

EXECUTIVE SUMMARY

INTRODUCTION

This summary is provided in accordance with the California Environmental Quality Act (CEQA) Guidelines (State CEQA Guidelines) (California Code of Regulations [CCR] Section 15123). As stated in the State CEQA Guidelines (CCR Section 15123[a]), “[a]n EIR [environmental impact report] shall contain a brief summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical.” As required by the State CEQA Guidelines, this section includes (1) a summary description of the proposed project; (2) a synopsis of environmental impacts and recommended mitigation measures; (3) identification of the alternatives evaluated and of the environmentally superior alternative; (4) a discussion of the areas of controversy associated with the project; and (5) issues to be resolved, including the choice among alternatives.

SUMMARY DESCRIPTION OF THE PROJECT

Location

Yolo County is located in the northern part of the Central Valley of California and is bounded by Sacramento, Sutter, Colusa, Lake, Napa, and Solano Counties. The County consists of approximately 653,550 acres, which includes four incorporated cities totaling approximately 32,300 acres. The four incorporated cities are Davis, West Sacramento, Winters, and Woodland. In addition to the incorporated cities, land owned by state and federal agencies, tribal trust land held on behalf of the Yocha Dehe Wintun Nation, and the University of California, Davis, campus have independent land use decision-making authority and are generally not under the jurisdiction of Yolo County. There are 11 unincorporated towns in the County: Capay, Guinda, Rumsey, Clarksburg, Dunnigan, Esparto, Knights Landing, Madison, Monument Hills, Yolo, and Zamora. These unincorporated towns are under the jurisdiction of the County. Aside from the small unincorporated communities, the unincorporated area of the County is generally rural and composed primarily of agricultural land uses.

Existing Yolo County Cannabis Regulations

On March 22, 2016, in response to the Medical Marijuana Regulation and Safety Act and to effect greater local control, the Yolo County Board of Supervisors (Board) adopted Ordinance Number 1467 adding Chapter 20 to Title 5 of the Yolo County Code regulating medical cannabis cultivation in Yolo County. The Board structured this ordinance as an interim measure to limit harmful environmental impacts while protecting patient access to medical cannabis. This “interim ordinance” would be in effect while state and County staff developed more comprehensive regulatory programs. The interim ordinance, since renamed the Marijuana Cultivation Ordinance, has been amended several times since it was first enacted. For a description of those amendments please see Section 2.3.3 of Chapter 2.0, “Description of Preferred Alternative and Equal Weight Alternatives.” There are 78 operations in the County authorized for commercial cannabis cultivation under the Interim Ordinance.

Proposed Cannabis Land Use Ordinance

The Yolo County–proposed Cannabis Land Use Ordinance (CLUO) would add Article 14 to Title 8, Chapter 2, of the Zoning Regulations within the Yolo County Code. It would regulate all cannabis operations within the unincorporated area of the County. Specific land use requirements and development performance standards are included in the CLUO that address, among many topics, a range of social and environmental issues. The Revised Public Review Draft CLUO is provided in Appendix C.

The discussion below summarizes the Revised Public Review Draft CLUO. These standards, except when noted, would apply to all the alternatives included in this EIR. Table 2-5 in Chapter 2 identifies what cannabis uses are allowed in the County’s zoning districts.

Section 8-2.1401, Relationship to Other County Cannabis Regulations: This section identifies other Yolo County Code sections that contain regulations specific to cannabis activities.

Section 8-2.1402, Purpose: This section elaborates on the purpose of the regulations. It establishes County intent in implementing the code. It describes the primary policy concerns and how they are to be balanced.

Section 8-2.1403, Definitions: This section provides definitions for various terms. Work on this section is ongoing. The definitions are guided by, and intended to be consistent with, the draft ordinance and would therefore result in no change to the environmental impact analysis presented herein. Unless otherwise defined, the County accepts the state definitions of various terms related to cannabis and cannabis activities.

Section 8-2.1404, Applicability: This section addresses various aspects of how the CLUO will be applied and provides compliance timeframes for the 78 existing and eligible licensees under the County’s existing cannabis program. On June 26, 2018, the Board of Supervisors directed staff to integrate adult use (nonmedical or recreational) into the current and proposed cannabis regulations. Therefore, the assumptions regarding medical-only as compared to adult use that were originally to be explored through the alternatives (Section 8-2.1404[H]) are no longer relevant. Yolo County no longer prohibits adult cannabis use.

Section 8-2.1405, Cannabis Use Categories and Use Types: This section identifies each of the state license use types and categorizes them for purposes of the draft CLUO. Generally, the use types are as defined in state law. Section 8-2.1405 (A through E), related to various cannabis use categories and use types, will be modified in the different EIR alternatives. Alternative 1 assumes cultivation only, with ancillary nurseries and processing allowed. Alternatives 2 and 3 assume all use types (except special events). Alternative 4 assumes outdoor uses are prohibited. Alternative 5 assumes the same use types as Alternatives 2 and 3 restricted to agricultural zones and with the exclusion of retail.

Section 8-2.1406, Cannabis Permit Requirements: This section clarifies the various license and permit requirements. Among other things, it authorizes an administrative process for placing limits on the number of license and permits issued. It also establishes controls on overconcentration. In general, a cannabis operation must have the appropriate state cannabis license(s), a County cannabis license, a County business license (this requirement does not apply to cultivators, nurseries, or processing-only license holders), and a County cannabis use permit. The number of state licenses an individual or business can hold is dictated by state law. The number of separate County cannabis licenses and use permits a person or business can hold may be established in future administrative procedures to be adopted by the County. If such limits are enacted later, they would serve to further minimize environmental impacts identified in this EIR.

Section 8-2.1406(h) addresses possible future regulation of the number of cannabis activities within a geographic area of the County to address concerns of overconcentration. This subsection establishes that the County may choose to enact such controls at any time, identifies the use of the comment areas of the County’s citizen advisory committees as possible subregions for such regulation, identifies the use of population and density as possible considerations, and establishes that effects on the illegal market should be among the factors considered when making decisions regarding specific cannabis use permit

applications. Whether and how overconcentration will be regulated has yet to be decided. CEQA Alternatives 2, 3, and 4 assume controls for overconcentration, but as noted the specific mechanism and procedure for that to occur has not been developed. Chapter 4, “Cumulative Impacts and Overconcentration,” contains an analysis of overconcentration and includes mitigation to address identified effects from concentrations or clusters of cannabis uses in particular geographic areas.

For the purposes of this EIR, the maximum numbers of assumed cannabis/operations by type are as defined for each alternative. Alternative 1 assumes 78 cannabis uses, Alternatives 2 and 4 assume up to 132 cannabis uses, Alternative 3 assumes 264 cannabis uses, and Alternative 5 assumes 130 cannabis uses.

This section also identifies findings for approval and denial of Cannabis Use Permits. These findings are based generally on County use permit findings identified in Section 8-2.217 (Use Permits) of the current County Zoning Regulations. These findings require consistency with the contents and requirements of the ordinance under review in this EIR and will have no potential to result in new or different impacts.

Section 8-2.1407. Table of Cannabis Development Requirements: This section identifies in table format which use types are allowed in which zone districts, as well as other applicable development requirements, such as maximum canopy area and buffers from sensitive uses. In the final approved CLUO, this table will be modified to reflect the alternative approved by the Board of Supervisors including allowed use types and allowed zones. Alternative 1 assumes a 75-foot buffer between outdoor cannabis uses and individual residences and a 1,000-foot buffer between outdoor cannabis uses and identified sensitive uses. Alternatives 2 and 5 assume a 1,000-foot buffer between outdoor cannabis uses and individual residences and identified special uses. Alternative 3 assumes a 75-foot buffer between outdoor cannabis uses and individual residences and identified special uses. Alternative 4 assumes no buffers as outdoor cannabis uses are not allowed. As described in the table, these buffers do not apply to indoor and mixed light operations.

Section 8-2.1408. Specific Use Requirements and Performance Standards: This section provides specific requirements and performance standards to regulate operations for all cannabis use types. A summary of items under this section is included in Chapter 2, “Description of the Preferred Alternative and Equal Weight Alternatives.”

Section 8-2.1409. Special Cannabis Restrictions and Concerns: This section identifies and discloses restrictions and concerns unique to cannabis, including the current federal framework, the potential for changes in the regulatory environment at all levels, and limitations on County liability.

Section 8-2.1410. Application Submittal and Processing: This section identifies information required for the cannabis use permit application specific to the proposed site and operation. It establishes general code compliance requirements and identifies use permit requirements specific to cannabis applications. It also discloses the intent to achieve project-specific CEQA coverage from the programmatic EIR by utilizing available CEQA streamlining opportunities.

Section 8-2.1411. Reporting and Inspections: This section identifies annual reporting and inspection requirements, and describes how that information will be presented to the Planning Commission and Board of Supervisors.

Section 8-2.1412. Enforcement: This section describes the enforcement process and related topics, including abatement, penalties, procedures for suspension and/or revocation, enforcement, and other matters. This subsection identifies procedures for suspension or revocation of Cannabis Use Permits. Additional text describing the enforcement process may be considered by the County later in the review process. If it is considered, it would serve solely to clarify the enforcement process and would not result in changes to the EIR analysis.

Section 8-2.1413. Effectiveness. This section identifies a required evaluation of the effectiveness of the ordinance after 2 years of implementation.

Because the Yolo County 2030 Countywide General Plan, adopted in 2009, did not anticipate cannabis as a legal commercial crop, the project includes amendments to the County General Plan to establish a policy base for cannabis land use regulation.

PROJECT OBJECTIVES

The primary objectives of the CLUO are identified in Section 8-2.1402 of the Draft CLUO as follows:

- A. Protect the public health, safety, and welfare.
- B. Protect environmental resources and minimize environmental impact.
- C. Ensure neighborhood compatibility.
- D. Ensure safe access to medical cannabis for patients.
- E. Support agricultural economic development including recognition of valuable new crops, preservation of agricultural land, and creation of opportunities for new farmers.
- F. Recognize cannabis as an agricultural crop with unique challenges including Federal classification, legal history, crop value, transaction security, distinct odor, and energy and water requirements.
- G. Recognize competing and evolving community values and interests related to the cannabis industry.
- H. Avoid establishing undesirable precedents for other agricultural sectors.
- I. Avoid unintended consequences including unforeseen community impacts and over-regulation that drives cannabis activities underground.
- J. Allow for adaptation to changing market, cultural, and regulatory considerations over time.
- K. Acknowledge the will of the voters in passing Proposition 64, Marijuana Legalization, in 2016.

EQUAL WEIGHT CANNABIS LAND USE ORDINANCE ALTERNATIVES

The County has identified five alternative variations to the CLUO for review in this document, recognizing that the final CLUO may combine elements of more than one alternative. Each alternative reviewed in this document relies on the same underlying framework that would regulate cannabis activities through land use, zoning, and development standards. The alternatives vary by the assumed type of cannabis license/activity, limits on the number of operations, and performance standards. The County has identified Alternative 1 as the CEQA preferred alternative. These five alternatives are evaluated at an equal level of detail and are summarized below.

Alternative 1: Cultivation (Ancillary Nurseries and Processing Only) with Existing Limits (Existing Operations with CLUO) (CEQA Preferred Alternative)

Alternative 1 assumes that existing personal use and commercial cannabis cultivation (including on-site nurseries and processing that provide support to the cultivation operation) would continue to operate but under the requirements of the new CLUO, in addition to the existing County licensing ordinance, rather than solely under the provisions of the existing licensing ordinance. There are currently 78 existing and eligible cultivators in the County. This alternative assumes 78 cannabis operations countywide plus unlimited cultivation for personal use conducted in accordance with applicable state and local (County) laws:

- personal: unlimited
- cultivation: 78 operations

This alternative includes 75-foot buffers between outdoor cannabis uses and occupied off-site residences, and 1,000-foot buffers between outdoor cannabis uses and the following uses: residentially designated lands, licensed day cares, public parks, recognized places of worship, public or licensed private schools, licensed treatment facilities for drugs or alcohol, federal lands held in trust or proposed before CLUO adoption to be taken into trust for a federally recognized tribe, and licensed youth centers. Personal outdoor grows would be required to meet the above buffering requirements with the exception of the 1,000-foot buffer from residentially designated lands, as this would have the unintended effect of prohibiting such use entirely. Under this Alternative, implementation of the CLUO could result in relocation of nine existing and eligible cultivation sites to meet the assumed buffering and zoning requirements.

Alternative 2: All License Types with Moderate Limits

Alternative 2 assumes that all types of cannabis uses would be allowed, including commercial cultivation, nurseries, processing, manufacturing, testing, distribution, retail, and microbusinesses. As defined, implementation of this alternative would result in 132 cannabis operations countywide plus unlimited cultivation for personal use conducted in accordance with applicable state and local (County) laws:

- personal: unlimited
- cultivation: 80 (includes 78 operations from Alternative 1)
- nurseries: 5
- processing: 5
- manufacturing: 20
- testing: 5
- distribution: 10
- retail: 2
- microbusiness: 5

Alternative 2 includes the ability of the County to establish by resolution limits on the number of cannabis operations to avoid the overconcentration of such uses in distinct subregions, for example, within the defined comment areas of the County's citizen's advisory committees (see Section 8-2.1406(H) of the proposed CLUO). This alternative also includes 1,000-foot buffers between outdoor cannabis uses and occupied off-site residences and residentially designated land, licensed day cares, public parks, recognized places of worship, public or licensed private schools, licensed treatment facilities for drugs or alcohol, federal lands held in trust or proposed before CLUO adoption to be taken into trust for a federally recognized tribe, and licensed youth centers. Personal outdoor grows would be required to meet the above buffering requirements with the exception of the 1,000-foot buffer from residentially designated lands, as this would have the unintended effect of prohibiting such use entirely. Under this Alternative, implementation of the CLUO would require relocation of 30 existing and eligible cultivation sites to meet the assumed buffering and zoning requirements.

Alternative 3: All License Types with High Limits

Alternative 3 assumes that all types of cannabis uses would be allowed, including commercial cultivation, nurseries, processing, manufacturing, testing, distribution, retail, and microbusiness. As defined, implementation of this alternative would result in 264 cannabis operations countywide plus unlimited cultivation for personal use conducted in accordance with applicable state and local (County) laws:

- personal: unlimited
- cultivation: 160 (includes 78 operations from Alternative 1)
- nurseries: 10
- processing: 10
- manufacturing: 4
- testing: 10
- distribution: 20
- retail: 4
- microbusiness: 100

Alternative 3 includes the ability of the County to establish by resolution limits on the number of cannabis operations to avoid the overconcentration of such uses in distinct subregions for example within the defined comment areas of the County's citizen's advisory committees (see Section 8-2.1406(H) of the proposed CLUO). This alternative also includes 75-foot buffers between outdoor cannabis uses and occupied off-site residences and residentially designated land, licensed day cares, public parks, recognized places of worship, public or licensed private schools, licensed treatment facilities for drugs or alcohol, federal lands held in trust or proposed before CLUO adoption to be taken into trust for a federally recognized tribe, and licensed youth centers. Personal outdoor grows would be required to meet the above buffering requirements with the exception of the 75-foot buffer from residentially designated lands, as this would have the unintended effect of prohibiting such use entirely. Under this alternative, implementation of the CLUO could require relocation of nine existing and eligible cultivation sites to meet the assumed buffering and zoning requirements.

Alternative 4: Mixed-Light/Indoor License Types Only with Moderate Limits, No Hoop Houses or Outdoor Types

Alternative 4 assumes that personal cultivation, commercial cannabis cultivation, nurseries, processing, and microbusinesses would be limited to indoor and mixed-light operations within a structure. It is assumed that 75 of the existing and eligible cannabis cultivation sites with outdoor cultivation would convert entirely to indoor or mixed-light cultivation in greenhouses or indoor buildings. As defined, implementation of this alternative would result in 132 cannabis operations countywide plus unlimited cultivation for personal use conducted in accordance with applicable state and local (County) laws:

- personal (indoor only): unlimited
- cultivation: 80 (includes 78 operations from Alternative 1)
- nurseries: 5
- processing: 5
- manufacturing: 20
- testing: 5
- distribution: 10
- retail: 2
- microbusiness: 5

Alternative 4 includes the ability of the County to establish by resolution limits on the number of cannabis operations to avoid the overconcentration of such uses in distinct subregions (for example, within the defined comment areas of the County's citizen's advisory committees (see Section 8-2.1406(H) of the proposed CLUO). Under this alternative, implementation of the CLUO could require relocation of nine existing and eligible cultivation sites to meet the assumed zoning requirements. Because no outdoor cannabis activities are allowed under this alternative, it does not include buffers from identified sensitive land uses.

Alternative 5: All License Types with Moderate Limits, within Agricultural Zones Only, No Retail

Alternative 5 assumes for all license types, with the exception of retail, but would limit commercial cannabis (including personal outdoor grows) to agricultural zone districts. Personal indoor grows would be allowed in all zoning districts. As defined, implementation of this alternative would result in 130 cannabis operations countywide plus unlimited cultivation for personal use conducted in accordance with applicable state and local (County) laws:

- personal: unlimited
- cultivation: 80 (includes 78 operations from Alternative 1)
- nurseries: 5
- processing: 5
- manufacturing: 20
- testing: 5
- distribution: 10
- microbusiness: 5

This alternative includes 1,000-foot buffers between outdoor cannabis uses and the following uses: occupied off-site residences and residentially designated land, licensed day cares, public parks, recognized places of worship, public or licensed private schools, licensed treatment facilities for drugs or alcohol, federal lands held in trust or proposed before CLUO adoption to be taken into trust for a federally recognized tribe, and licensed youth centers. Under this alternative, implementation of the CLUO would require relocation of 30 existing and eligible cultivation sites to meet the assumed buffering and zoning requirements. Personal outdoor grows would be required to meet the above buffering requirements with the exception of the 1,000-foot buffer from residentially designated lands, as that would have the unintended effect of prohibiting such use entirely.

SCOPE OF EIR

This is a Program EIR, which is defined in State CEQA Guidelines Section 15168 as an EIR addressing:

[A] series of actions that can be characterized as one large project and are related either:

- (1) Geographically;
- (2) As logical parts in the chain of contemplated actions;
- (3) In connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or
- (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts which can be mitigated in similar ways.

A Program EIR has several benefits. For example, it provides a basic reference document to avoid unnecessary repetition of facts or analysis in subsequent project-specific assessments. It also allows the lead agency to consider the broad, regional impacts of a program of actions before its adoption and eliminates redundant or contradictory approaches to the consideration of regional and cumulative impacts.

INTENDED USE OF THIS EIR

CEQA requires that public agencies consider the significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (Public Resources Code [PRC] Section 21000 et seq.). It also requires that each public agency avoid or mitigate to less-than-significant levels, wherever feasible, significant adverse environmental effects of projects it approves or implements. If implementing a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less-than-significant levels), the project can still be approved, but the lead agency decision maker—in this case, the Yolo County Board of Supervisors (Board)—must prepare findings and issue a “statement of overriding considerations,” explaining in writing the specific economic, social, or other considerations that they have determined, based on substantial evidence, make those significant effects acceptable (PRC Section 21002, CCR Section 15093).

According to State CEQA Guidelines Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental impact that cannot be clearly mitigated to a less-than-significant level. As required by CEQA, an EIR is used to inform public agency decision makers and the public of the significant environmental effects of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project.

In compliance with CEQA, this EIR discloses the environmental consequences of implementing the CLUO, assuming five alternative regulatory scenarios. This EIR is designed to fully inform the County decision makers, in addition to other responsible agencies, persons, and the general public, of the potential environmental effects of implementing the CLUO. Upon certification of the Final EIR, the Yolo County Board of Supervisors will use the analysis in this EIR to support a decision to adopt the proposed General Plan amendment and CLUO.

As encouraged under CEQA, the County intends to use this Program EIR prepared for the CLUO to streamline the environmental review and consideration of future cannabis operation applications. The County plans to make use of the streamlining provided by CEQA, as applicable. Subsequent to adoption of the CLUO, applicants will apply for Cannabis Use Permits pursuant to the new regulations. Individual applications for commercial cannabis operations under the ordinance will be subject to further site-specific environmental review as applicable under CEQA pursuant to State CEQA Guidelines Section 15168(c), Use with Later Activities. This section of the guidelines addresses environmental review of projects intended to be addressed in a program for which an EIR was prepared. The County may determine that the environmental impacts of an individual project are adequately addressed in the EIR and that no further environmental review is required, or it may determine that additional environmental review is required or could require focused environmental review. Preparation of a site-specific environmental review document would be required if the County determines that the individual project would cause a significant environmental impact that was not examined in the EIR or would substantially increase the severity of a previously identified significant impact under State CEQA Guidelines Sections 15162 and 15168(c). This Program EIR may also be used and/or relied upon by the California Department of Food and Agriculture for its licensing actions.

Under PRC Section 21083.3 and State CEQA Guidelines Section 15183, lead agencies can use EIRs prepared for zoning actions (such as this ordinance) to analyze the impacts of proposed cannabis projects that may be approved pursuant to the ordinance, and limit later project-level analysis to only site-specific issues not already examined (if any). Under the above-referenced code sections, CEQA analysis for later projects will be limited to issues “peculiar” to the site or new environmental concerns not previously addressed. State CEQA Guidelines Section 15183(f) provides that impacts are not “peculiar” to the project if uniformly applied development policies or standards substantially mitigate that environmental effect. Upon adoption, the CLUO will meet the definition of a uniformly adopted standard, and compliance with the CLUO will allow for CEQA streamlining to be used.

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Pursuant to State CEQA Guidelines Section 15382, a significant effect on the environment is defined as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.” Sections 3.1 through 3.15 of this Draft EIR describe in detail the significant environmental impacts that would result from implementing the CLUO under each of the five alternatives. Chapter 4 provides additional analysis of cumulative effects for each area of impact and a detailed assessment of impacts that may occur as a result of overconcentration within identified geographic areas. Chapter 6 provides a discussion of growth-inducing impacts and other sections required by CEQA. Table ES-1 summarizes the environmental impacts and mitigation measures discussed in these sections.

SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

The State CEQA Guidelines Section 15126.2(c) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed project is implemented. As documented throughout Chapter 3 (project level impacts) and Chapter 4, “Cumulative Impacts and Overconcentration,” of this Draft EIR, after implementation of the CLUO performance standards and identified mitigation measures, implementation of the CLUO would result in the following significant and avoidable impacts:

- Impact AES-3: Substantially Degrade the Existing Visual Character or Quality of the Project Area (all alternatives)
- Impact AQ-4: Expose a Substantial Number of People to Adverse Odors (all alternatives)
- Impact CUM-1: Cumulative Visual Character Impacts (all alternatives)
- Impact CUM-3: Cumulative Odor Impacts (all alternatives)
- Impact OVC-1: Visual Character Impacts from Overconcentration of Cannabis Uses (all alternatives)
- Impact OVC-3: Odor Impacts from Overconcentration of Cannabis Uses (all alternatives)

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

State CEQA Guidelines Section 15126.6 requires that an EIR identify the environmentally superior alternative among the alternatives analyzed. Section 15126.6(e)(2) states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives analyzed.

In addition to the five CLUO alternatives, Chapter 5, “Alternatives,” evaluates the No Project – No Cannabis Land Use Ordinance Alternative to allow a comparison of the environmental impacts of approving the CLUO under each of its five alternatives with the effects of not approving it. The No Project – No Cannabis Land Use Ordinance is similar to Alternative 1 as it would consist of the 78 cannabis cultivation sites that are currently allowed to cultivate in the County. However, the No Project-No Cannabis Land Use Ordinance Alternative would not include the adoption of the proposed CLUO and the cultivation operations would continue to operate under the existing licensing program under Yolo County Code Title 5, Chapter 20 (Marijuana Cultivation Ordinance).

As discussed in Chapter 5, “Alternatives,” Alternative 1 would be the environmentally superior alternative under unmitigated conditions. Under mitigated conditions, Alternatives 1, 2, 4, and 5 are relatively equivalent and individually environmentally superior when compared to the No Project – No CLUO Alternative and Alternative 3.

AREAS OF CONTROVERSY

State CEQA Guidelines Section 15123 requires the summary section of a Draft EIR to identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Areas of controversy associated with the project are:

- whether cannabis uses and activities should be allowed in unincorporated Yolo County;
- whether noncultivation cannabis activities should be allowed;
- whether existing allowed cannabis cultivation should be allowed to expand;
- interplay of non-cannabis agriculture and cannabis agriculture;
- whether cannabis is an agricultural land use;
- odor impacts from cannabis uses and activities;
- impacts in all environmental issue areas from cannabis uses and activities;
- impacts of overconcentration of cannabis uses in particular areas;
- social, economic, and safety/crime impacts of cannabis uses and activities; and
- concerns about the adequacy of the proposed buffers from sensitive land uses or receptors.

The Draft EIR addresses these issues to the extent that substantial evidence permits, and to the extent that the issues are environmental issues. It does not address impacts that are speculative and not reasonably foreseeable; it does not address issues that fall outside the scope of CEQA including most social and economic issues.

ISSUES TO BE RESOLVED

State CEQA Guidelines Section 15123 requires the summary section of a Draft EIR to identify issues to be resolved related to the proposed project. Issues to be resolved by the County are identified below, including issues that will not necessarily be resolved through the EIR:

- Should the proposed CLUO be adopted?
- Which project alternative (or combination) should be adopted?
- What level of density/intensity of cannabis uses and activities (license types) are appropriate and where?
- What buffers are most appropriate and from what uses?
- How and where should overconcentration be applied?

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
3.1 Aesthetics			
Impact AES-1: Have a Substantial Adverse Effect on a Scenic Vista or Viewshed	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact AES-2: Damage Scenic Resources Including, But Not Limited to, Trees, Rock Outcroppings, and Historic Buildings within a State Scenic Highway or County-Designated Scenic Roadway	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact AES-3: Substantially Degrade the Existing Visual Character or Quality of the Project Area	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	None available.	ALT 1: SU ALT 2: SU ALT 3: SU ALT 4: SU ALT 5: SU
Impact AES -4: Create a New Source of Substantial Light or Glare That Would Adversely Affect Day or Nighttime Views	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
3.2 Agricultural Resources			
Impact AG-1: Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), or Farmland of Local Importance	ALT 1: NI ALT 2: NI ALT 3: NI ALT 4: NI ALT 5: NI	No mitigation is required for any of the alternatives.	ALT 1: NI ALT 2: NI ALT 3: NI ALT 4: NI ALT 5: NI
Impact AG-2: Conflict with Existing Agricultural Zoning or with a Williamson Act Contract	ALT 1: NI ALT 2: NI ALT 3: NI ALT 4: NI ALT 5: NI	No mitigation is required for any of the alternatives.	ALT 1: NI ALT 2: NI ALT 3: NI ALT 4: NI ALT 5: NI

NI = No Impact, LTS = Less than significant, PS = Potentially significant, S = Significant, SU = Significant and unavoidable

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
Impact AG-3: Create Conflicts with Agricultural Uses or Conversion of Farmland to Nonagricultural Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact AG-4: Conflict with Yolo County General Plan and Community Policies Related to Agricultural Resources	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
3.3 Air Quality and Odors			
Impact AQ-1: Conflict with or Obstruct Implementation of Policies and Regulations Related to the Air Quality	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact AQ-2: Generate Construction-Related Emissions of Criteria Pollutants and Precursors That Exceed YSAQMD-Recommended Thresholds	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact AQ-3: Create Long-Term Operational Emissions of Criteria Pollutants and Precursors That Exceed YSAQMD-Recommended Thresholds	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact AQ-4: Expose a Substantial Number of People to Adverse Odors	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	<p>Mitigation Measure AQ-4: Conduct Wind Pattern Evaluations to Evaluate Odor Control (Alternatives 1, 2, 3, 4, and 5)</p> <p>The following shall be included as a new performance standard in Section 8-2.1408 (DD) of the CLUO:</p> <ul style="list-style-type: none"> As part of the cannabis use permit process, County staff shall conduct a wind pattern evaluation of each cannabis use application. This evaluation 	ALT 1: SU ALT 2: SU ALT 3: SU ALT 4: SU ALT 5: SU

NI = No impact, LTS = Less than significant, PS = Potentially significant, S = Significant, SU = Significant and unavoidable

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
		will utilize wind roses (a circular display of the frequency of wind coming from specific directions over a specified period of time). The wind pattern evaluation will identify receptors (as defined in Section 8.2-1408 [E]) located downwind of a proposed cannabis use and potentially affected by nuisance odor for a predominant period of time based on the wind frequency. This will provide staff with additional information for consideration when evaluating a cannabis use permit application.	
3.4 Biological Resources			
Impact BIO-1: Adversely Affect Special-Status Species	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	<p>Mitigation Measure BIO-1: Conduct Preapproval Reconnaissance-Level Surveys for Biological Resources, Participate in the Yolo HCP/NCCP (including payment of fees and implementation of AMMs), and Obtain Applicable Permits (Alternatives 1, 2, 3, 4, and 5)</p> <p>Expand the requirements of Section 8-2.1408(D) of the CLUO to include the following: <u>Reconnaissance-Level Survey</u></p> <p>Permittees shall include a reconnaissance-level survey for biological resources conducted on the parcel of the cannabis use by a qualified biologist (i.e., familiar with wildlife, plants, and habitats in Yolo County). The reconnaissance-level survey shall include the following elements:</p> <ul style="list-style-type: none"> • Prior to the reconnaissance-level survey, the qualified biologist shall conduct a data review to determine the special-status plant, special-status wildlife, sensitive habitats (e.g., federally-protected wetlands, waters of the state, riparian habitat, sensitive natural communities) that have the potential to occur within the proposed activity footprint of the cannabis use. This will include review of the best available, current data including vegetation mapping data, the Yolo HCP/NCCP, and database searches of the CNDDDB and the CNPS Inventory of Rare and Endangered Plants of California. • The qualified biologist shall map land cover, identify natural communities, and assess the habitat suitability of the proposed activity footprint of the cannabis use for special-status plants, special-status wildlife, and sensitive habitats identified as having potential to occur, consistent with the requirements of the Yolo HCP/NCCP for species covered by the plan, and consistent with Term 10 under Attachment A (General Requirements and Prohibitions) of SWRCB Order WQ 2019-0001-DWQ, if applicable. 	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
		<ul style="list-style-type: none"> • The biologist shall provide a letter report to the applicant and the County with evidence to support a conclusion as to whether special-status species and sensitive habitats are present or are likely to occur within the proposed activity footprint of the cannabis use. • If the reconnaissance-level survey identifies no potential for special-status plants, special-status wildlife, or sensitive habitats to occur, the applicant will not be subject to additional biological resources protection measures. • If special-status plants, special-status wildlife, suitable habitat for these species, or sensitive habitats are identified within or adjacent to the proposed activity footprint of the cannabis use, then the following measures would apply. <p><u>Species Covered under the Yolo HCP/NCCP</u> If species covered under the Yolo HCP/NCCP are determined to be present or likely to be present within the proposed activity footprint of the cannabis use, the applicant shall assume presence of these species and satisfy the requirements of the HCP/NCCP.</p> <ul style="list-style-type: none"> • If species covered under the Yolo HCP/NCCP that are not listed under CESA or ESA or are only listed under CESA could occur within the proposed activity footprint of the cannabis use, payment of HCP/NCCP mitigation fees and implementation of applicable HCP/NCCP avoidance and minimization measures are required • If species covered under the Yolo HCP/NCCP that are also listed under both CESA and ESA or only under ESA could occur within the proposed activity footprint of the cannabis use, the applicant must avoid impacts by implementing no-disturbance buffers or redesigning the project until such time as federal permits, authorizations, and procedures/protocols under the HCP portion of the HCP/NCCP can be applied. <p><u>Special-Status Species Not Covered under the Yolo HCP/NCCP</u> If species not covered under the Yolo HCP/NCCP are determined to be present or likely to be present within the proposed activity footprint of the cannabis use, the applicant shall apply biological resource protection measures consistent with state and local requirements as described below:</p> <ul style="list-style-type: none"> • If CDFW Species of Special Concern, species listed only under CESA, nesting raptors and native birds protected under California Fish and Game Code, or plants considered by CDFW to be "rare, threatened, or endangered 	

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Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
		<p>in California" could occur within the proposed activity footprint of the cannabis use, the applicant will retain a qualified biologist to conduct protocol-level surveys for these species where established, current protocols are available (e.g., Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities [CDFW 2018b], Staff Report on Burrowing Owl Mitigation [CDFG 2012]). If an established protocol is not available for a special-status species, then the qualified biologist will consult with CDFW or USFWS to determine the survey protocol.</p> <ul style="list-style-type: none"> • If CDFW Species of Special Concern, species listed only under CESA, or plants considered by CDFW to be "rare, threatened, or endangered in California" are identified within the proposed activity footprint of the cannabis use during protocol-level surveys, then these species will be avoided by implementing no-disturbance buffers or redesigning the project, if feasible. • If avoidance of CDFW Species of Special Concern, species listed only under CESA, or plants considered by CDFW to be "rare, threatened, or endangered in California" is not feasible, then the applicant will consult with CDFW to determine applicable, established minimization measures for the given species, and will implement these measures. If impacts on species listed under CESA are unavoidable, then the applicant will submit an incidental take permit application to CDFW and receive take authorization before commencing development of the proposed activity footprint of the cannabis use. Conditions of incidental take authorization may include minimization measures to reduce impacts, and compensation for loss of the species including but not limited to purchasing credits from a CDFW-approved mitigation bank. • If species listed under both CESA and ESA or only under ESA could occur within the proposed activity footprint of the cannabis use, the applicant must avoid impacts by implementing no-disturbance buffers or redesigning the project until such time as federal permits, authorizations, and procedures/protocols can be applied. <p>Sensitive Habitats If sensitive habitats, including federally-protected wetlands, waters of the state, riparian habitat, or sensitive natural communities (e.g., elderberry savanna, valley oak</p>	

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Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
		woodland) are identified within the proposed activity footprint of the cannabis use, these habitats will be avoided by implementing no-disturbance buffers as required by the SWRCB and the Yolo HCP/NCCP, such that the habitat is completely protected from direct and indirect adverse effects of project development. All ground disturbance, vegetation removal, and staging activities will be prohibited within this no-disturbance buffer, which may require project redesign. <ul style="list-style-type: none"> A delineation of waters of the United States, including identification of hydrology, hydric soils, and hydrophytic vegetation, by a qualified biologist may be required to identify the exact extent of wetland features. If federally protected wetlands cannot be avoided by at least 50 feet, then the proposed commercial cannabis operation will not be permitted until such time as cannabis uses may receive federal wetland permitting coverage under Section 404 of the CWA. 	
Impact BIO-2: Adversely Affect Riparian Habitat and Other Sensitive Natural Communities	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	Mitigation Measure BIO-2: Implement Mitigation Measure BIO-1: Conduct Preapproval Biological Reconnaissance Surveys, Participate in the Yolo HCP/NCCP, Implement Avoidance and Minimization Measures, and Obtain Applicable Permits (Alternatives 1, 2, 3, 4, and 5)	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact BIO-3: Adversely Affect State-Protected or Federally Protected Wetlands	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	Mitigation Measure BIO-3: Implement Mitigation Measure BIO-1: Conduct Preapproval Biological Reconnaissance Surveys, Participate in the Yolo HCP/NCCP, Implement Avoidance and Minimization Measures, and Obtain Applicable Permits (Alternatives 1, 2, 3, 4, and 5)	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact BIO-4: Interfere Substantially with the Movement of Resident or Migratory Wildlife Species or with Wildlife Corridors or Impede the Use of Native Wildlife Nursery Sites	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	Mitigation Measure BIO-4: Implement Mitigation Measure BIO-1: Conduct Preapproval Biological Reconnaissance Surveys, Participate in the Yolo HCP/NCCP, Implement Avoidance and Minimization Measures, and Obtain Applicable Permits (Alternatives 1, 2, 3, 4, and 5)	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact BIO-5: Conflict with Any Local Policies or Ordinances Protecting Biological Resources	ALT 1: NI ALT 2: NI ALT 3: NI ALT 4: NI ALT 5: NI	No mitigation is required for any of the alternatives.	ALT 1: NI ALT 2: NI ALT 3: NI ALT 4: NI ALT 5: NI

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Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
Impact BIO-6: Conflict with the Yolo HCP/NCCP	ALT 1: NI ALT 2: NI ALT 3: NI ALT 4: NI ALT 5: NI	No mitigation is required for any of the alternatives.	ALT 1: NI ALT 2: NI ALT 3: NI ALT 4: NI ALT 5: NI
Impact BIO-7: Substantially Reduce the Habitat of a Fish or Wildlife Species; Cause a Fish or Wildlife Population to Drop below Self-Sustaining Levels; Threaten to Eliminate a Plant or Animal Community; or Substantially Reduce the Number or Restrict the Range of an Endangered, Rare, or Threatened Species	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
3.5 Cultural Resources			
Impact CULT-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CULT-2: Cause a Substantial Adverse Change in the Significance of an Archaeological Resource	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CULT-3: Disturb Any Human Remains, Including Those Interred Outside of Dedicated Cemeteries	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CULT-4: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
3.6 Energy			
Impact ENE-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact ENE-2: Conflict with Plans for Renewable Energy and Energy Efficiency	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
3.7 Geology and Soils			
Impact GEO-1: Create Substantial Soil Erosion or Loss of Topsoil	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact GEO-2: Be Located on a Geologic Unit or Soil That Is Unstable or Would Become Unstable as a Result of the Project or Be Located on Expansive Soil, Creating Direct or Indirect Risks to Life or Property	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact GEO-3: Destroy a Unique Paleontological Resource or Site or Unique Geologic Feature	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact GEO-4: Result in the Loss of Availability of a Known Mineral Resource or Locally Important Mineral Resource Recovery Site	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
3.8 Greenhouse Gas Emissions and Climate Change			
Impact GHG-1: Generate Greenhouse Gas Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment or Conflict with Plan or Policies Adopted to Reduce Emissions of Greenhouse Gases	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	Mitigation Measure GHG-1: Demonstrate Compliance with Yolo County CAP (Alternatives 1, 2, 3, 4, and 5) The following shall be included as a new performance standard in Section 8-2.1408 of the CLUO: <ul style="list-style-type: none"> Permittees shall demonstrate compliance with the applicable provisions of the Yolo County Climate Action Plan (CAP) including energy efficiency measures for irrigation pumps and water efficiency requirements for buildings. 	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
3.9 Hazards			
Impact HAZ-1: Create a Significant Hazard through Transport, Use, or Disposal of Hazardous Materials	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact HAZ-2: Create a Significant Hazard to the Public or Environment through Reasonably Foreseeable Upset and/or Accident Conditions Involving Release of Hazardous Materials or Be Located on a Site Included on a List of Hazardous Material Sites Complied Pursuant to Government Code Section 65962.5, Which Would Create a Significant Hazard to the Public or Environment	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact HAZ-3: Emit Hazardous Emissions or Handle Hazardous Materials within 0.25 Mile of an Existing or Proposed School	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact HAZ-4: Result in a Safety Hazard or Noise for People Residing or Working within 2 Miles of a Public Airport or Public Use Airport	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
Impact HAZ-5: Impair or Physically Interfere with Emergency Response or Evacuation Plans	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact HAZ-6: Expose People or Structures to a Significant Risk of Loss, Injury, or Death Involving Wildfires, Exacerbate Wildfire Risks from Installation of Infrastructure, or Expose People or Structures to Significant Risks Due to Postfire Conditions	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
3.10 Hydrology and Water Quality			
Impact HYDRO-1: Violate Any Water Quality Standards or Waste Discharge Requirements or Otherwise Substantially Degrade Surface Water or Groundwater Quality through Development or Alteration of Drainage Patterns	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact HYDRO-2: Decrease Groundwater Supplies or Interfere with Groundwater Recharge That May Impede Sustainable Groundwater Management and Increase Demand for Water Supply	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact HYDRO-3: Impede or Redirect Drainage Patterns in a Manner That Would Result in Flooding	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact HYDRO-4: Conflict with a Water Quality Control Plan	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	<p>Mitigation Measure HYDRO-4: Prepare a Wastewater Pre-Treatment Program for Commercial Cannabis Activities Discharging to Public Wastewater Systems (Alternatives 1, 2, 3, 4, and 5)</p> <p>The following shall be added to Section 8.2.1408(TT) of the CLUO:</p> <ul style="list-style-type: none"> Applicants for indoor cultivation and noncultivation cannabis operations shall prepare a wastewater pre-treatment program that will characterize 	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
		wastewater generated and will identify any additional treatment measures required to allow discharge to a public wastewater system without violating the waste discharge requirements of the facility.	
3.11 Land Use			
Impact LU-1: Physically Divide an Established Community	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact LU-2: Cause a Significant Environmental Impact Due to a Conflict with any Land Use Plan, Policy, or Regulation Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact LU-3: Induce Substantial Unplanned Population Growth in an Area, Either Directly or Indirectly	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
3.12 Noise			
Impact NOI-1: Create Excessive Noise Levels from Construction Activities	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	<p>Mitigation Measure NOI-1: Implement Construction-Noise Reduction Measures (Alternatives 1, 2, 3, 4, and 5)</p> <p>The following new performance standards shall be included under Section 8-2.1408 of the CLUO:</p> <ul style="list-style-type: none"> From 6:00 a.m. to 6:00 p.m., noise levels shall not exceed an average noise level equivalent (L_{eq}) of eighty (80) decibels (dBA) measured at the property boundaries of the site. However, noise levels shall not exceed an average noise level equivalent (L_{eq}) of sixty (60) decibels (dBA) for any nearby off-site residences or other noise-sensitive land uses. From 6:00 p.m. to 6:00 a.m., noise levels shall not exceed an average noise level equivalent (L_{eq}) of sixty-five (65) decibels (dBA) measured at the property boundaries of the site. 	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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		<ul style="list-style-type: none"> At no time shall noise levels exceed a community noise equivalent (CNEL) of sixty (60) decibels (dBA) for any existing residence or other noise-sensitive land use. An existing residence shall be considered the property line of any residentially zoned area or, in the case of agricultural land, any occupied off-site residential structures. Achieving the noise standards may involve setbacks, the use of quieter equipment adjacent to residences, or other appropriate measures. 	
Impact NOI-2: Create Excessive Operational Non-Transportation Noise	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact NOI-3: Create Excessive Traffic Noise	ALT 1: NI ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: NI ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
3.13 Public Services and Recreation			
Impact PS-1: Result in Substantial Adverse Physical Impacts Associated with the Need for New or Physically Altered Fire Protection Facilities	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact PS-2: Result in Substantial Adverse Physical Impacts Associated with the Need for New or Physically Altered Law Enforcement Facilities	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
3.14 Transportation and Circulation			
Impact TRANS-1: Conflict with Program, Plan, Ordinance or Policy Addressing the Circulation System	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact TRANS-2: Conflict or be Inconsistent with CEQA Guidelines Section 15064.3(b)	ALT 1: NI ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: NI ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
3.15 Utilities and Service Systems			
Impact UTIL-1: Result in Relocation or Expansion of Wastewater Treatment Systems and Facilities	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact UTIL-2: Result in Relocation or Expansion of Water Supply Systems	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact UTIL-3: Generate Solid Waste in Excess of Solid Waste Facilities or That Conflicts with Regulations	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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4.1 Cumulative			
Impact CUM-1: Contribution to Cumulative Aesthetic Impacts	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	There are no known feasible measures that would offset cumulative impacts.	ALT 1: SU ALT 2: SU ALT 3: SU ALT 4: SU ALT 5: SU
Impact CUM-2: Contribution to Cumulative Agricultural Resource Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-3: Contribution to Cumulative Air Quality and Odor Impacts	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	There are no known feasible measures that would offset cumulative impacts.	ALT 1: SU ALT 2: SU ALT 3: SU ALT 4: SU ALT 5: SU
Impact CUM-4: Contribution to Cumulative Biological Resource Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-5: Contribution to Cumulative Cultural Resource Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-6: Contribution to Cumulative Energy Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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Impact CUM-7: Contribution to Cumulative Geology and Soil Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-8: Contribution to Cumulative Greenhouse Gases and Climate Change Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-9: Contribution to Cumulative Hazards and Hazardous Material Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-10: Contribution to Cumulative Hydrology and Water Quality Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-11: Contribution to Cumulative Land Use and Planning Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-12: Contribution to Cumulative Noise Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-13: Contribution to Cumulative Public Service Impacts	ALT 1: LTS ALT 2: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS

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Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
	ALT 3: LTS ALT 4: LTS ALT 5: LTS		ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-14: Contribution to Cumulative Transportation and Circulation Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact CUM-15: Contribution to Cumulative Utilities and Service System Impacts	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
4.2 Overconcentration			
Impact OVC-1: Aesthetic Impacts from Overconcentration of Cannabis Uses	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	<p>Mitigation Measure OVC-1a: Modify CLUO Section 8-2.1406(H) (Alternative 1-5) Establish and implement detailed procedures for implementing Section 8-2.1406(H) of the proposed CLUO for all Alternatives 1 through 5 to include the following:</p> <ol style="list-style-type: none"> I. Establish a threshold for the number of sites within a six-mile diameter area that would not constitute over-concentration. Based on the EIR analysis, the threshold is five or fewer sites. II. Establish a threshold for the number of sites within a six-mile diameter area that constitutes over-concentration. Based on the EIR analysis, the threshold falls between six and 22 sites which is the identified range of potential overconcentration. The Board of Supervisors will identify a specific threshold for over-concentration as a matter of policy and this threshold will be included in the adopted CLUO as reflected in VI below. III. Prohibit the issuance of any Cannabis Use Permits in any identified or future six-mile diameter area in excess of the threshold established in II above, unless special findings described in VI below are made. IV. The Board of Supervisors shall have final decision-making authority over Cannabis Use Permits in areas of potential over-concentration and over-concentration. In 	ALT 1: SU ALT 2: SU ALT 3: SU ALT 4: SU ALT 5: SU

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Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
		<p>other areas, the Planning Commission will be the decision-making authority, and would only go before the Board of Supervisors on appeal.</p> <p>V. The County shall establish a procedure and appropriate resources for processing use permit applications under the adopted CLUO such that all sites within each of the four identified clusters will be processed simultaneously to enable consideration of community specific issues and to facilitate community involvement. Use permit applications for the 78 existing and eligible licensees will be processed prior to acceptance of subsequent applications.</p> <p>VI. To satisfy Mitigation Measure OVC-1a through c, the proposed language for Section 8-2.1406(H) shall be modified as follows:</p> <p><u>Section 8-2.1406 (H) Over-Concentration – Five or less cannabis use permits in any area of the County with a diameter of six-miles shall not be considered over-concentrated. Six to XX cannabis use permits in any area of the County with a diameter of six-miles shall be considered potentially over-concentrated. More than XX cannabis use permits in any area of the County with a diameter of six miles shall be considered over-concentrated, and shall not be allowed unless special findings are made as described further below.</u>³</p> <p><u>By resolution adopted concurrently with, or subsequent to, this article, as may be amended from time to time, the Board of Supervisors shall establish procedures and commit resources to implement this section and ensure processing of cannabis use permits in areas of potential over-concentration and over-concentration, consistent with the adopted CLUO.</u></p> <p><u>By resolution adopted concurrently with, or subsequent to, this article, as may be amended from time to time, the Board of Supervisors may establish limitations on the number of cannabis operations that may be approved in distinct subregions of the County. The subregions correspond with the jurisdictional boundaries of local General Plan Citizens' Advisory Committees. Note: Limitations or "caps" on the number of allowed cannabis operations in various County sub regions have not yet been determined but are expected to be based primarily on population size and density in each subregion, with higher caps in less populated, less dense subregions. For purposes of applying any limitations set forth in such resolution,</u></p> <p><u>Multiple licenses/permits (including permitted co-locations) at a single address shall count as one operation. Subject to this limitation, each operation covered by</u></p>	

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Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
		<p>a development agreement approved through the “early” development agreement process that predated this article shall also count against the limitation.</p> <p>If any combination of the number of approved use permits, “early” development agreements, or pending permit applications exceeds the limitation within a subregion, The Board of Supervisors shall be the final decision-making authority on any use permit application <u>within an area of potential over-concentration or over-concentration.</u></p> <p>The Board may approve a use permit in an area of if the approval would create or add to an over-concentration only upon making special findings that denial of the application would unduly limit development of the legal market so as to perpetuate the illegal market for cannabis and related products, and that the approval would not cause or contribute to a cannabis-related law enforcement problem or other public nuisance in the affected subregion and any surrounding affected areas.</p> <p>³ This will be replaced with the threshold determined by the Board of Supervisors pursuant to Mitigation Measure OVC-1a(II)</p> <p>Mitigation Measure OVC-1b: Establish Priority Processing for Cannabis Use Permits in Cluster Areas (Alternatives 1-5) Adopt procedures pursuant to Mitigation Measure OVC-1a V to ensure that Cannabis Use Permits for existing cannabis cultivation sites in the Guinda/Rumsey Cluster #1, Willow Oaks/Monument Hills Cluster #2, Dunnigan Area Cluster #3, and Esparto Area Cluster #4 are processed prior to the consideration of new cannabis uses under any alternative.</p> <p>Mitigation Measure OVC-1c: Expand Cannabis Use Permit Issuance Findings (Alternatives 1-5) Modify CLUO Section 8-2.1406(L) to add the following community considerations in addition to the those already identified in the CLUO for determining whether to grant a Cannabis Use Permit:</p> <ul style="list-style-type: none"> • Number of cannabis operations in area • Proximity of cannabis operations (e.g. to each other/and/or to other identified sensitive uses) • Adjoining/nearby land uses • Population in area 	

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Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
		<ul style="list-style-type: none"> • Crime rate in area • Compliance history of the applicant and/or operator • Nuisance abatements in area • Community character • Community support • Parcels size and proposed uses on non-cannabis portion of parcel • Subject matter input relevant to the specific location or proposed project from County department and division heads • Other cultural, social, equity, and environmental justice concerns deemed applicable by the County 	
Impact OVC-2: Agricultural Resource Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact OVC-3: Air Quality and Odor Impacts from Overconcentration of Cannabis Uses	ALT 1: S ALT 2: S ALT 3: S ALT 4: S ALT 5: S	<p>Mitigation Measure OVC-1a: Modify CLUO Section 8-2.1406(H) (Alternative 1-5)</p> <p>Mitigation Measure OVC-1b: Establish Priority Processing for Cannabis Use Permits in Cluster Areas (Alternatives 1-5)</p> <p>Mitigation Measure OVC-1c: Expand Cannabis Use Permit Issuance Findings (Alternatives 1-5)</p>	ALT 1: SU ALT 2: SU ALT 3: SU ALT 4: SU ALT 5: SU
Impact OVC-4: Biological Resource Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact OVC-5: Cultural Resource Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
Impact OVC-6: Energy Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact OVC-7: Geology and Soil Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact OVC-8: Greenhouse Gases and Climate Change Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact OVC-9: Hazards and Hazardous Material Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact OVC-10: Hydrology and Water Quality Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact OVC-11: Land Use and Planning Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measure (Alternative to which it applies)	Significance after Mitigation
Impact OVC-12: Noise Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact OVC-13: Public Service Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact OVC-14: Transportation and Circulation Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS
Impact OVC-15: Utilities and Service System Impacts from Overconcentration of Cannabis Uses	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS	No mitigation is required for any of the alternatives.	ALT 1: LTS ALT 2: LTS ALT 3: LTS ALT 4: LTS ALT 5: LTS

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