 would also allow licensed cannabis cultivation in accordance with existing water quality regulations, and application of surface runoff requirements, hazardous material control, and use of pesticides, herbicides, and rodenticides would require adherence to existing regulations. Similar to both Program scenarios, the potential use of pesticides and rodenticides and related water and groundwater contamination would remain. MM HYDRO-1.1, Pesticide and Herbicide Control, MM HYDRO-1.2, Cleanup and Restoration Plan for Relocated Cultivation Sites, and MM HYDRO-1.3, Sanitary Sewer Survey, would remain necessary, resulting in direct impacts that less than significant with mitigation.
Indirect impacts would be similar in nature to the Project and More Permissive Project but would require either a residence or caretaker unit for all sites. Similar to Impact HYDRO-1 above, existing regulations would protect water quality from degradation associated with associated residential site improvements, including sedimentation and discharge of pollutants to water resources. For other ancillary structures, integration of MM LU-1.1.4, Master Planned Cannabis Facilities, and MM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, would ensure impacts remain less than significant with mitigation.

Impact HYDRO-2: Direct impacts to groundwater supplies and groundwater recharge would be incrementally greater than both Program scenarios. Because the area of eligibility for licensing focuses on the South County and Urban Regions, a higher number of cannabis cultivators could relocate to this area. The increase in groundwater use within these Regions, which overlies groundwater basins that are in a stage of overdraft and serve agricultural demands, increases in groundwater resource demands have the potential to exacerbate overdraft conditions and adversely affect groundwater resources, including increased rates of seawater intrusion. Groundwater resources may therefore be more intensively affected by this alternative than either Program scenario. With implementation of MM HYDRO-2.1, Water Efficiency for Cannabis Cultivation, and MM HYDRO-2.2, Rainwater Harvesting for Cannabis Cultivation, impacts would be less than significant with mitigation and incrementally greater than both Program scenarios.

Indirect impacts to groundwater supplies and groundwater recharge would be similar to both Program scenarios. Under Alternative 1, required ancillary facilities would include 120,000-gallon water tanks for nearly all sites proposing cannabis cultivation, storage, or processing. Implementation of MM HYDRO-2.3, Water Tank Supply Management, would ensure impacts are similar to both Program scenarios and less than significant with mitigation.

Impact HYDRO-3: Direct and indirect impacts of commercial cannabis cultivation under Alternative 1 on existing drainage patterns, including the alteration of the course of streams or rivers and the potential to place people or structures in areas of inundation or mudflows, including 100-year floodplains, would be less than both Program scenarios. Due to the relatively small size of cultivation operations compared to many other agricultural operations, limitations of building within floodplains and increased setbacks from streams and high-water mark areas, and adherence to the County’s Grading and Erosion Control Ordinances (Chapters 16.20, 16.22, and 7.79 of the SCCC), direct and indirect impacts would be reduced. Additionally, with application of existing regulations to maintain drainage patterns and hydraulic capacity, impacts to drainage patterns would remain less than significant.

Impact HYDRO-4 and HYDRO-5: Direct and indirect impacts of manufacturing under Alternative 1 associated with sedimentation and discharge of other pollutants to surface flows and groundwater; groundwater supplies and groundwater recharge; alteration of existing drainage patterns (e.g., stream course, river flow, etc.); and the potential to place people or structures in areas of inundation, mudflows, or 100-year floodplains would be similar to both Program scenarios. With application of existing regulations, impacts would remain less than significant.

Secondary Impacts: Secondary impacts would be greater than both Program scenarios due to a greater anticipated amount of unlicensed cannabis cultivation development and associated unpermitted grading and development practices that may interfere with groundwater infiltration and introduce sediments and pollutants to receiving water bodies. Additionally, a greater number of unlicensed cannabis cultivators would result in unpermitted discharges of fill material to water courses.
diversions of streams, and obstructed drainage patterns. County enforcement data demonstrates that poorly operated unlicensed grow operations in watersheds have erosion and sedimentation impacts on receiving waters. Despite the implementation of MM AT-1.3a, *Sustained Enforcement Program*, and AT-1.3b, *Annual Survey and Monitoring Report*, impacts would remain *significant and unavoidable* and greater than both Program scenarios.

**Land Use and Planning**

*Impact LU-1*: Direct and indirect impacts to land use and planning policy consistency would be similar than both the Project and More Permissive Project scenarios. Similar to the Program scenarios, Alternative 1 would involve site development requirements including installation of large water storage tanks (e.g., 120,000 gallon) and related clearing and grading, additional County Fire Code requirements (e.g., 20-foot wide roads in remote rural lands, 100-foot radius vegetation clearing), and exclusion of rural towns in the USL/RSL outside the Coastal Zone + 1-mile buffer area. However, this alternative does not contain a land use conflict in SU zoned parcels, as consideration for underlying land use designations would prevent cultivation on parcels intended for non-agricultural or manufacturing uses (i.e., residential). Implementation MM LU-1.1.3. *USL + RSL Allowances*, MM LU-1.1.4. *Master Planned Cannabis Facilities*, and MM LU-1.1.5, *Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities*, and MM LU-1.1-6, *Cannabis Best Management Practices*, would ensure impacts are similar to the Program and *less than significant with mitigation*.

*Impact LU-2*: Direct and indirect impacts could occur under Alternative 1 from cannabis cultivation and manufacturing upon existing communities due to traffic, odors, noise, or other quality of life issues. Unlike both Program scenarios, manufacturing would not be allowed within residential zoning districts, reducing potential neighborhood compatibility issues or perceived change in quality of life. However, introducing a greater concentration of cannabis cultivation and manufacturing facilities to the South County and Urban Regions would increase associated amounts of traffic, odor, and noise that may detrimentally affect quality of life issues in that area. Increased setback requirements from A zoned sites from neighboring habitable structures would further reduce potential land use conflicts. Potential adverse effects on the surrounding neighborhood, and direct and indirect impacts to existing communities would be slightly more adverse, but would remain *less than significant*.

**Secondary Impacts**: Impacts to land use and planning policy consistency under Alternative 1 would result from land use conflicts related to unregulated cannabis cultivation and manufacturing activities, as unregulated cultivators and manufacturers would likely continue to operate illegally, or would not be able to obtain a license, as only 20 percent of registrants would be eligible for a cultivation license under this alternative. Impacts to neighborhood compatibility and plan inconsistency would result from land use conflicts related to unregulated cannabis cultivation and manufacturing activities within or adjacent to existing communities, especially in areas of the County known for cultivation such as the Mountain and North Coast Regions. Alternative 1 would not allow additional registration opportunities to become legally licensed, and so impacts would be similar to the Project scenario as unregulated cannabis cultivators and manufacturers would not be offered future opportunities to comply with land use and zoning. With the implementation of MM AG-1.3a, *Sustainable Enforcement Program*, and MM AT-1.3b, *Annual Survey and Monitoring Report*, the quantity of illegal operators may be reduced over time, however the practice would still occur and impacts would be greater than both Program scenarios and become *significant and unavoidable*. 
Public Services

*Impacts PS-1 and PS-2:* Direct and indirect impacts from cannabis cultivation and manufacturing under Alternative 1 would increase demand for fire protection, police protection, public schools, parks, libraries, and other public facilities, similar to both Program scenarios.

**Fire Protection:** Because Alternative 1 restricts cultivation and manufacturing areas from RA, TP, and US zoning districts, the potential for population increases in high fire risk zones would also be reduced. Nevertheless, implementation of this alternative could potentially consolidate cannabis sites and related population into other high fire risk zones containing eligible zoning districts, which would increase service demands. Licensees must comply with Fire Protection Policies 7.16.1 and 7.16.2 to ensure emergency access, evacuation routes, and appropriate structural development. With compliance with fire safety inspections for new residences, building inspections, fire code investigations, and code compliance, overall risk of fire would be reduced and direct and indirect impacts would be *less than significant* and less than both Program scenarios.

**Police Protection:** Impacts would be similar to both Program scenarios, with increased levels of employment, employee population, and police staffing levels. Impacts would be less than the Program and would remain *less than significant*.

**Parks, Schools, Libraries and Other Public Services:** As under both Program scenarios, Alternative 1 would potentially generate additional full-time cultivation employees, which would contribute to increased demand for housing, as well as the use of parks, schools, libraries, and other public services by the employees’ families. As discussed in Section 3.11, Public Services, population increase would not represent a substantial increase in demand for these public services, though a higher concentration of this population in the South County and Urban Regions due to eligible cultivation and manufacturing sites may create an unequal distribution of needs for services. Ultimately, impacts would remain *less than significant* and similar to both Program scenarios.

**Secondary Impacts:** Unregulated cannabis cultivation and manufacturing activities under Alternative 1, 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 cultivation and manufacturing may occur in remote areas such as in the North Coast and Mountain regions, lacking adequate emergency access routes and further increasing response times. Given that unlicensed cannabis cultivation would be greater than both Program scenarios and would not comply with existing SCCC regulations that address public service adequacy including acceptable emergency access, impacts would greater than the Program. Despite the implementation of MM AT-1.3a, *Sustained Enforcement Program*, and MM AT-1.3b, *Annual Survey and Recording*, which would address unlicensed cultivation on an ongoing basis, impacts related to public services under this alternative would be *significant and unavoidable* and greater than both Program scenarios.

Population, Employment, and Housing

*Impact POP-1:* As under both Program scenarios, direct impacts of Alternative 1 would result in an increase of full-time cultivation employees Countywide similar to the Program. While the increase in housing demand from cannabis industry employees may be substantial, the County maintains programs and policies to ensure adequate provision of housing to meet ongoing demands, particularly when the demand is generated from local industries, including Measure J and the Housing Element. With implementation of MM POP-1.1, *Affordable Housing Fee for Agricultural Buildings Used for...*
Commercial Cannabis, impacts would be similar to both Program scenarios and remain less than significant with mitigation.

Indirect impacts under Alternative 1 on population, employment, and housing would result in the construction of new housing units on some cannabis cultivation sites, especially within the South County and Urban Regions. Alternative 1 would involve the same number of licenses on a smaller quantity of eligible sites compared to both Program scenarios. Additionally, this alternative would require permanent residences, and would ultimately create more permanent residences. The increase of permanent housing in the County would increase the County’s housing stock, and enable a higher number of people to live in the County (a permanent increase in County population). Given the geographic limitations of Alternative 1, residential development would be limited to pockets of the County where cannabis activities have the potential to grow, as further discussed in Section 3.15, Other CEQA Issues. Therefore, indirect impacts to population and housing under Alternative 1 would be considered similar to both Program scenarios and remain less than significant.

Secondary Impacts: Under Alternative 1, more potential cannabis cultivators would be excluded from regulating opportunities, and impacts from unlicensed cultivation may include additional employees seeking housing within the County, as well as unpermitted residential development to house employees, and impacts would be greater than both Program scenarios. Unlicensed cultivation could occur in any of the countywide regions and could continue or expand in areas unsuitable for cultivation or development of appropriately permitted housing. 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 or reduction in property values due to proximity of unsafe and unpermitted construction. With implementation of MM AT-1.3a, Sustained Enforcement Program, and MM AT-1.3b, Annual Survey and Monitoring Report, to address unlicensed cultivation on an ongoing basis, impacts would be reduced over the life of the Program. However, impacts would be greater than the Program and would remain significant and unavoidable.

Transportation and Traffic

Impact TRA-1: Direct impacts from cultivation and manufacturing on transportation and traffic under Alternative 1 would be slightly more adverse compared to both Program scenarios. Similar to the Program scenarios, an increase in vehicle trips would be generated by cannabis operations and use existing roadways. Additionally, Countywide vehicle miles traveled (VMT) increases would be similar to the Program. However, with less opportunity for licensing in the Mountain Region, it is likely that transportation demand would increase in the Urban and South County Regions. Unlike both Program scenarios, this alternative would not permit a large portion of cannabis operations in the Mountain Region, and instead would likely have a sizeable portion of anticipated average daily traffic (ADT) within the South County and Urban Regions. These Regions are served primarily by Highway 1, which does not provide adequate levels of service for existing transportation demand. While other areas of the County may not be as affected, the South County and Urban Regions may experience more significant effects than other regions under this alternative. Implementation of MM TRA-1.1, Payment Transportation Impact Fees, would help to reduce impacts, but impacts to congestion roadways would be more severe than the Program on local roads in the South County and Urban Regions and would remain significant and unavoidable.

Indirect impacts would be similar to those detailed above, given the requirement to develop residences on eligible A zone districts in addition to a requirement for caretakers quarters on CA
zoned lands and permanent residences on other eligible districts, and associated vehicle trips dispersed across the County with similar potential for incremental impacts. The residential development in the urban area would be required to pay into the County’s Transportation Improvement Area Fee Program; however, as fee payment is not sufficient to offset transportation impacts to insufficient roadways, impacts would be similar to the Program and would remain significant and unavoidable.

**Impact TRA-2:** Direct and indirect impacts of commercial cannabis cultivation under Alternative 1 could result in traffic safety hazards, inadequate emergency access, or impacts to road maintenance that is less than both Program scenarios. Eligible areas under this alternative would largely occur in rural areas with hazardous roadways, though there would be a reduced number of cultivation sites within mountainous, unmaintained roads compared to both Program scenarios. Ultimately, the potential remains similar to the Program for hazardous safety issues on rural roads for both operation vehicles and personal vehicles even within the South County and Urban Regions, and implementation of MM TRA-2.1, *Rural Road Management*, and MM TRA-2.2, *Adequate Access Roadway Design*, would ensure impacts remain less than significant with mitigation.

**Impact TRA-3:** Similar to both Program scenarios, direct and indirect impacts of manufacturing under Alternative 1 would largely be located within the urban areas of the County, accessed by urban road systems that support adequate emergency access and remain subject to existing County codes, plans, and policies to address traffic safety issues in urban areas. Therefore, impacts would be similar to the Program and would remain less than significant.

**Secondary Impacts:** Under this alternative, a greater number of unlicensed cannabis cultivators and manufacturers would occur compared to both Program scenarios, which would increase the number of cultivators and manufacturers who would operate in areas with inadequate emergency access and potential traffic hazards. Approximate 80 percent of registrants are located on sites that are ineligible for cultivation licensing under this alternative. Those operations which generate traffic from employees and operations 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. While the direct traffic effects of unlicensed cannabis cultivation/manufacturing cannot be determined, it is anticipated that ongoing operation of unlicensed operations would continue, impacts would be greater than both Program scenarios, and adverse impacts to transportation and traffic would remain significant and unavoidable, despite implementation of MM AT-1.3a, *Sustained Enforcement Program*, and MM AT-1.3b, *Annual Survey and Monitoring Report*.

**Utilities and Energy Conservation**

**Impact UE-1:** Direct impacts of cultivation and manufacturing on water, wastewater, and solid waste services within the County would be similar to both Program scenarios. The total area of canopy, water use, wastewater, and solid waste is consistent between Alternative 1 and both Program scenarios, resulting in similar impacts to the existing utility services available. However, as cultivation licenses would be consolidated into a smaller area of eligibility focused primarily in South County and Urban Regions, there is a greater potential for water supply issues related to overdrafted groundwater basins (see also, *Hydrology and Water Quality* above). Therefore, impacts on water supply and existing infrastructure would be slightly more adverse but remain less than significant, impacts on wastewater services would remain less than significant, and with implementation of MM AQ-1.3, *Prohibit Cannabis Material Burning*, MM LU-1.1.6, *Cannabis Best Management Practices*, MM HYDRO-2.1, *Water Efficiency for Cannabis Cultivation*, MM HYDRO-2.3, *Water Tank Supply Management*, and MM UE-1.1,
Cannabis Soil, Plant Material, and Waste Management would ensure impacts to solid waste are less than significant with mitigation.

Similarly, indirect impacts to water supply, wastewater, and solid waste services would be less than significant with mitigation after implementation of MM LU-1.1A, Master Planned Cannabis Facilities, MM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, and MM-HYDRO-2.2. Fire Water Tank Supply Management.

Impact UE-2: Direct impacts of cultivation and manufacturing under Alternative 1 would result in additional demand for energy resources within the County and may conflict with energy conservation policies and objectives, and would increase in comparison to that of both Program scenarios. Under Alternative 1, outdoor cultivation would not be permitted, which would result in new canopy area within indoor or greenhouse operations only. These types of operation (indoor, greenhouse) have associated demand factors between 80 kWh/sf/year and 110 kWh/sf/year, which when factored with the total proposed area of canopy, would result in a total demand for energy exceeding the estimated energy demand for both Program scenarios. Impacts would be greater than both Program scenarios, however with implementation of MM LU-1.1-6. Cannabis Best Management Practices, and MM GHG-1.1. Alternative Energy Sources, impacts would remain less than significant with mitigation.

Indirect impacts would be similar to both Program scenarios, as new, permanent single-family residences would increase demand for electrical supplies, natural gas, and transportation fuels. However, due to compliance with the California Building Code and County policies relating to energy conservation features, this alternative would not conflict with existing energy conservation standards and indirect impacts would remain less than significant.

Secondary Impacts: Under Alternative 1, a greater number of unlicensed cannabis cultivators and manufacturers would occur to both Program scenarios, which would result in greater adverse impacts to water, wastewater, energy demand, and solid waste services or infrastructure. Illegal operations would occur without SCCC or policy compliance, and could include unregulated groundwater or surface water diversion, improper disposal and treatment of wastewater generated onsite, or the improper storage, handling, and disposal of municipal solid waste, as well as cannabis plant waste products and energy consumption. Alternative 1 would result in a greater number of unlicensed cultivators compared to both Program scenarios, and despite implementation of MM AT-1.3a, Sustained Enforcement Program, and MM AT-1.3b, Annual Survey and Recording, adverse impacts to transportation and traffic would remain significant and unavoidable.

Conclusion and Relationship to Project Objectives

Alternative 1 would not reduce any significant impacts to a less than significant level. This alternative would potentially result in less adverse direct and indirect environmental impacts to air quality, biological resources, and hazards and hazardous materials. Direct and indirect impacts to agricultural and timber resources, cultural resources, geology and soils, greenhouse gases, public services, and population, employment, and housing would be similar to both Program scenarios, with some areas of the County (South County and Urban Regions) affected more than others (Mountain Region). Impacts related to aesthetics and visual resources, hydrology and water quality, land use, transportation and circulation, and utilities and energy conservation would increase, but would be subject to feasible mitigation to be similar to the Program. However, the secondary impacts of this alternative would result in adverse impacts greatly surpassing the benefits of this more focused
program. The classification of all impacts under Alternative 1 would be the same as those under the Project scenario, including significant and unavoidable air quality and transportation impacts.

Adoption of Alternative 1 would achieve some of the Program objectives which include regulating commercial cannabis cultivation and manufacturing within the County, providing an efficient and clear cultivation and manufacturing permit process and regulations, and regulating sites and premises to avoid degradation of the visual setting and neighborhood character, odors, hazardous materials, and fire hazards.

However, adoption of Alternative 1 would not achieve many Project objectives, as the adverse aspects of secondary impacts would not develop a legal, local cannabis industry to improve the County's tax base, minimize adverse effects of cultivation and manufacturing on the natural environment, natural resources, wetlands and sensitive habitats, water supply, or promote energy and resource efficiency. This alternative would make numerous cultivation and manufacturing sites ineligible, thus not encouraging cannabis cultivators and product manufacturers to operate legally and secure a license to operate in full compliance with County regulations.

### 4.2.3 Alternative 2 — Most Permissive Alternative

The Most Permissive Alternative would broaden eligibility criteria and revise some development standards to provide increased flexibility for cannabis sites and expanded opportunities for licensing and registration of commercial cannabis cultivation and manufacturing in the County.

The goal of this alternative would be to increase licensing, registration, and compliance for cultivation operations and maximize legal regulated cultivation and participation in the Program to minimize adverse impacts of unlicensed cultivation. Provision of additional licensing opportunities and increased development standard options would increase compliance with Program goals and objectives. One main objective of Alternative 2 is to legalize operations (both current and future) that may be illegal or non-compliant. This option may potentially reduce impacts associated with unlicensed grows by increasing the area of license eligibility substantially and implementing development standards that are more protective of environmental resources (e.g., setbacks) and public services. With this objective, the Most Permissive Alternative would modify the proposed Project scenario as follows:

- Allow outdoor cultivation Countywide, similar to the More Permissive Project scenario
- No unique restrictions on cultivation within Coastal Zone + 1-mile buffer area
- Co-location of multiple licenses within one parcel allowed, where each licensee is granted up to the maximum canopy allowed by the More Permissive Project (e.g., cooperatives, multiple tenants, etc.). This would provide increased opportunities to cultivate and manufacture to the relatively restricted availability of compatible sites available to license registrants under the Project scenario.
- Minimum parcel sizes may be lessened on a case-by-case basis at the discretion of the Licensing Official
- Setbacks from sensitive uses (e.g., schools) may be lessened on a case-by-case basis at the discretion of the Licensing Official
- Allow imported/trucked water for irrigation and potable use, unlike both Program scenarios
- No right-of-way setback requirements for indoor cultivation
- Manufacturing of cannabis products allowed as Cottage Industry uses under existing SCCC and state law
- Manufacturing of cannabis products allowed on County-designated cooperative sites
- No cannabis activities licensed on public lands

The analysis of this alternative addresses potential impacts to determine if these adjustments could minimize or avoid significant environmental impacts/policy conflicts and address land use consistency concerns. These restrictions would be implemented through development standards and zoning regulation included under this alternative (Figure 4-3). This alternative would also analyze the effect on secondary impacts associated with decreased unlicensed cultivation activities. It is possible that the Most Permissive Alternative would reduce some impacts by bringing more cultivators and manufacturers under licenses, given additional licensing opportunities, which could then implement substantially more protective measures for environmental resources and public services.

Under Alternative 2, the manufacturing ordinance would retain the same zoning districts where manufacturing is allowed as the proposed Program; however, multiple manufacturing licenses would be allowed on County-designated cooperative manufacturing sites. For instance, instead of requiring all manufacturing processes to occur on the cultivation site property as proposed under the proposed Project, one manufacturing site could host multiple entities. This centralized location for cannabis product manufacturing would reduce the need for new development on areas of land that may not be suitable for manufacturing structures. It is assumed that smaller home occupation-scale cannabis product manufacturers would be best served by this alternative, and that the resulting quantity of new manufacturing structures would be reduced due to the estimated 134 home occupation-scale manufacturers anticipated under buildout of the proposed Project and More Permissive Project scenarios.

Similar to both Program scenarios, the 2016 License Registration limits the total number of potential cultivation licensees to a maximum of 760, though the licensees may locate anywhere within the expanded area of eligibility (Figure 4-2). Data collected indicated that 567 registrants currently cultivate, while 193 registrants propose new cultivation in the future under the Program. Data collected also provided the location of 259 potential sites for licensing, which allows for comparison between the Program alternatives for what portion of registrants may qualify. Under this alternative, data indicates that approximately 75 percent of registrants would be eligible for licensing based on site location within the Program’s area of eligibility (Table 4-1). This comparison characterizes the relationship between the regulations and the desired locations of the cannabis industry.
Figure 4.2. Most Permissive Alternative Eligibility

11x17
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Table 4-3  Comparison of Registrant-Provided Cultivation Sites Eligibility under the Program and Alternative 2

<table>
<thead>
<tr>
<th></th>
<th>Project</th>
<th>More Permissive Project</th>
<th>Most Permissive Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Registrant-Provided Sites</td>
<td>259</td>
<td>259</td>
<td>259</td>
</tr>
<tr>
<td>Potentially Eligible after Program Regulatory Constraints are Considered</td>
<td>145 (56%)</td>
<td>165 (64%)</td>
<td>194 (75%)</td>
</tr>
<tr>
<td>Potentially Ineligible Sites</td>
<td>114 (44%)</td>
<td>94 (36%)</td>
<td>65 (25%)</td>
</tr>
</tbody>
</table>

Further, a summary of area of eligibility under Alternative 2 compared to the Program is provided in Table 4-4. The Most Permissive Alternative would reduce the total amount of eligible area and sites compared to both Program scenarios. As indicated within the table, the Most Permissive Alternative would have the most eligible area and would involve the least relocation to license the 760 existing and proposed cannabis businesses into eligible areas under the Program scenarios and alternatives. It would also distribute cannabis business in larger areas of the County compared to the Program (Figure 4-2).

Table 4-4  Alternative 2 Most Permissive Alternative Area of Eligibility

<table>
<thead>
<tr>
<th>Area of Eligibility for Cultivation Licenses</th>
<th>Project</th>
<th>More Permissive Project</th>
<th>Most Permissive Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Eligible Area (acres)</td>
<td>147,750</td>
<td>164,721</td>
<td>193,452</td>
</tr>
<tr>
<td>Total Eligible Sites</td>
<td>6,228</td>
<td>8,888</td>
<td>15,926</td>
</tr>
</tbody>
</table>

The approximate total area of eligibility for manufacturing under this alternative results in the same area of eligibility as under each Program scenario. Though the area of eligibility does not change, multiple manufacturing licenses would be allowed on the same parcel, allowing multiple license holders to use shared manufacturing facilities – reducing the necessity for new manufacturing facility development throughout the County.

Potential Impacts to Resource Areas

Aesthetics and Visual Resources

Impact AV-1: Alternative 2 does not propose aesthetic design standards that differ from either Program, and impacts to scenic resources and vistas, existing visual character, and effects from nighttime lighting and glare under Alternative 2 would largely remain similar to the Program. Licensed sites would be distributed at a lower density than the Program, which would reduce the potential for dramatic visual changes from multiple operations in one visually sensitive area. The potential for more eligible sites and licenses under Alternative 2 would allow for additional opaque fencing in areas that may create visual impacts where the natural setting would be adversely affected by new highly visible fencing. Given the potential for additional opaque fencing to alter the visual
character of scenic areas of the County, directs impacts would be considered potentially significant and greater than both the Project and the More Permissive Project. However, with implementation of MM AV-1, Fencing Requirements, impacts would be similar to both Program scenarios and less than significant with mitigation.

Indirect impacts to would likely remain similar to that under both proposed Program scenarios due to existing design criteria and guidelines of cannabis-related, agricultural development, though AV-1.2, Visual Blending Plan for Cannabis Infrastructure, MM LU-1.1.4, Master Planned Cannabis Facilities, and MM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, would still be required to maintain impacts as less than significant with mitigation.

Impact AV-2: Since the manufacturing component of Alternative 2 would reduce the number of new manufacturing structures associated with home occupation-scale manufacturers via the inclusion of County designated cooperative sites, direct visual impacts from new development associated with these facilities would be reduced compared to the Project and More Permissive Project. Additionally, since zoning and visual regulations would otherwise remain the same between the two Program scenarios and Alternative 2, indirect impacts on scenic vistas, existing visual character, and effects from nighttime lighting and glare would remain less than significant.

Indirect impacts under Alternative 2 could change the existing character of scenic resources in the vicinity of each commercial cannabis site, notably with the implementation of new buildings and related infrastructure, including 120,000-gallon water storage tanks for firefighting, which could be constructed for cultivation and manufacturing operations in areas outside municipal water service districts. These improvements may occur in more remote and visually sensitive areas in the County compared to the Program, would could have more severe visual resource impacts. However, impacts would be similar to both Program scenarios with implementation of AV-1.2, Visual Blending Plan for Cannabis Infrastructure, MM LU-1.1.4, Master Planned Cannabis Facilities, and MM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, which would reduce impacts to less than significant with mitigation.

Secondary Impacts: Alternative 2 would increase the number of eligible licenses and reduce eligible parcel size requirements more than the More Permissive Project, thus further reducing unregulated cultivation. Approximately 75 percent of registrants would be located on eligible parcels and, with licensing, would be required to mitigate impacts, including visual resource effects, while 25 percent may continue as unregulated activities. While this alternative would reduce unregulated cannabis activity, there is no feasible way to eradicate all unregulated cannabis activities in the County. However, because unregulated cannabis cultivation operations are generally difficult to detect and would not significantly degrade scenic resources in publicly visible areas, secondary impacts would remain less than significant.

Agricultural and Timber Resources

Impacts AT-1 and AT-2: Direct impacts under Alternative 2 from cannabis cultivation and manufacturing would be similar to those described in Section 3.2, Agricultural and Timber Resources. Because cannabis is identified as an "agricultural product", outdoor or indoor cultivation would not lead to a conversion of agricultural soils or conflict with existing agricultural zoning or Williamson Act contracts. Further, with more area in the County eligible for cultivation licenses, cannabis activates would not be concentrated in agricultural areas and would reduce the risk of adversely affecting
agricultural operations and food production areas. Similar to both Program scenarios, manufacturing activities would continue to be permitted as an ancillary use to agriculture on other lands, and impacts to agricultural and Williamson Act contract resources would be less than significant.

Indirect impacts to important farmland, agriculturally zoned areas, and Williamson Act contract lands would be less than both Program scenarios, as co-location of licensed activities is permitted, which would have less impacts than that of both Program scenarios. Impacts would remain less than significant.

**Impacts AT-3 and AT-4:** Direct impacts to existing zoning and use of forest land under Alternative 2 from both cultivation and manufacturing would be similar to both Program scenarios, as this alternative would allow cultivation on lands zoned for timber production. For areas of the County with the potential for timber production, but not zoned TP, General Plan Policy 5.12.8 and state regulations would protect timber resource land eligible for TP. Therefore, impacts under this alternative would be similar to the Program and remain less than significant.

Indirect impacts to land zoned for timber uses and those lands used for timber harvesting under Alternative 2 would be similar to both Program scenarios, including siting of manufacturing facilities; though implementation of County Fire Code standards could result in significant loss of forested lands due to required additional site improvements. Implementation of MM AT-4.1a, *Siting Allowance for New Manufacturing Structural Development*, and MM AT-4.1b, *Land Clearing*, would reduce impacts to less than significant with mitigation., which would be similar to the Program.

**Secondary Impacts:** Alternative 2 would increase the number of eligible licenses and decrease eligible parcel size requirements less than the More Permissive Project scenario, thus making it easier to become regulated and decreasing unregulated cultivation compared to both Program scenarios. Licensed cannabis sites would ensure impacts to agricultural and timber resources are less than significant, while unregulated cannabis would have significant and unavoidable effects. Approximately 75 percent of registrants would be located on eligible parcels and, with licensing, would be required to mitigate impacts, including adverse effects to agricultural and timber resources, while 25 percent may continue as unregulated activities. While this alternative would reduce unregulated cannabis activity, there is no feasible way to eradicate all unregulated cannabis activities in the County. Therefore, secondary impacts would be reduced under this alternative compared to both Program scenarios, though impacts to agricultural and timber resources would remain significant and unavoidable, despite implementation of MM AT-1.3a, *Sustained Enforcement Program*, and MM AT-1.3b, *Annual Survey and Monitoring Report*.

**Air Quality**

**Impact AQ-1:** Direct impacts would be similar to those discussed in Section 3.3, *Air Quality*, though incrementally increased in intensity above both Program scenarios. Expanding the eligibility requirements and decreasing setbacks in which cannabis cultivation may occur under Alternative 2 may increase pollutant concentrations and objectionable odors on nearby sensitive receptors. However, distributing cannabis cultivation and manufacturing facilities to areas all over the County would decrease the concentration of cumulative effects of these odors. Taken together, impacts would be similar to the Program. Implementation of MM AG-1.1, *Siting for Odor Abatement*, MM AQ-1.2, *Greenhouse Odors*, MM AQ-1.3, *Prohibit Cannabis Material Burning*, MM AQ-1.4, *Consistency of Pesticide Use Setbacks*, and MM AQ-1.5, *Open Air Extraction Area Setbacks*, would reduce impacts to less than significant with mitigation.
Indirect impacts from odors would be less than both Program scenarios under Alternative 2, co-location would be permitted, reducing the number of permanent residences, and reducing potential new permanent emissions, retaining a less than significant impact.

**Impacts AQ-2 and AQ-3:** Direct and indirect impacts of cannabis cultivation and manufacturing under Alternative 2 would be similar to that of both Program scenarios and remain inconsistent with the MBUAPCD AQMP due to the exceedance of 137 lbs/day of NOx (see Table 3.3-7). Additionally, as the County is in nonattainment-transitional for ozone, nonattainment for PM10, and unclassified for CO, exceedance of NOx also exceeds adopted thresholds. As such, impacts would be similar to the Program. Implementation of MM AQ-2.1, Implement TDM Measures, would reduce impacts, however, direct and indirect impacts would remain significant and unavoidable.

**Secondary Impacts:** Under Alternative 2, secondary impacts related to air emissions and objectionable odors would be reduced under Alternative 2 as approximately 80 percent of registrants would be eligible for licensing and subject to regulations and mitigations to reduce emissions. While this alternative would reduce unregulated cannabis activity, there is no feasible way to eradicate all unregulated cannabis activities in the County. Similar to both Program scenarios, unregulated commercial cannabis cultivation and cannabis product manufacturing under Alternative 2 could expose sensitive receptors to substantial pollutant concentrations and create objectionable odors affecting a substantial number of people, be potentially inconsistent with the MBUAPCD AQMP, and potentially violate an air quality standard or 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. Despite the implementation of MM AT-1.3a, Sustained Enforcement Program, MM AT-1.3b. Annual Survey and Monitoring Report, and MM AQ-1.3. Prohibit Cannabis Material Burning, impacts would remain significant and unavoidable, though less than both Program scenarios.

**Biological Resources**

**Impacts BIO-1 and BIO-2:** Direct impacts under Alternative 2 would consist of the disturbance of vegetation, individual species or populations, habitats or sensitive natural communities, and the disturbance, modification, or destruction of habitat via the cultivation of cannabis canopy. Additionally, direct impacts from manufacturing, structure construction, and operation would have the widest potential impact area because it allows for development in more locations than both Program scenarios. The adverse effects anticipated under this alternative would be similar in nature, though still potentially adverse, such as in the use of chemicals in areas where they could wash into aquatic habitats and adversely affect the survival of individual fish, as discussed in Section 3.8, Hazards and Hazardous Materials. Decreased setbacks of cultivation from adjacent biological resources within zoning districts that have greater amounts of wildlife may reduce the protection of special-status fish species, essential fish habitat, California listed species of special concerns, nesting birds, threatened or endangered individuals and habitat, and special status plants, but would be adequate to protect these resources. With the implementation of MM BIO-1.1a, Special-status Species Habitat Assessment, MM BIO-1.1b, Habitat Compensation, MM BIO-1.1c, Worker Environmental Awareness Program, MM BIO-1.1d, Prevention of Spread of Nonnative Invasive Plants, MM BIO-1.1e, Roosting Bat Survey, MM BIO-1.1f, Nesting Bird Survey, MM BIO-1.1g, Pest Management Plan, MM BIO-1.1h, Water Draw Restrictions, MM BIO-2.1a, Sensitive Communities Habitat Assessment, MM BIO-2.1b, Avoid Oak Woodland, BIO-2.1c, Community Replacement, and MM HYDRO-1.1, Pesticide and Herbicide Control, direct impacts would be similar to both Program scenarios and remain less than significant with mitigation.
Indirect impacts would occur from the development of supporting features that would have less severe impacts than those biological resources described above, due to the allowance for multiple manufacturing licenses on County designated cooperative sites which would reduce the anticipated number of new ancillary manufacturing facilities. Overall, because the extent of the Program area is increased under Alternative 2, associated indirect impacts may incrementally increase in comparison to both Project scenarios, as development could occur in more biologically sensitive areas of the County. However, implementation of MM BIO-1.1a through MM BIO-1.1f, MM BIO-1.1h, MM BIO-2.1a through MM BIO-2.1c, MM HYDRO-2.2, Rainwater Harvesting for Cannabis Cultivation, and MM HYDRO-2.3, Fire Water Tank Supply Management, would ensure indirect impacts are less than significant with mitigation.

Impact BIO-3: Direct impacts under Alternative 2 on the movement of any native resident or migratory species would be greater than both Program scenarios, because of the increased amount of both cultivation and manufacturing that would be permitted on or adjacent to wildlife areas. Impacts from ancillary development such as the enclosure of cultivation sites with a minimum 6-foot high, opaque fence within these areas may restrict the movement of native or migratory species under Alternative 2. With implementation of MM AV-1.1, Fencing Requirements, and MM BIO-3.1, Wildlife Fencing, indirect impacts would remain less than significant with mitigation.

Similar to both Program scenarios, supporting development would be subject to existing plans and policies designed to protect and ensure the movement of native or migratory species throughout the County, and preserve wildlife corridors. Therefore, this impact would remain less than significant.

Impact BIO-4: Direct and indirect impacts under Alternative 2 would remain similar to both Program scenarios on adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources. Actions under Alternative 2 would require adherence to County plans and policies including the Interim Programmatic Habitat Conservation Plan for the Sandhills. With implementation of MM BIO-4.1 Avoidance of Conflict with an Approved HCP, and MM BIO-4.2, No Cannabis Activities Allowed within Sandhills Habitat or SCLTS, direct and indirect impacts would remain less than significant with mitigation.

Secondary Impacts: Secondary impacts of cannabis cultivation and manufacturing under Alternative 2 would be decreased compared to both Program scenarios due to the inclusion of the greatest percentage of cultivators and producers. Approximately 75 percent of registrants would be located on an eligible site that would be subject to the mitigations and regulations of the Program. This would limit the number of people that would resort to illegal activities throughout the County, such as clear-cutting, destruction of sensitive habitats, the introduction of hazardous materials, and unpermitted development activities that prevent the passage of wildlife or divert streams crucial to the life cycle of aquatic or riparian species. Due to the decreased anticipated amount of unlicensed cultivation and manufacturing, secondary impacts would be less than both Program scenarios, though impacts would remain significant and unavoidable despite the implementation of MM AT-1.3a and MM AT-1.3b.

Cultural Resources

Impact CR-1: Under Alternative 2, direct impacts from commercial cannabis cultivation and cannabis product manufacturing could result in physical demolition, destruction, relocation, or alteration of built historical resources. As Alternative 2 would involve a greater area of potential impact than the Project and More Permissive Project, there would be an increased potential for adverse effects upon built historical resources. The potential would be similar to the Program that land clearing and
modifications to existing structures near properties that are known to include significant historical built environment resources, which may have an adverse effect on the physical context for the historic structure and diminish its historic value. Development would be subject to the guidelines and regulations set forth in the General Plan, Chapter 13.10 of the SCCC, Historic Landmark L Combining District, and Chapter 16.42 of the SCCC, Historic Resources Preservation Ordinance. Therefore, impacts would be similar to the Program and MM CR-1.1, Preliminary Historic Assessment of Structures 50 Years Old or More, would remain necessary to reduce the impact of direct impacts of Alternative 2 on built historic resources to less than significant with mitigation.

Indirect impacts under Alternative 2 would remain less than significant and similar to both Program scenarios due to existing requirements for any new development on existing built historical resource properties, which would be subject to the guidelines and regulations set forth in the General Plan, Chapter 13.10 of the SCCC, Historic Landmark L Combining District, and Chapter 16.42 of the SCCC, Historic Resources Preservation Ordinance.

**Impact CR-2:** Alternative 2 would involve licensing of cultivation sites in a greater potential area than the Project or More Permissive Project, which would result in more opportunities for widespread cultivation sites under Alternative 2 and would increase the potential area of disturbance for undiscovered archaeological or paleontological resources. Site preparation and grading activities for new developments could inadvertently uncover archaeological, tribal, or paleontological resources, similar to the Program. Compliance with all County policies, ordinances, and guidelines that protect significant cultural resources would ensure that both direct and indirect impacts of Alternative 2 to archaeological resources, tribal cultural resources, human remains, and paleontological resources would remain less than significant.

**Secondary Impacts:** Due to the inability to predict the location of unregulated cultivation and manufacturing sites and the likelihood that future unregulated commercial cannabis cultivation would result in the damage or demolition of known or potential historic resources, in addition to the potential for more unlicensed cultivation and manufacturing sites, secondary impacts of Alternative 2 would decrease from that of the Project and the More Permissive Project upon built historic resources. Nevertheless, since the locations of all built historic resources in the County are known, with implementation of MM AG-4.3a, Sustained Enforcement Program, and AG-4.3b, Annual Survey and Monitoring Report, appropriate practices can be enforced related to historic resources on these properties. As noted in Section 3.5, Cultural Resources, it is impossible to know where undiscovered sensitive archaeological and paleontological resources exist unless the person who discovers these resources alerts the County. Since unregulated cultivators are unlikely to alert the County if their ground-disturbing activities uncover such resources, adverse impacts would still occur under Alternative 2. Even with implementation of MM AT-1.3a, Sustained Enforcement Program, and MM AT-1.3b, Annual Survey and Monitoring Report, residual secondary impacts to archaeological resources, tribal cultural resources, human remains, or paleontological resources would still occur. Due to an anticipated decrease of unlicensed growers operating under Alternative 2, impacts would decrease in comparison to that of both Program scenarios and would remain significant and unavoidable.

**Geology and Soils**

**Impact GEO-1:** Direct impacts of Alternative 2 on geological stability, including landslides and erosion, would be similar to the Project and More Permissive Project. Potential geologic impacts associated with cultivation activities under the Program would be mitigated by existing County policies and
regulations under the SCCC. With the application of existing regulations, direct Alternative 2 impacts associated with geologic hazards would be considered less than significant.

Under Alternative 2, indirect impacts from utility and residential structure construction would be less than both Program scenarios, as co-location of manufacturing and cultivation would be permitted, which would result in less grading impacts to geologically unstable County lands. Roadway improvement requirements for cannabis-related structures where feasible and appropriate would be addressed via MM LU-1.1.4, Master Planned Cannabis Facilities, and MMM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, therefore, indirect impacts associated with geologic hazards under Alternative 2 would be less than the Program and remain less than significant with mitigation.

Impact GEO-2: Direct impacts from geologic hazards would comparable to both Program scenarios. The geologic impacts would be distributed over a greater area of eligibility in the County and application of existing SCCC regulations would ensure impacts would be less than significant, and reduced compared to both Program scenarios.

Indirect geologic impacts from manufacturing under Alternative 2 would be similar to both Program scenarios; however, licenses in a larger extent of the County would have a greater potential area of impact due to the increase of eligible areas for new manufacturing facilities. However, application of SCCC regulations would ensure impacts would remain less than significant.

Secondary Impacts: Secondary impacts from Alternative 2 could be created through continued unlicensed cannabis cultivation Countywide, even though more potential cannabis cultivators would be included by the Alternative 2 standards and requirements of both Program scenarios. Approximately 75 percent of the registrants would be eligible for cultivation licenses, which would ensure the operations would avoid adverse geologic impacts. Remaining registrants and other unregulated activities would not necessarily comply with existing SCCC regulations that address geologic hazards, such as siting, grading, and erosion control and reduced associated impacts. Secondary impacts related to unlicensed cannabis cultivation and geologic hazards under the Program would remain, but would be less severe than the Program. Operational activities, including volatile extraction processes, may also occur in structures that are not designed to withstand exposure to unstable ground conditions, particularly ground failure during seismic events. Though MM AT-1.3a, Sustained Enforcement Program, and AT-1.3b, Annual Survey and Monitoring Report, would address unlicensed cultivation on an ongoing basis and reduce secondary impacts over the life of Alternative 2, potential adverse impacts to geologic hazards, soils, and minerals would be still occur, though less than both Program scenarios due to increased amounts of regulated activities and decreased amounts of illegal operations. Impacts would remain significant and unavoidable.

**Greenhouse Gas Emissions and Climate Change**

Impact GHG-1: Direct and indirect impacts to GHGs would be similar to both Program scenarios, as direct cannabis activities from Alternative 2 would result in estimated emissions of 13.4 MT CO$_2$e/service population (SP)/year, exceeding the Bay Area Air Quality Management District’s (BAAQMD) recommended GHG threshold of 4.6 MT CO$_2$e/SP/year. Additionally, indirect impacts would remain similar to the More Permissive Project scenario due to the allowance for co-location, and overall less due to the allowance for less intensive grading and ancillary structure construction. However, such options may be offset by increased development given additional licensing opportunities. Implementation of MM LU-1.1.6, Cannabis Best Management Practices, and MM GHG-
1.1, *Alternative Energy Sources*, would reduce the impacts of cannabis cultivation and manufacturing through the increase of energy efficiency and participation in CCA programs, ensuring consistency with the County’s Climate Action Strategy (CAS), and the County’s and state’s goals for GHG reduction. Impacts would therefore be similar to both Program scenarios and *less than significant with mitigation*.

**Secondary Impacts:** Though MM AT-1.3a, *Sustained Enforcement Program*, and AT-1.3b, *Annual Survey and Monitoring Report*, would address unlicensed cultivation on an ongoing basis and reduce secondary impacts over the life of Alternative 2, potential adverse impacts from greenhouse gas emissions would still occur, though less than both Program scenarios due to increased amounts of regulated activities and decreased amounts of illegal operations. Impacts would remain *significant and unavoidable*.

**Hazards and Hazardous Materials**

*Impact HAZ-1:* Under Alternative 2, direct impacts from construction and operation would result from the use, storage, transport, or discharge of potentially hazardous materials. However, commercial cannabis cultivation would be subject to existing laws and regulations governing the cultivation of commercial food products and associated hazardous activities. Therefore, direct impacts would be similar to both Program scenarios and remain *less than significant*.

Indirect impacts from handling or release of hazardous materials during construction and use of residential units and associated roads, driveways and infrastructure, as well as onsite fire water tanks would also be similar to both Program scenarios. Cannabis cultivation could be licensed in more areas of the County, but co-location would help reduce the risk of hazard and hazardous materials in higher risk sites, which would be similar to the Program. The permit review process, review by the Licensing Office, and application of existing federal, state, and local regulations governing the use of hazardous agricultural chemicals and activities would ensure impacts remain *less than significant*.

*Impact HAZ-2:* Direct impacts from commercial cannabis product manufacturing and associated use of hazardous materials would be reduced compared to that of both Program scenarios. Because Alternative 2 allows multiple manufacturing licenses on County designated cooperative sites, unlike both Program scenarios, there is less potential for the construction of new facilities with hazardous uses at every cultivation site that permits the practices. This cooperative site mechanism would also reduce the incentive for potentially hazardous manufacturing practices to be introduced to areas without existing hazardous materials use. Therefore, impacts would be less than both Program scenarios and remain *less than significant*.

Indirect impacts of Alternative 2 from utility and ancillary facility manufacturing activities and their associated hazards would be managed by federal, state, and local regulatory requirements, and this alternative impact would not require mitigation to remain *less than significant*.

*Impact HAZ-3:* Direct impacts from cannabis cultivation and manufacturing located in high fire hazard, wildland areas would be slightly increased compared to both Program scenarios, primarily due to a larger area of eligibility from provisions allowing outdoor cultivation and cultivation on TP and SU zoning districts, along with minimum parcels sizes lessened and no restriction based on the Coastal Zone + 1 mile buffer. Because TP and SU zoning districts contain a large amount of high fire hazard and wildland areas (due to associated timber resources contained within these districts and their associated fire and access hazards), allowing cultivation and manufacturing which these locations would maintain the existing risk associated with exposing people, existing mountain communities,
and structures from wildland fires and interference with emergency evacuations. Nevertheless, compliance with CalFire defensible space requirements, County Building Code, and County Fire Code regulations on other eligible parcels within fire hazard areas within CA, A, M, and C4 zoning districts would ensure protection of proposed facilities from wildfire hazards and impacts would remain less than significant.

Indirect impacts from cannabis cultivation and manufacturing that may be located within high fire hazard areas, exposing people or structures to risks involving wildland fires, would be similar to both the Project and More Permissive Project, notably in the requirement for County Fire Code compliant ancillary structures such as requiring a 120,000-gallon water tank, a 20-foot wide road, and 100 feet of vegetation clearing around the structure that would increase hazards to environments and habitats throughout the County. Alternative 2 requires the Licensing Official to ensure that operations comply with the County Fire Code prior to issuance of a license, therefore impacts are considered less than significant and similar to both Program scenarios.

Secondary Impacts: Secondary impacts under Alternative 2 on the use, transport and disposal of hazardous materials would be less than that of the Project and More Permissive Project due to the lower number of unlicensed cannabis cultivators that would cultivate and manufacture unregulated. In contrast to the 56 percent and 64 percent of registrants included under the Project and More Permissive Project respectively, the Most Permissive Alternative would include approximately 75 percent of Program registrants under Alternative 2, enabling regulation of a greater number of operators. In addition, encouraging cultivator access to the use of manufacturing facilities would temper the need for manufacturers to operate illegal and dangerous alternatives (i.e., unsafe forms of BHO extraction labs, etc.). With the lack of enforcement and regulations of unregulated operations, there is a greater chance that these sites would not comply with policies or regulations designed to reduce fire hazards, especially those concentrated in the mountains and forested regions of the County. With implementation of MM AT-1.3a, Sustained Enforcement Program, and AT-1.3b, Annual Survey and Monitoring Report, to implement surveying and sustainable enforcement mitigations, secondary impacts would be reduced over the life of the Program and impacts would be less than both Program scenarios; however, impacts would remain significant and unavoidable.

Hydrology and Water Resources

Impact HYDRO-1: Direct impacts from commercial cannabis cultivation under Alternative 2 on the introduction of sediment and other pollutants to surface flows and groundwater, and on groundwater supplies and groundwater recharge, would be less than both Program scenarios. Alternative 2 would continue to only allow licensed cannabis cultivation in accordance with existing water quality regulations, and application of surface runoff requirements, hazardous material control, and use of pesticides, herbicides, and rodenticides would require adherence to existing regulations. Similar to both Program scenarios, the potential for the use of pesticides and rodenticides and its potential for water and groundwater contamination would remain, and MM HYDRO-1.1, Pesticide and Herbicide Control, MM HYDRO-1.2, Cleanup and Restoration Plan for Relocated Cultivation Sites, and MM HYDRO-1.3, Sanitary Sewer Survey, would remain necessary, resulting in direct impacts less than significant with mitigation.

Indirect impacts would be less than both Program scenarios. Similar to Impact HYDRO-1 above, existing regulations would protect water quality from residential unit development and associated site improvements, which would not result in a significant potential to introduce sediment and pollutants to receiving water bodies. For instance, allowing co-location instead of requiring
permanent residential structures for each license would result in fewer impacts on hydrologic systems. For other ancillary structures, integration of MM LU-1.1.4, Master Planned Cannabis Facilities, and MM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, would ensure impacts remain less than significant with mitigation.

Impact HYDRO-2: Direct impacts to groundwater supplies and groundwater recharge would be similar to both Program scenarios. Similar to both Program scenarios, the total amount of proposed canopy is nominal and would only incrementally affect groundwater resources. With implementation of MM HYDRO-2.1, Water Efficiency for Cannabis Cultivation, and MM HYDRO-2.2, Rainwater Harvesting for Cannabis Cultivation, impacts would be less than significant with mitigation and be comparable to both Program scenarios.

Indirect impacts to groundwater supplies and groundwater recharge would be similar to both Program scenarios. Under Alternative 2, required ancillary facilities would include 120,000-gallon water tanks for nearly all sites proposing cannabis cultivation, storage, or processing. Implementation of MM HYDRO-2.3, Water Tank Supply Management, would ensure impacts are similar to both Program scenarios and less than significant with mitigation.

Impact HYDRO-3: Direct and indirect impacts of commercial cannabis cultivation under Alternative 2 on existing drainage patterns, including the alteration of the course of streams or rivers and the potential to place people or structures in areas of inundation or mudflows, including 100-year floodplains, would be slightly greater than both Program scenarios due to the increased total area of potential impact under this alternative. Due to the limitations of building within floodplains and adherence to the County’s Grading and Erosion Control Ordinances (Chapters 16.20, 16.22, and 7.79 of the SCCC), direct and indirect impacts would be reduced. Additionally, with application of existing regulations to maintain drainage patterns and hydraulic capacity, impacts to drainage patterns would remain less than significant.

Impact HYDRO-4 and HYDRO-5: Direct, indirect, and secondary impacts under Alternative 2 from the introduction of sediment and other pollutants to surface flows and groundwater, and on the groundwater supplies and groundwater recharge, in addition to existing drainage patterns, including the alteration of the course of a stream or river and the potential to place people or structures in areas of inundation or mudflows or 100-year floodplains from commercial cannabis manufacturing would be similar to both Program scenarios with application of existing regulations and remain less than significant.

Secondary Impacts: Secondary impacts would be less than both Program scenarios due to a reduced anticipated amount of unlicensed cannabis cultivation development and associated unpermitted grading and development practices that may interfere with groundwater infiltration and introduce sediments and pollutants to receiving water bodies. Additionally, a reduced number of unlicensed cannabis cultivators would result in unpermitted discharges of fill material to water courses, diversions of streams, and obstructed drainage patterns with inclusion to the Most Permissive Alternative. County enforcement data demonstrates that poorly operated unlicensed grow operations in watersheds have erosion and sedimentation impacts on receiving waters. Despite the implementation of MM AT-1.3a, Sustained Enforcement Program, and AT-1.3b, Annual Survey and Monitoring Report, impacts would remain significant and unavoidable, though less than both Program scenarios.
Land Use and Planning

Impact LU-1: Direct and indirect impacts to land use and planning policy consistency would be similar to both the Project and More Permissive Project scenarios. Similar to the Program scenarios, Alternative 2 would create land use conflicts associated with required installation of an opaque fence, requiring large water storage tanks with related site pad clearing and grading, 20-foot wide roads, and 100-foot radius vegetation clearing, and unclear eligibility of cannabis cultivation and/or manufacturing in SU zoned parcels. However, this alternative does not exclude potentially eligible land within the Coastal Zone + 1-Mile buffer, which could provide additional sites with fewer constraints. Implementation of MM BIO-3.2, Wildlife Fencing, MM LU-1.1.3, USL + RSL Allowances, MM LU-1.1.4, Master Planned Cannabis Facilities, and MM LU-1.1.5, Avoid Excessive Grading and Disturbance Associated with Commercial, Industrial, and Manufacturing Cannabis Activities, and MM LU-1.1.6, Cannabis Best Management Practices, would ensure land use impacts are similar to the Program and are less than significant with mitigation.

Impact LU-2: Direct and indirect impacts could occur under Alternative 2 from cannabis cultivation and manufacturing in existing communities due to traffic, odors, noise, or other quality of life issues. Unlike both Program scenarios, manufacturing would be able to consolidate to a cooperative site. With this implementation, there would be a reduced need for numerous independent manufacturing facilities with the potential of changing the character of a community. Using cooperative sites could condense cannabis manufacturing to a denser area footprint, reducing potential neighborhood compatibility issues or perceived change in quality of life. Additionally, spreading out cannabis cultivation and manufacturing facilities throughout the County would likewise distribute the associated amounts of traffic, odor, and noise that may emanate from cannabis operations. Given the indoor requirement for cannabis manufacturing, such activities would be shielded from public view. Similarly, cannabis home occupations limit use to the indoors, prohibit employees and distribution at the site (the owner applicant must deliver cannabis to a registered dispensary or testing facility), and limits the size and scale of activities. These requirements minimize and eliminate potential adverse effects on the surrounding neighborhood, and direct and indirect impacts to existing communities would be similar to the Program and would remain less than significant.

Secondary Impacts: Impacts to land use and planning policy consistency under Alternative 2 would result from land use conflicts related to unregulated cannabis cultivation and manufacturing activities, as unregulated cultivators and manufacturers would likely continue to operate illegally, or would not be able to obtain a license. Approximately 75 percent of registrants are located on eligible sites, which would minimize the need for site relocation and maximize onsite impact mitigation. Unregulated cannabis activities would persist, but at lower levels than the Program. Impacts to neighborhood compatibility and plan inconsistency would result from land use conflicts related to unregulated cannabis cultivation and manufacturing activities within or adjacent to existing communities, especially in areas of the County known for cultivation such as the Mountain and North Coast Regions. Alternative 2 would allow additional registration opportunities to become legally licensed, and unregulated cannabis cultivators and manufacturers would be offered future opportunities to comply with land use and zoning. With the implementation of MM AT-1.3a, Sustainable Enforcement Program, and MM AT-1.3b, Annual Survey and Monitoring Report, the quantity of illegal operators may be reduced over time, and while the practice would still occur, future opportunities would be available for compliance. Impacts would be less than both Program scenarios and remain less than significant with mitigation.
Public Services

Impacts PS-1 and PS-2: Direct and indirect impacts from cannabis cultivation and manufacturing under Alternative 2 would increase demand for fire protection, police protection, public schools, parks, libraries, and other public facilities, similar to both Program scenarios.

Fire Protection: Because Alternative 2 allows cultivation and manufacturing areas within TP areas of the County, there would be the potential for population increases in high fire risk zones. While implementation of this alternative could potentially cause the number of people and cannabis sites in the high fire risk zones to increase due to the eligibility of parcels in these zones for cannabis activities and requirements for a residential unit and ancillary facilities, licensees must comply with Fire Protection Policies 7.16.1 and 7.16.2 to ensure emergency access, evacuation routes, and appropriate structural development. With compliance with fire safety inspections for new residences, building inspections, fire code investigations, and code compliance, overall risk of fire would be reduced and direct and indirect impacts would be less than significant, though greater than both Program scenarios due to the increased allowance for more uses in high fire hazard areas of the County.

Police Protection: Impacts would be similar to both Program scenarios, with increased levels of employment, employee population, and police staffing levels. Impacts would remain less than significant.

Parks, Schools, Libraries and Other Public Services: As under both Program scenarios, Alternative 2 would potentially generate an estimated 1,737 additional full-time cultivation employees, with seasonal increases up to 2,123 employees for cultivation and manufacturing activities, and approximately 1,200 additional full-time manufacturing employees over the next 10 years, which would contribute to increased demand for housing, as well as the use of parks, schools, libraries, and other public services by the employees’ families for up to 5,060 employees. In addition, Alternative 2 allows successive registration processes for additional cultivation licenses, which may increase the number of employees. As discussed in Section 3.11, Public Services, this population increase would not represent a substantial change or significant inducement of population growth for these public services, since the population growth would happen over time and throughout the County. Ultimately, impacts would remain less than significant and similar to both Program scenarios.

Secondary Impacts: Unregulated cannabis manufacturing activities under Alternative 2, 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 manufacturing may occur in remote areas such as in the North Coast and Mountain regions, lacking adequate emergency access routes and further increasing response times. Given that unlicensed cannabis cultivation would be less than both Program scenarios, though would still not comply with existing SCC regulations that address public service adequacy including acceptable emergency access, impacts would remain potentially significant. Despite the implementation of MM AT-1.3a, Sustained Enforcement Program, and MM AT-1.3b, Annual Survey and Recording, which would address unlicensed cultivation on an ongoing basis, impacts related to public services under this alternative would be significant and unavoidable, though less than both Program scenarios.

Population, Employment, and Housing

Impact POP-1: As under both Program scenarios, direct impacts of Alternative 2 would result in an increase in full-time cultivation employees Countywide. While the increase in housing demand from
cannabis industry employees may be substantial, the County maintains programs and policies to ensure adequate provision of housing to meet ongoing demands, particularly when the demand is generated from local industries, including Measure J and the Housing Element. With implementation of MM POP-1.1, *Affordable Housing Fee for Agricultural Buildings Used for Commercial Cannabis*, impacts would be similar to both Program scenarios and remain *less than significant with mitigation*.

Indirect impacts under Alternative 2 on population and housing would result in the construction of new housing units on some cannabis cultivation sites throughout the eligible areas of the County. Given the geographic limitations of Alternative 2, residential development would occur in many communities of the County where cannabis activities have the potential to lead to growth inducement, as further discussed in Section 3.15, *Other CEQA Issues*. Therefore, indirect impacts to population and housing under Alternative 2 would be considered similar to both Program scenarios and remain *less than significant*.

**Secondary Impacts:** Under Alternative 2, only 25 percent of registrants would be excluded from licensing opportunities. Impacts from unlicensed cultivation may include additional employees seeking housing within the County, as well as unpermitted residential development to house employees. Unlicensed cultivation could occur in any of the Countywide regions and could continue or expand in areas unsuitable for cultivation or development of appropriately permitted housing. 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 or reduction in property values due to proximity of unsafe and unpermitted construction. With implementation of MM AT-1.3a, *Sustained Enforcement Program*, and MM AT-1.3b, *Annual Survey and Monitoring Report*, to address unlicensed cultivation on an ongoing basis, impacts would be reduced over the life of the Program. Impacts would be less than both Program scenarios, and impacts would remain *significant and unavoidable*.

**Transportation and Traffic**

*Impact TRA-1:* Direct impacts from cultivation and manufacturing on transportation and traffic under Alternative 2 would be similar than both Program scenarios. Similar to the Program scenarios, an increase in vehicle trips and VMT would be distributed across the County. This alternative would allow the most expansive range of eligible sites, thus potentially distributing traffic impacts over a larger area and incrementally reducing acute impacts on intersections and roadways. While implementation of MM TRA-1.1, *Payment Transportation Impact Fees*, would reduce adverse effects, implementation of this mitigation measure could not feasible ensure the reduction of impacts to a less than significant level. As such, due to the potential for greater generation of traffic and vehicle trips, impacts are considered similar than both Program scenarios and remain *significant and unavoidable*.

Indirect impacts would be similar to those detailed above, as residential units and site improvements would be developed on cannabis related sites throughout the area of eligibility under this alternative. Indirect impacts under this alternative would be similar than under both Program scenarios, but would remain *significant and unavoidable*.

*Impact TRA-2:* Direct and indirect impacts of commercial cannabis cultivation under Alternative 2 could result in traffic safety hazards, inadequate emergency access, or impacts to road maintenance that is less than both Program scenarios. Similar to both Program scenarios, eligible areas under this alternative would largely occur in rural areas with hazardous roadways, and many cultivation sites within mountainous, unmaintained roads. The potential exists for hazardous safety issues on rural
roads for both operation vehicles and personal vehicles, and implementation of MM TRA-2.1, *Rural Road Management*, and MM TRA-2.2, *Adequate Access Roadway Design*, would ensure impacts are similar to the Program and would remain *less than significant with mitigation*.

**Impact TRA-3:** Similar to both Program scenarios, direct and indirect impacts of manufacturing under Alternative 2 would be primarily located in urban areas of the County, accessed by urban road systems that support adequate emergency access and potential traffic hazards. Those operations that generate traffic from employees and operations 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. While the direct traffic effects of unlicensed cannabis cultivation/manufacturing cannot be determined, it is anticipated that ongoing operation of unlicensed operations under this alternative would continue; however, secondary impacts would be less than both Program scenarios. Adverse impacts to transportation and traffic would remain *significant and unavoidable*, despite implementation of MM AT-1.3a, *Sustained Enforcement Program*, and MM AT-1.3b, *Annual Survey and Monitoring Report*.

**Utilities and Energy Conservation**

**Impact UE-1:** Direct and indirect impacts of cultivation and manufacturing on water, wastewater, and solid waste services within the County would be similar in nature to both Program scenarios. The total area of canopy, water use, wastewater, and solid waste is consistent between Alternative 2 and both Program scenarios, resulting in similar impacts to the existing utility services available. Therefore, impacts on water supply and existing infrastructure would remain *less than significant*, impacts on wastewater services would remain *less than significant*, and with implementation of MM AQ-1.3, *Prohibit Cannabis Material Burning*, MM LU-1.1.6, *Cannabis Best Management Practices*, MM HYDRO-1.2, *Sanitary Sewer Survey*, MM HYDRO-2.1, *Water Efficiency for Cannabis Cultivation*, MM HYDRO-2.3, *Water Tank Supply Management* and MM UE-1.1, *Cannabis Soil, Plant Material, and Waste Management* would ensure impacts to solid waste are *less than significant with mitigation*.

**Impact UE-2:** Direct impacts of cultivation and manufacturing under Alternative 2 would result in additional demand for energy resources within the County and may conflict with energy conservation policies and objectives, and would be less impactful than both Program scenarios. Impacts would be similar to both Program scenarios, and implementation of MM LU-1.1.6. *Cannabis Best Management Practices*, and MM GHG-1.1. *Alternative Energy Sources*, would ensure impacts would be similar to the Program and remain *less than significant with mitigation*.

Indirect impacts would be similar to the Program. Due to compliance with the California Building Code and County policies relating to energy conservation features, this alternative would not conflict with existing energy conservation standards and indirect impacts would remain *less than significant*.

**Secondary Impacts:** Under Alternative 2, a reduced number of unlicensed cannabis cultivators and manufacturers would occur compared to both Program scenarios, which would result in fewer adverse impacts to water, wastewater, and solid waste services or infrastructure. Illegal operations would occur without SCCC or policy compliance, and could include unregulated groundwater or
surface water diversion, improper disposal and treatment of wastewater generated onsite, or the improper storage, handling, and disposal of municipal solid waste, as well as cannabis plant waste products and energy consumption. Alternative 2 would result in a reduced number of unlicensed cultivators compared to both Program scenarios, and despite implementation of MM AT-1.3a, Sustained Enforcement Program, and MM AT-1.3b, Annual Survey and Recording, adverse impacts to utilities and energy conservation would be less than the Program and remain significant and unavoidable.

**Conclusion and Relationship to Project Objectives**

Alternative 2 would not reduce any significant impacts to a less than significant level; however, this alternative would result in substantial reductions of resource and service secondary impacts given the substantial and historically unlicensed cannabis activities occurring in the County. This alternative may result in similar direct and indirect adverse environmental impacts to agricultural and timber resources, biological resources, cultural resources, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use, public services, population, employment, and housing, and transportation and circulation. Operators that currently conduct unregulated activities in these areas would be given the opportunity to comply with regulations designed to protect natural resources. Direct and indirect impacts to air quality, geology and soils, and utilities and energy conservation would be less adverse compared to both Program scenarios, with more widespread, less intensive impacts distributed throughout the County. The secondary impacts of this alternative would be reduced, compared to having limited oversight of unregulated activities. While adverse impacts would still occur under this alternative, the alternative’s flexibility would enable adaptive management of cultivation and manufacturing operations within the County. The classification of all impacts under Alternative 2 would be the same as those under the Program, including significant and unavoidable air quality and transportation impacts.

Adoption of Alternative 2 would achieve the Program objectives which include, regulating commercial cannabis cultivation and manufacturing in a manner consistent with state law, developing a program that encourages cannabis cultivators and manufacturers to operate legally and secure operating licenses in compliance with County regulations, preventing adverse impacts on sensitive populations, natural resources and wildlife, riparian corridors, wetlands, and water supply, and developing a legal, local cannabis industry to improve the County’s tax base. This alternative would also provide an efficient and clear cultivation and manufacturing permit process and regulations, and would regulate sites and premises to avoid degradation of the visual setting and neighborhood character, odors, hazardous materials, and fire hazards. With mitigations, this alternative would ensure adequate law enforcement and fire protection response, promote energy and resource efficiency, and provide efficiency and clarity in the permit process to facilitate participation and use by applicants.

**4.3 Environmentally Superior Alternative**

Each alternative analyzed in this section 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 and relatively greatest benefits is thereby considered the Environmentally Superior Alternative.

All alternatives would result in significant impacts to air quality and transportation and circulation, and none of the alternatives analyzed would reduce this significant impact to a less than significant
level. The Project, More Permissive Project, Alternative 1, and Alternative 2 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. Alternative 1 is also eliminated from consideration for the Environmentally Superior Alternative as it does not meet a vast majority of Project objectives.

Based on the information in this EIR, the Most Permissive Project Alternative is identified as the Environmentally Superior Alternative. Alternative 2 was found to generate the least adverse impacts, with the potential to substantially improve natural resources and public service conditions associated with secondary impacts, while achieving the most Program objectives. The Most Permissive Project Alternative would give the County the most flexibility and opportunity to bring cannabis operations into compliance with the SCCC and the County General Plan and monitor operations over time. It also provides the greatest opportunity to mitigate impacts and increase County tax revenue to support ongoing improvement and enforcement programs. With implementation of mitigation measures, the Most Permissive Project Alternative provides a balance between meeting Program objectives, including quality of life concerns, while addressing environmental impacts by maximizing participation in the Program and, in doing so, applying SCCC regulations, County policies, and required mitigation measures from this EIR to all licensed cannabis cultivation and manufacturing. The Most Permissive Alternative minimizes the barriers to participation in the Program and would reduce secondary effects, which are consistently the more severe and environmentally damaging significant and unavoidable impacts identified by the analysis.

Given the nature of unregulated cannabis activities that current existing and may occur 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 inability to effectively enforce and regulate such unlicensed operations. Due to the potential for operators to continue to engage in such activities within the County, either due to costs of licensing, associated costs of development, or other reasons, significant and unavoidable secondary impacts are considered to continue to occur, regardless Program scenario (see Table 4-6). However, the Most Permissive Project Alternative would reduce these impacts to the greatest degree compared to all other Program scenarios and alternatives considered.
### Table 4-5  Comparison of Direct and Indirect Impacts of the Program Alternatives

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<tbody>
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<td>Less than Significant with Mitigation</td>
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<td>Significantly more adverse (Significant and Unavoidable)</td>
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<tr>
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<td>Meet Project Objectives?</td>
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### Table 4-6 Comparison of Secondary Impacts of Unregulated Cannabis Activities of the Program Alternatives

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