



## PROJECT SUMMARY

Project Title	Commercial Cannabis Business Licensing Program
Project No./Case No.	PRJ2024-000811
Related Case No(s).	RPPL2024001191
Lead Agency Name & Address	County of Los Angeles 320 W. Temple Street, Room G-10 Los Angeles, CA 90012
Staff Contact	Fernando G. Nieto, Program Chief
Staff Email & Phone Number	<a href="mailto:fnieto@dcba.lacounty.gov">fnieto@dcba.lacounty.gov</a>   (213) 712-5459
Project's Sponsor/ Project Applicant's Name & Address	County of Los Angeles Department of Consumer and Business Affairs (DCBA), Office of Cannabis Management ("County OCM") 320 W. Temple Street, Room G-10 Los Angeles, CA 90012
Project Location	Unincorporated Los Angeles County
General Plan or Community/Area Plan Designation	Implementation of the proposed Project, if approved, would occur in unincorporated Los Angeles County in eligible zones.
Planning Area	Implementation of the proposed Project, if approved, would occur in unincorporated Los Angeles County within eligible zones.

<p>Zoning/Community Standards District (if applicable)</p>	<p>Implementation of the proposed Project, if approved, would occur in unincorporated Los Angeles County in eligible zones.</p>
<p><b>Brief Description of Project:</b></p> <p>Consistent with State law and State cannabis licensing requirements, the County of Los Angeles (County) is proposing to adopt a cannabis business licensing program to regulate all commercial cannabis activities within unincorporated areas of Los Angeles County.</p>	
<p><b>Surrounding Land Uses &amp; Setting:</b></p> <p>Implementation of the proposed Project, once approved, would occur in unincorporated areas in eligible commercial/mixed-use, industrial, and institutional zones. Eligible areas are generally located within existing commercial/mixed-use, institutional, and industrial areas in the unincorporated area of the county, including certain specific plan areas.</p>	
<p><b>Native American Consultation:</b></p> <p>Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? N/A</p> <p>Prior to release of the Draft Environmental Impact Report (EIR), the County will initiate consultation with applicable tribes and representatives pursuant to the requirements of Public Resources Code § 21080.3.1.</p> <p>Note: Conducting consultation early in the California Environmental Quality Act (CEQA) process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code § 21080.3.2.) Information may also be available from the Native American Heritage Commission's (NAHC's) Sacred Lands File (SLF) per Public Resources Code § 5097.96 and the California Historical Resources Information System (CHRIS) administered by the California Office of Historic Preservation (OHP). Public Resources Code § 21082.31 contains provisions specific to confidentiality.</p>	
<p>Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreements):</p>	
<p><i>Public Agency</i></p> <p>N/A</p>	<p><i>Approval Required</i></p> <p>N/A</p>

Concurrent projects in the area:

<i>Project/Case No.</i>	<i>Description and Status</i>
Click or tap here to enter text.	Click or tap here to enter text.
Click or tap here to enter text.	Click or tap here to enter text.

List of Tables

Table 1. Allowed Cannabis Business Types in Commercial Zones .....16

Table 2. Allowed Cannabis Business Types in Industrial/Institutional Zones .....16

Reviewing Agencies:

*Responsible Agencies*

- None
- Regional Water Quality Control Board:
  - Los Angeles Region
  - Lahontan Region
- Coastal Commission
- Army Corps of Engineers
- LAFCO

*Special Reviewing Agencies*

- None
- Santa Monica Mountains Conservancy
- National Parks
- National Forest
- Edwards Air Force Base
- Resource Conservation District of Santa Monica Mountains
- 

*Regional Significance*

- None
- SCAG Criteria
- Air Quality
- Water Resources
- Santa Monica Mtns. Area
- Caltrans

*Trustee Agencies*

- None
- State Dept. of Fish and Wildlife
- State Dept. of Parks and Recreation
- State Lands Commission
- University of California (Natural Land and Water Reserves System)

*County Reviewing Agencies*

- Public Works
- Fire Department
  - Planning Division
- Sanitation District
- Public Health/Environmental Health Division
- Sheriff's Department
- Department of Parks and Recreation
- Subdivision Committee
- Department of Regional Planning
-

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially significant impacts affected by this project.


- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Aesthetics             | <input checked="" type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Agriculture & Forestry | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation                                    |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality                  | <input checked="" type="checkbox"/> Transportation                     |
| <input type="checkbox"/> Biological Resources   | <input checked="" type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Tribal Cultural Resources                     |
| <input type="checkbox"/> Cultural Resources     | <input type="checkbox"/> Mineral Resources                        | <input checked="" type="checkbox"/> Utilities/Service Systems          |
| <input checked="" type="checkbox"/> Energy      | <input type="checkbox"/> Noise                                    | <input type="checkbox"/> Wildfire                                      |
| <input type="checkbox"/> Geology & Soils        | <input type="checkbox"/> Population/Housing                       | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

## DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or

mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Fernando G. Nieto		3/4/25
Print Name (Project Planner)	Signature (Project Planner)	Date
Laura Magallanes		3/4/25
Print Name (Section Head)	Signature (Section Head)	Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVI, "Earlier Analysis," may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration (CEQA Guidelines § 15063[c][3][D]). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

- c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify the significance threshold, if any, used to evaluate each question and mitigation measures identified, if any, to reduce the impact to a less than significant level. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

---

## PROJECT INFORMATION

### PROJECT BACKGROUND AND REGULATORY CONTEXT

#### Project Background

On November 8, 2016, voters passed Proposition 64 to legalize cannabis under State law for use by adults 21 or older, including the cultivation of cannabis for personal use. As a result, the State must license all commercial cannabis activity, collect State licensing taxes, and implement quality control programs for all commercial cannabis activities. The California Department of Cannabis Control (DCC) is responsible for State licensing of commercial cannabis operations pursuant to Proposition 64 and the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA).

Proposition 64 also authorized local regulation (up to and including complete prohibition) and taxation of cannabis businesses. Consequently, since 2017 the County has taken several actions to regulate cannabis businesses in the unincorporated areas of Los Angeles County, as follows:

- June 2017. The County Board of Supervisors approved a motion to ban all cannabis businesses in the unincorporated areas of the county and established regulations for legal personal cannabis cultivation within dwelling units and outdoors on properties with single-family residences and detached residential condominiums.<sup>1</sup>
- December 2017. The County Board of Supervisors adopted public health regulations to ensure that commercial cannabis activities protect the health and safety of consumers and the public.<sup>2</sup>
- July 2021. The County Board of Supervisors directed the Department of Consumer and Business Affairs' (DCBA's) Office of Cannabis Management (OCM) to provide recommendations for a cannabis business regulatory program that includes a social equity component.<sup>3</sup>
- November 2022. Voters approved Measure C, a general tax measure that allows the County to tax cannabis businesses in the unincorporated areas of the county.<sup>4</sup>

---

<sup>1</sup> February 7, 2017 Approved Motion. <https://file.lacounty.gov/SDSInter/bos/supdocs/111354.pdf>.

<sup>2</sup> Los Angeles County Municipal Code. 2024. [https://library.municode.com/ca/los\\_angeles\\_county/codes/code\\_of\\_ordinances?nodeId=TIT8COPRBUWARE\\_DIV\\_1PUHELI\\_CH8.04PUHELI\\_PT7COCAAC](https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT8COPRBUWARE_DIV_1PUHELI_CH8.04PUHELI_PT7COCAAC).

<sup>3</sup> July 13, 2021 Approved Motion. <https://file.lacounty.gov/SDSInter/bos/supdocs/159887.pdf>.

<sup>4</sup> Los Angeles County Cannabis Business Tax Measure C. 2022. <https://dcba.lacounty.gov/cannabis-business-tax/>.



- February 2022. The County Board of Supervisors directed OCM to develop and implement an equitable commercial cannabis licensing program in the unincorporated areas of the county.<sup>5</sup>

## Existing Cannabis Regulations

The State DCC licenses implement other requirements that apply to commercial cannabis activity in California. The following summarizes key information about State licensing and operational requirements; for a comprehensive description of State requirements and procedures, please see <https://cannabis.ca.gov/>.

The commercial cannabis industry comprises activities for the production and sale of cannabis. The State DCC issues cannabis licenses based on the type of cannabis activity the business would perform and the size/scale of the operations, including:

- Cultivation and packaging/processing of raw cannabis plant material
- Manufacturing and packaging/processing of cannabis products
- Testing of raw cannabis and cannabis products prior to sale
- Distributing raw cannabis and manufactured cannabis products
- Retail sales of cannabis products
- Microbusinesses, where more than three of the following activities would occur: cultivation up to 10,000 square feet, distribution, non-volatile manufacturing, and retail sales (both storefront and non-storefront)
- Conducting events where cannabis is sold

Except for microbusinesses, if a cannabis business involves more than one activity, more than one State license may be required. A cannabis business must possess both a local license and a State DCC license to legally operate. State cannabis licenses are valid for one year and must be renewed annually up to 60 days before the license expiration date.

The State DCC reviews all license applications for completeness and conducts the following actions prior to issuing a license:

- Contacts the city or county where the business is located to confirm that the applicant meets all local requirements, including possession of a valid local license and land use permit, if required;
- Reviews the applicant's criminal history, if any; and
- Reviews the submitted application information to verify the proposed cannabis business will comply with all requirements that apply to the requested license type(s).

---

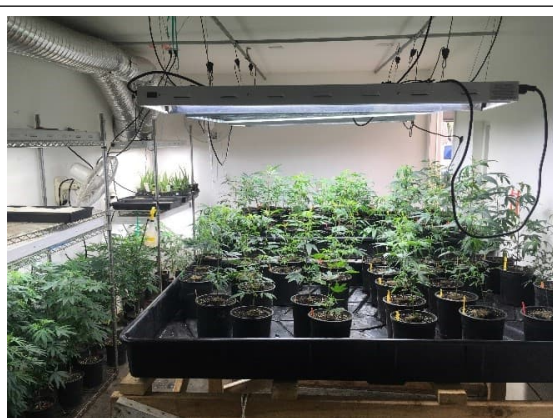
<sup>5</sup> Los Angeles County Consumer & Business Affairs. 2022. Board of Supervisors Approve Commercial Cannabis Licensing in Unincorporated LA County. <https://dcba.lacounty.gov/wp-content/uploads/2022/02/Media-Release-Office-of-Cannabis-Management-Commercial-2.15.22.pdf>.

Pursuant to the State's licensing program, cities and counties can decide which types of cannabis businesses they permit or prohibit. Although the County has adopted public health regulations that would apply to commercial cannabis activities to protect the health and safety of consumers and the public (Los Angeles County Code [LACC], Title 11, Health and Safety), it currently prohibits all commercial cannabis activities. However, the County allows cannabis cultivation for personal use under certain conditions and pursuant to State law (LACC Section 22.140.134).

## PROJECT DESCRIPTION

### Project Overview

The County is proposing to adopt a Commercial Cannabis Business Licensing Program (Project) that would permit, regulate, and monitor all cannabis businesses in unincorporated areas of Los Angeles County. Consistent with the County Board of Supervisors' direction, the proposed Project would amend the LACC to establish an equitable cannabis business regulatory program that will regulate where, how, and who may conduct commercial cannabis activities in unincorporated areas. The proposed Project would establish land use permitting, business operations, annual monitoring and reporting requirements for cannabis businesses to protect communities from adverse effects and nuisances. The proposed Project would



*Commercial cannabis activities would be restricted to indoor-only and would be regulated under the program to protect the quality of life within neighborhoods and the environment.*

establish a licensing process that provides a legal pathway for regulated and permitted cannabis businesses to operate in compliance with the LACC and State law in unincorporated Los Angeles County. Non-compliant businesses would be prohibited.

The proposed Project would amend the following sections of the LACC to allow cannabis businesses subject to specific regulations:

- Proposed Amendments to LACC Title 8 (Consumer Protection Business and Wage Regulations). Title 8 sets forth County regulations for certain businesses and activities. The proposed Project would amend Title 8 to require a license for any cannabis business subject to all applicable State and local regulations. Licensed cannabis businesses would be subject to operating requirements to protect public health, as well as annual renewal and monitoring requirements to ensure all cannabis businesses comply with local and State regulations. The proposed Project would also amend Title 8 to create social equity criteria to support and prioritize potential cannabis business owners that were adversely affected by cannabis prohibition and the "war on drugs," which disproportionately and adversely impacted communities of color.
- Proposed Amendments to LACC Title 22 (Planning and Zoning). Title 22 regulates land use and development by establishing the permissible uses of land based on the purposes

---

and objectives of a given zone (e.g., industrial, commercial, agricultural, or residential). The County's adopted zoning map identifies the geographical locations of zones. Title 22 also sets forth regulations for signage, lighting, noise, parking, landscaping, and other standards that pertain to the developmental and operational features of each land use. The proposed Project would amend Title 22 to:

- Specify the types of commercial cannabis activities that would be allowed or prohibited in each zone;
- Establish required buffers from specified sensitive uses;
- Enact land use regulations for each cannabis business type; and
- Require approval of a Site Plan Review (a type of ministerial zoning permit) as a mandatory component of each cannabis business license.

Cannabis business licenses would be subject to all applicable LACC regulations (e.g., cannabis odor control, waste disposal, and taxation) and General Plan/Local Coastal Program (LCP) policies. County cannabis business licenses and land use permits could be issued only to cannabis businesses proposed on sites that are zoned appropriately for cannabis business per Title 22 and meet all County requirements, including locational, structural, and operational requirements, as described below for each cannabis business type. (See *Proposed Areas Eligible for Cannabis Business Licensing*.)

The proposed Project would authorize the County to allow cannabis businesses only in constructed and permitted structures that are legal and conform to the LACC. Commercial cannabis businesses would be prohibited within the same structure or on the same lot as any legally established dwelling unit, including an accessory dwelling unit, junior accessory dwelling units, guest quarters, mobile home, or any other structure permitted for residential occupancy. Similarly, commercial cannabis businesses would be prohibited in nonconforming buildings or structures. The proposed Project would not permit the development of new buildings or the redevelopment of existing buildings to accommodate a proposed cannabis business. Any development or redevelopment associated with a potential cannabis business, or upgrades to comply with the LACC, would be subject to: (1) separate permitting and approval processes required under the existing LACC; and (2) consistency with policies of the General Plan/LCP. These separate permits, approvals, and/or policy consistency analyses would be required before cannabis business licenses could be issued.

All licensed cannabis businesses in the unincorporated county would be required to operate in compliance with the County and State license requirements at all times, including maintaining the premises free of trash, debris, or junk and salvage in exterior areas, except in designated trash collection containers and enclosures, as well as free of graffiti. No consumption of cannabis, cannabis products, or alcohol would be allowed on the premises of licensed commercial cannabis businesses. The sale and dispensing of alcoholic beverages or tobacco on the premises of a licensed commercial cannabis business would also be prohibited.

Banners, flags, and other portable signs would be prohibited in accordance with the requirements of LACC Chapter 22.114 (Signs). Cannabis business advertising would be prohibited: (1) on any interstate or State highway that crosses the California border; (2) within

residential and agricultural zones within the unincorporated areas of the County; and (3) within 1,000 feet of the premises of any youth-oriented use. This prohibition on cannabis business advertising would not apply to outdoor advertising signs located entirely on premises subject to a cannabis business license.

All commercial cannabis business licenses would be subject to mandatory annual renewal. Any business that does not comply with all County and State regulations would not be allowed to renew its license annually. Additionally, any change in location or ownership of a licensed cannabis business would require a new County land use permit and cannabis business license approval. All commercial cannabis businesses would be subject to review and inspection from law enforcement and other agents of the County charged with enforcement of LACC and any other State or local laws. The County OCM would oversee all cannabis business licensing activities with support from County departments, including but not limited to, the Department of Regional Planning (DRP) and the Department of Public Health.

The County Board of Supervisors has established initial limits on the number of cannabis business licenses available for each cannabis business type, as detailed below in *Proposed Allowable Cannabis Business Types*. The available licenses could only be issued for businesses within the proposed eligible areas in the unincorporated county, as described below in *Proposed Eligible Zones for Cannabis Business Permitting*. At the discretion of the Board of Supervisors, the number of available cannabis business licenses could increase over time to accommodate additional cannabis businesses in the unincorporated county; however, all cannabis businesses would be located only within eligible commercial/mixed-use, industrial, and institutional zones and subject to limitations on maximum concentrations within Supervisorial Districts and Planning Areas, as established in Chapter 5: *Planning Areas Framework*, of the County's General Plan. If a Planning Area extends across multiple Supervisorial Districts, the concentration limit shall apply separately within the portions of the Planning Area located in each respective Supervisorial District. If changes to Supervisorial District or Planning Area boundaries result in more than the concentration limit in a Planning Area, existing business shall be allowed to continue operating, subject to all other applicable laws, rules, and regulations.

### Proposed Allowable Cannabis Business Types

The proposed Project would allow commercial cultivation, manufacturing, distribution, testing, and retail sales of cannabis, subject to proposed County licensing and permitting limitations described for each business type below, as well as required State cannabis license requirements. The County would also permit cannabis microbusinesses, which combine at least three specific allowed business licenses into one small business. The proposed Project would not allow cannabis events.

The cannabis business types that would be allowed under the proposed Project are described below. Each cannabis business type would be allowed only in eligible commercial/mixed-use, industrial, and institutional zoning districts, as detailed below in *Proposed Areas Eligible for Cannabis Business Licensing*.

### *Cultivation*

Cannabis cultivation includes the planting, growing, and harvesting of cannabis plants. Cultivation would be permitted based on the type of lighting used and the number of plants or size of the cannabis canopy where flowering plants are grown. Cultivation also includes nursery operations, where the cannabis business grows clones, immature plants, seeds, or other types of cannabis used for propagation and processing activities, where the cannabis business only trims, sifts, cures, dries, grades, packages, or labels cannabis.

The proposed Project would permit cultivation only in eligible industrial zoning districts. Initially, the proposed Project would make 10 cannabis cultivation licenses available. A maximum of 50 percent of available licenses could be issued within the same General Plan Planning Area. Under the proposed Project, the County only would permit indoor cultivation. Indoor cultivation occurs only with artificial light and full suppression of natural light. Irrigation, dehumidifiers, and climate control equipment often are used to foster indoor plant germination and growth. Cannabis canopy size allowed for the cultivation business would be limited to no greater than 22,000 square feet. The proposed Project would prohibit all outdoor and mixed-light cultivation.

### *Manufacturing*

Cannabis manufacturing includes the compounding, blending, processing, extracting, infusing, or otherwise making or preparing of a cannabis product. There are two primary types of cannabis manufacturing based on the activities performed and the chemical(s) used for extraction and post-processing, as follows:

- Non-volatile manufacturing. Cannabis manufacturing involving only nonvolatile solvents in extraction or infusion processes (mechanical or otherwise). Examples of non-volatile solvents include carbon dioxide (CO<sub>2</sub>), ethanol, and nonhydrocarbon-based or other solvents such as water, vegetable glycerin, vegetable oil, animal fat, and glycerin.
- Volatile manufacturing. Cannabis manufacturing involves any solvent that is or produces a flammable gas or vapor that, when present in the air in sufficient quantities, will create explosive or ignitable mixtures. Examples of volatile solvents include but are not limited to butane, hexane, and propane.

Required manufacturing equipment varies depending on the process and can include machinery engineered specifically for extraction, such as closed-loop CO<sub>2</sub> extraction machines, distillation machines, rosin presses, and chromatography machines, to simple household appliances such as crockpots, ovens/stoves, and food processors or blenders. Additionally, manufacturers also use machinery to package products, such as capsule fillers. Following extraction, the products are then manufactured into tetrahydrocannabinol (THC) concentrates, edibles, topical products, and cartridges for vape pens for consumption.

The proposed Project would permit both volatile and non-volatile manufacturing only in eligible zoning districts. Non-volatile manufacturing would be allowed only in selected commercial and industrial zones. Volatile manufacturing would be allowed only in selected industrial zones. Initially, the proposed Project would make 10 cannabis manufacturing licenses

available. A maximum of 50 percent of available licenses could be issued within the same General Plan Planning Area.

### *Distribution*

Cannabis distribution includes the procurement, sale, and transport of cannabis and cannabis products between licensed cannabis businesses. A cannabis distributor also may provide ancillary storage of cannabis and cannabis products while in transport to the recipient.

The proposed Project would permit cannabis distribution businesses only in eligible commercial and industrial zones. Initially, the proposed Project would make 10 cannabis distribution licenses available. A maximum of 50 percent of available licenses could be issued within the same General Plan Planning Area. When a distributor only transports cannabis products between licensed commercial cannabis businesses (e.g., cannabis cultivators and storefront retail establishments) and does not require a building or premises to store or transfer cannabis products, the proposed Project would allow this cannabis distributor to operate in any zone where other commercial cannabis activities requiring distribution would be permissible.

### *Testing*

Cannabis testing consists of laboratory processes and measurements to ensure that cannabis and manufactured cannabis products meet quality assurance requirements and do not exceed regulatory limits for compounds such as THC, Cannabinol (CBN), and Cannabidiol (CBD). Once approved through the testing process, the cannabis product can be consumed legally.

The proposed Project would permit cannabis testing businesses only in eligible commercial/mixed-use, industrial, and institutional zoning districts. Initially, the proposed Project would make 10 cannabis testing licenses available. A maximum of 50 percent of available licenses could be issued within the same General Plan Planning Area.

### *Retail*

Cannabis retail businesses offer direct sales of cannabis and cannabis products to consumers.

There are two primary types of cannabis retail businesses based on the activities performed and sales model, as follows:

- Storefront retail. Cannabis storefront retail is a “brick and mortar” or dispensary model, where customers visit the retailer to shop and purchase cannabis and cannabis products.
- Non-storefront retail. Cannabis non-storefront retail is a delivery-only model, where customers shop and order online or by phone and the cannabis or cannabis products are delivered by the retailer to the customer.

The proposed Project would permit both storefront and non-storefront retail cannabis businesses only in eligible zoning districts, including selected commercial/mixed-use and industrial zones only. Cannabis retailers would be the only business type permitted in mixed-use zoning districts, and only when the proposed site for the cannabis retailer supports only commercial land uses and no residential uses. Initially, the proposed Project would make 50 cannabis retail licenses available, including 25 storefront retail and 25 non-storefront retail. A

maximum of 75 percent of available licenses could be issued within the same General Plan Planning Area. Additionally, the proposed Project would require cannabis retail businesses, including storefront and non-storefront, to be distributed equally between the five Supervisorial Districts in the county. If changes to Supervisorial District boundaries result in more than five cannabis retailers in a Supervisorial District, existing cannabis retailers would be allowed to continue operating, subject to all other applicable laws, rules, and regulations.

### *Microbusiness*

Under the proposed Project, cannabis microbusinesses would conduct at least three of the following small-scale cannabis activities at one location:

- Indoor cultivation with a maximum canopy size smaller than 10,000 square feet
- Non-volatile manufacturing
- Distribution
- Storefront retail sales
- Non-storefront retail sales

The proposed Project would permit cannabis microbusinesses only in eligible commercial and industrial zones. There is no proposed limit to cannabis microbusiness licenses allowed in the unincorporated areas of the County. However, each of the proposed small-scale cannabis activities comprising the microbusiness would require its own license, which would draw from the remaining available licenses for each business type.

### Proposed Areas Eligible for Cannabis Business Licensing

Under the proposed Project, all cannabis businesses would be required to identify a proposed site for the business that is zoned appropriately and located outside required buffers from specific existing uses, as described below. A cannabis business license would not be issued for a site that does not comply with all applicable regulations and requirements of the LACC and State law.

To view an interactive map depicting the zones of the unincorporated county in which commercial cannabis activities would be allowed and the prohibitive buffers that would exclude a site from eligibility, please visit: <https://tiny1.io/BYDV>.

### *Eligible Base Zoning by Cannabis Business Type*

Cannabis businesses would be permitted only in eligible commercial/mixed-use, industrial, and institutional zoning districts per Title 22 of the LACC. Cannabis businesses would be prohibited in all other zones, including all residential and agricultural zones, as well as mixed-use zones that have existing residential components.

Table 1 summarizes the eligible commercial zones by cannabis business type. Table 2 summarizes the eligible industrial and institutional zones by cannabis business type.

Table 1. Allowed Cannabis Business Types in Commercial Zones

Cannabis Business Type	Neighborhood Commercial (C-2)	General Commercial (C-3)	Commercial Manufacturing (C-M)	Mixed Use Commercial Only (MXD)
Cultivation	-	-	-	-
Distribution	-	-	Yes	-
Volatile Manufacturing	-	-	-	-
Non-Volatile Manufacturing	-	Yes	Yes	-
Testing	-	Yes	Yes	-
Retail, Storefront	Yes	Yes	Yes	Yes
Retail, Non-Storefront	Yes	Yes	Yes	Yes
Microbusinesses	-	-	Yes	-

Table 2. Allowed Cannabis Business Types in Industrial/Institutional Zones

Cannabis Business Type	Light Manufacturing (M-1)	Restricted Heavy Manufacturing (M-1.5)	Heavy Manufacturing (M-2)	Institutional (IT)
Cultivation	Yes	Yes	Yes	-
Distribution	Yes	Yes	Yes	-
Volatile Manufacturing	Yes	Yes	Yes	-
Non-Volatile Manufacturing	Yes	Yes	Yes	-
Testing	Yes	Yes	Yes	Yes
Retail, Storefront	Yes	-	-	-
Retail, Non-Storefront	Yes	Yes	Yes	-
Microbusiness	Yes	Yes	Yes	-

Additionally, within Specific Plan (SP) zoning per Chapter 22.400 of the LACC, cannabis businesses would be permitted only where the unique zones of the respective Specific Plan are similar to the proposed eligible commercial, industrial, and institutional base zones identified in Tables 1 and 2 above. Accordingly, the following eight Specific Plans contain eligible zones for at least one of the proposed allowable cannabis business types:

- East LA 3<sup>rd</sup> Street Specific Plan
- Connect Southwest Specific Plan
- Florence Firestone TOD Specific Plan
- Marina del Rey Specific Plan
- Newhall Ranch Specific Plan
- West Carson TOD Specific Plan
- Willowbrook TOD Specific Plan
- Northlake Specific Plan



In addition to the buffer requirements of California Business and Professions Code § 26054, the proposed Project would prohibit cannabis businesses as follows:

- No cannabis business may be located within 600 feet of a youth-oriented use, including public or private schools, child day care centers, public libraries, public parks, public recreational facilities, and licensed game arcades.
- No cannabis business may be located within 600 feet of a Drug Abuse and Recovery Treatment Center listed on the California Department of Health Care Services' official website.
- No cannabis business may be located on public lands or within the designated Significant Ecological Area (SEA).
- No storefront retail cannabis business may be located within 500 feet of another storefront retail cannabis business that either the County, another local jurisdiction, =and/or the State licenses.

A cannabis business that is legally established and continuously operates in compliance with the proposed County regulations and other local and State laws would not be affected by any new youth-oriented use, new drug abuse and recovery treatment center, or new storefront retail cannabis business subsequently located within these required buffers.

## ENVIRONMENTAL BASELINE

Baseline conditions are defined as the existing physical setting that may be affected by the project (CEQA Guidelines, § 15125[a]). This environmental setting constitutes the baseline physical conditions by which the County will determine whether impacts from the proposed Project and options are significant. The impacts of the proposed Project are defined as changes to the environmental setting or baseline attributable to the proposed Project.

As described above, commercial cannabis activities currently are prohibited within the unincorporated county; there are no legal cannabis businesses in the unincorporated county. Based on County law enforcement records and complaints received by DRP, as of August 2023, an estimated 138 illegal cannabis businesses were operating in the unincorporated county. Precise and reliable data on existing, illegal cannabis activities occurring in the county is difficult to obtain. Although reliable estimates cannot be determined at this point, at least some of the currently existing operations likely would be able to satisfy the requirements of the proposed Project and continue operating in their current or an alternative location.

Further, as described above, commercial cannabis activities only would be allowed in constructed and permitted structures located in commercial/mixed-use, industrial, and institutional zones. Consequently, commercial cannabis activities would replace existing businesses that currently occupy these sites or would occupy currently vacant (yet previously occupied and currently developed) properties. Public infrastructure and utilities (e.g., roadways, water systems, sewer systems, flood control infrastructure, energy infrastructure, and

telecommunications infrastructure), as well as public services (e.g., police, fire, schools, and libraries) currently serve the areas in which new cannabis businesses would be located.

# ENVIRONMENTAL IMPACT ANALYSIS

## I. Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code § 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Have a substantial adverse effect on a scenic vista?

Less than Significant Impact. A scenic vista is a viewpoint that provides views of a valued landscape for the benefit of the public. The proposed Project would not have a substantial adverse effect on a scenic vista because licensed cannabis businesses would be located only in constructed and permitted structures within existing commercial/mixed-use, institutional, and industrial zones in the unincorporated county. These areas are generally developed with structures, parking lots, storage areas, and other related uses, in retail commercial strip malls or shopping centers, warehousing, and industrial areas along arterial roadways, boulevards, or large urban streets. Cannabis activities would be located entirely within constructed and permitted structures, which means that licensed cannabis businesses would not result in new development. Further, exterior structural changes would be limited to new signage and, if needed, lighting, landscaping, and other minor modifications that would be subject to existing County regulations (e.g., LACC Chapter 22.114 [Signs] and § 22.112.080.H [Parking Lot Lighting]),

---

as well as proposed new regulations specifically for cannabis operations (e.g., additional limitations on the location of advertisements for cannabis). The proposed Project would not directly result in or facilitate any new development within the unincorporated county and, therefore, would not have the potential to adversely affect views of or from a scenic vista. Further, given that the proposed Project would require commercial cannabis activities to be located within constructed and permitted structures, the potential for substantial changes to the existing visual characteristics of the site would be nominal (e.g., new landscaping and signage) and would not introduce substantial new physical development that could adversely affect a scenic vista. Therefore, impacts would be less than significant.

b. Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?

Less than Significant Impact. Los Angeles County is a visually diverse region containing both densely populated urbanized areas and rural or suburban communities. Many different public trails within the county support hiking, mountain biking, horseback riding, and/or combination of these activities. These trails exist throughout the unincorporated area but are predominately located within the open space areas of the county such as the San Gabriel and Santa Monica mountains, Topanga Canyon, Rivas Canyon, Santa Fe Dam Open Space, and Pico Canyon.

The proposed Project would permit cannabis businesses only in developed commercial/mixed-use, industrial, and institutional zones. No cannabis business would be permitted in open space areas or other recreational areas with public trails. Further, all cannabis businesses would be prohibited within 600 feet of public parks and recreation facilities and, as such, would not be visible from public open spaces or other areas with public recreational trails. Given the eligible zoning districts (e.g., commercial and industrial), cannabis business would not be permitted within visual corridors of designated scenic highways.

Where permitted, cannabis activities would be required to be located entirely within constructed and permitted structures. If needed, exterior site development would be limited to features such as new signage, lighting, and landscaping. Signage, lighting, landscaping, and other exterior features of commercial cannabis sites would be subject to existing and proposed County regulations to ensure compatibility with existing, surrounding commercial and/or industrial development, thereby avoiding any adverse visual impacts to public viewsheds from riding, hiking, or multi-use trails. Therefore, impacts on views from regional riding, hiking, or multi-use trails would be less than significant.

c. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

Less than Significant Impact. Scenic resources within the county include mountains, ridgelines, and open spaces. Scenic highways are designated within Los Angeles County, such as State Route (SR) 2 traversing the San Gabriel Mountains; however, there are no scenic routes designated through existing commercial, industrial, and institutional zones in the unincorporated county.

The proposed Project would permit cannabis businesses only in developed commercial/mixed-use, industrial, and institutional zones. No cannabis business would be permitted in open space areas or other recreational areas. Further, all cannabis businesses would be prohibited within

---

600 feet of public parks and recreation facilities and, as such, would not damage scenic resources. Based on eligible zoning districts, cannabis business would not be permitted within visual corridors of designated scenic highways.

Where permitted, cannabis activities would be required to be located entirely within constructed and permitted structures and, therefore, would not damage scenic resources such as trees and rock outcroppings. If needed, exterior site alterations would be limited to features such as new signage, lighting, and landscaping. Exterior features of commercial cannabis sites would be subject to existing and proposed County regulations to ensure compatibility with existing surrounding commercial and/or industrial development, thereby avoiding any adverse visual impacts on scenic resources. Additionally, since the proposed Project would permit cannabis businesses only within constructed and permitted structures and only limited exterior modifications could occur according to existing County regulations (e.g., limitations on lighting, the location of cannabis signage, and prohibitions on new development that could compromise the integrity of historical buildings), there would be no potential for substantial impacts to views of historic resources. (See also, Section V. *Cultural Resources*.) Therefore, impacts on scenic resources would be less than significant.

- d. Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage points.)

Less than Significant Impact. The proposed Project would not directly result in, or facilitate substantial new, physical development within the unincorporated areas of the county. Licensed cannabis businesses could only occur in constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones in the unincorporated county. The proposed Project would not result in substantial alteration of a site or its characteristics given that all commercial cannabis activities would be located entirely in existing buildings. The proposed Project could result in minor modifications in outdoor areas of commercial cannabis sites; however, all exterior modifications to cannabis business properties would be subject to new and existing regulations included in applicable Community Plans, Specific Plans, and the LACC. Existing and proposed regulations would ensure any new site alterations associated with the proposed Project would be compatible with existing commercial/mixed-use, industrial, and/or institutional development and the visual character of the site and surrounding areas. Therefore, impacts would be less than significant.

- e. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact. Under the proposed Project, all commercial cannabis activities would be required to be located within existing buildings. As a result, all lighting, including artificial lights for indoor cultivation, would not be visible from exterior areas or public spaces. Specifically, mixed-light cannabis cultivation (e.g., cultivation in greenhouses using passive solar and artificial lighting) would be prohibited and, therefore, there is no potential for artificial lighting spillover from cannabis cultivation operations. As cannabis businesses would be

required to locate in existing buildings, it is reasonable that no changes to exterior lighting would be needed in many cases; however, if changes to exterior lighting are required for a cannabis business, all exterior lighting would be subject to existing lighting regulations of the LACC (e.g., § 22.410.090.B.2 [East Los Angeles Third Street Form-Based Code Specific Plan General Standards for Transect Zones, Outdoor Lighting] and § 22.112.080.H [Parking Lot Lighting]). Therefore, new exterior lighting would not generate new sources of substantial light or glare which would adversely affect day- or nighttime views in the vicinity of commercial cannabis sites and impacts would be less than significant.

## II. Agriculture and Forestry

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.</p> <p>Would the project:</p>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220[g]), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104[g])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact Cannabis businesses would be prohibited in all agricultural zones. In addition, cannabis activities would be allowed only within constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones, and would not be located within proximity to agricultural activities on protected soils or farmlands. Therefore, the proposed Project would not convert protected soils or farmland to non-agricultural uses, and no impacts would occur.

b. Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?

No Impact Cannabis businesses would be prohibited in all agricultural zones. The proposed Project would not result in new physical development located on, or which could affect any, Williamson Act land, nor conflict with existing agricultural zoning. Commercial cannabis activities would be prohibited on lands with an agricultural zoning designation. Therefore, no impacts related to conflicts with agricultural zoning, a designated Agricultural Resource Area, or lands subject to a Williamson Act contract are anticipated to occur.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220[g]), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104[g])?

No Impact. The LACC does not contain zones specifically for forest use or production of forest resources, and forest use is not specified as a permitted use in any of the County's agricultural zones. The proposed Project would restrict commercial cannabis operations to parcels in commercial/mixed-use, institutional, and industrial zones, and on sites that are already developed with buildings that can accommodate the new uses. Therefore, the proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. No impacts would occur.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The proposed Project would restrict commercial cannabis operations to parcels in commercial/mixed-use, institutional, and industrial zones, and on sites that are already developed with buildings that can accommodate permitted cannabis businesses. Proposed

commercial cannabis activities would be prohibited in all other zones within the unincorporated county, including lands with an agricultural zoning designation or lands zoned for forests, timberland, or Timberland Production. Therefore, the proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, or convert forest land to non-forest use. No impacts would occur.

- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Permitted commercial cannabis operations under the proposed Project could only occur in constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones in the unincorporated county. Commercial cannabis operations would be prohibited on, and would not be located within proximity to, agricultural lands. Therefore, the proposed Project would not result in the conversion of agricultural lands to non-agricultural use or forest land to non-forest use. No impacts would occur.

### III. Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a. Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a. Conflict with or obstruct implementation of applicable air quality plans of either the South Coast Air Quality Management District (SCAQMD) or the Antelope Valley Air Quality Management District (AVAQMD)?



---

Potentially Significant Impact. The AVAQMD and SCAQMD are responsible for formulating and implementing air pollution control strategies in Los Angeles County. The AVAQMD is the local agency with the primary responsibility for the control of non-vehicular sources of air pollution throughout the Antelope Valley area of the county and the respective portion of the Mojave Desert Air Basin (MDAB), while SCAQMD is the local agency with the primary responsibility for control of non-vehicular sources of air pollution throughout the remainder of the county and the greater South Coast Air Basin (SCAB).

The proposed Project would establish regulations to license and permit commercial cannabis activities and businesses, including the cultivation, manufacturing, transportation, distribution, testing, and sale of cannabis in the unincorporated areas of the county in the AVAQMD and SCAQMD. The proposed Project would not result in substantial, new physical development; only minor interior and exterior site improvements (e.g., new signage and lighting) would potentially occur to support cannabis businesses within constructed and permitted structures. Therefore, the proposed Project would not have the potential to result in significant new construction-related criteria air pollutant emissions.

Operation of cannabis businesses could cause potential impacts on air quality due to potential conflicts with, or obstruction of, the implementation of applicable air quality plans resulting from increased vehicle trips, increased energy and water usage from constructed and permitted structures transitioning into cannabis businesses, and the use of volatile chemicals in manufacturing activities. Therefore, impacts would be potentially significant and this issue will be further analyzed in the EIR.

- b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment status under an applicable federal or State ambient air quality standard?

Potentially Significant Impact. Los Angeles County is characterized by relatively poor air quality. Federal and State air quality standards often are exceeded in portions of the county. The county currently is designated as being in non-attainment of federal air quality standards for lead, 8-hour ozone (O<sub>3</sub>), and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>).<sup>6</sup> Additionally, the county is designated as being in non-attainment of State air quality standards for O<sub>3</sub> and particulate matter less than 10 microns in diameter (PM<sub>10</sub>). The proposed Project would result in only limited interior and exterior physical site alterations (e.g., signage and lighting), as cannabis businesses would be permitted only within constructed and permitted structures. The proposed Project would not have the potential to generate significant new construction-related criteria air pollutant emissions. However, the operation of cannabis businesses could cause potential impacts on air quality through increased vehicle trips in the area and increased energy and water usage from constructed and permitted structures transitioning into cannabis businesses. These operational emissions have the potential to represent a cumulatively considerable net increase in lead, ozone, PM<sub>2.5</sub>, and PM<sub>10</sub>, for which

---

<sup>6</sup> U.S. Environmental Protection Agency (USEPA) Greenbook. 2024. Current Nonattainment Counties for All Criteria Pollutants. <https://www3.epa.gov/airquality/greenbook/ancl.html>.

SCAQMD and AVAQMD are designated non-attainment for all or some of these criteria pollutants. Therefore, impacts regarding criteria pollutant emissions would be potentially significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors are people in the population who are particularly susceptible to health effects due to exposure to an air contaminant.<sup>7</sup> Land uses where sensitive receptors are typically located could include youth-oriented uses, rehabilitation centers, hospitals, residences, parks and playgrounds, and schools. Any emissions from potential site alterations occurring as an indirect result of the proposed Project would be limited (e.g., installation of security lighting, signage, and landscaping), and would not involve construction activities that expose sensitive receptors to substantial pollutant concentrations. Cannabis business activities would exclusively take place in commercial/mixed, industrial, and institutional zones and would be located at least 600 feet from youth-oriented uses and Drug Abuse and Recovery Treatment Centers pursuant to the proposed Title 22 ordinance amendments. However, the precise location of cannabis operations within the zones in which they would be allowed is unknown and, consequently, their location relative to sensitive receptors is unknown at this time. Further, cannabis operations could produce new traffic along roadways that experience traffic congestion and expose sensitive receptors to new, or exacerbate existing, localized pollutant concentrations ("hotspots"). Therefore, impacts on air quality sensitive receptors are potentially significant.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Potentially Significant Impact. Other emissions, such as those leading to odors, are typically associated with industrial development involving the use of chemicals, solvents, petroleum products, and/or other strong-smelling elements used in manufacturing processes. Odors also are associated with uses such as sewage treatment facilities and landfills.

Cannabis cultivation and, to a lesser degree, manufacturing, are often accompanied by strong odors. Odors can vary by variety, ranging from pepper, balsamic vinegar, pine, citrus, and skunk. The type and potency of cannabis odors range widely from variety to variety, as do receptors' opinions regarding whether the odor is pleasant or objectionable. Most of the pungent aromas of cannabis come from a class of chemicals called terpenes. Terpenes are among the most common compounds produced by flowering plants; they vary widely between plants and are responsible for the fragrance of nearly all flowers. Cannabis produces over 140 different terpenes. These terpenes are found in varying concentrations in different cannabis varieties. THC, the cannabinoid primarily responsible for cannabis' psychoactive effects, does not emit odor.

---

<sup>7</sup> SCAQMD. Sensitive Receptors. <https://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/chapter-2---air-quality-issues-regarding-land-use.pdf#:~:text=A%20sensitive%20receptor%20is%20a%20person%20in%20the.effects%20due%20to%20expo,sure%20to%20an%20air%20contaminant.>

The SCAQMD and AVAQMD have adopted rules for controlling nuisance emissions, such as those leading to odors from community sources. SCAQMD and AVAQMD Rule 402 prohibits emissions that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public. The SCAQMD and AVAQMD also regulate the volatile organic compound (VOC) content of architectural coatings and solvents via several adopted rules including Rules 442, 1107, 1113, and 1171. Both the SCAQMD and AVAQMD have also established programs for receiving and investigating public complaints of businesses that discharge air contaminants that cause injury, nuisance, or annoyance to any considerable number of persons or the public, or discharge air contaminants that endanger the comfort, health, or safety of such persons. Pursuant to the authority established by these rules, the SCAQMD and AVAQMD may require a business to take action to correct a violation.

The proposed Project could involve minor site alterations (e.g., installation of security lighting, landscaping, and external painting) to accommodate cannabis business but would not generate long-term odor impacts. Any potential odors from the storage, cultivation, and/or manufacturing of cannabis would also be minimal due to activities being exclusively indoors. Further, future cannabis operations would be required to comply with Chapter 11.37 of the LACC which currently requires any business applying for a public health permit for a cannabis facility to submit an Odor Management Plan that prevents odors from the cannabis facility from being detected by a person outside of the facility or indoor cultivation site. While the proposed Project is not expected to increase the exposure of people to emissions or odors, impacts are conservatively considered to be potentially significant and will be evaluated further in the EIR.

## IV. Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Convert oak woodlands (as defined by the State, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (LACC, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (LACC, Title 22, Ch. 22.174), the SEAs (LACC, Title 22, Ch. 102), Specific Plans (LACC, Title 22, Ch. 22.46), Community Standards Districts (LACC, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved State, regional, or local habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?
- b. Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations, or by CDFW or USFWS?

No Impact. Commercial cannabis activities would not be permissible within proximity to habitat or natural communities supporting sensitive species identified in local or regional plans, policies, or regulations (e.g., regulations that CDFW and/or the USFWS enforces). Commercial cannabis activities would be limited to the constructed and permitted structures located in eligible commercial/mixed-use, industrial, and institutional zones of the county that are developed and do not exhibit the presence of candidate, sensitive, and/or special status species or habitat on which they rely. Although some limited commercial areas may border undeveloped open space regions such as the Santa Monica or San Gabriel Mountains, or key aquatic resources such as the Ballona Wetlands or portions of the Los Angeles River, cannabis activities would be located within existing buildings and most eligible areas are typically located within existing development. In addition, any site alterations occurring as an indirect result of the proposed Project would be limited (e.g., installation of security lighting, outdoor façade treatments, landscaping, and/or signage) and would not involve significant changes to outdoor areas. Further, commercial cannabis activities would be prohibited in any area identified as an SEA, as well as on public lands. Finally, cannabis businesses would be subject to policies included in the General Plan/Local Coastal Program, as well as other federal, State, and local regulations regarding sensitive natural communities.

Given that the proposed Project would restrict cannabis activities to constructed and permitted structures and sites in developed areas of the county, would not involve any significant construction or site improvements, and would prohibit cannabis activities in areas designated as SEAs, the proposed Project would not create a significant impact to candidate, sensitive, and/or special status species and their habitats, and/or sensitive natural communities. No impacts would occur as a result of the proposed Project.

- c. Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Commercial cannabis activities would not adversely affect federally protected wetlands, including marshes, vernal pools, or coastal regions. Commercial cannabis activities would be limited to the constructed and permitted structures located in eligible commercial/mixed-use, industrial, and institutional zones of the county which are substantially developed. Although some limited commercial areas may border undeveloped open space or more natural areas such as the Ballona Wetlands or portions of the Los Angeles River which support wetland habitats, eligible zoning districts are located within existing development and do not comprise significant sensitive resources. In addition, the potential for physical alternations of a constructed and permitted structure permitted for a cannabis business would be limited (e.g., installation of security lighting, outdoor façade treatments, landscaping, and/or signage), and would not involve construction or significant changes to outdoor areas. No impacts would occur as a result of the proposed Project.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

---

No Impact. Commercial cannabis activities would not disrupt any habitat corridors or affect the movement of any resident or migratory wildlife. Licensed cannabis businesses would occur entirely indoors, within constructed and permitted structures on commercial/mixed-use, industrial, and institutionally zoned land. Site alterations resulting from the proposed Project (e.g., interior remodeling, landscaping, and/or signage) would be limited to previously developed areas. Any site alterations that are required to comply with permitting requirements (e.g., improvements to fencing or security lighting) would be subject to applicable standards of the LACC, which are designed to protect the movement of wildlife. Given that the proposed Project would not expand development into currently undeveloped areas, no impact on migratory wildlife species or corridors would occur as a result of the proposed Project.

- e. Convert oak woodlands (as defined by the State, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?

No Impact. The proposed Project would permit commercial cannabis activities only within constructed and permitted structures on developed sites. Any site alterations occurring as an indirect result of the proposed Project would be limited (e.g., installation of security lighting, outdoor façade treatments, landscaping, and/or signage) and would not involve substantial construction in, or significant changes to, outdoor areas. As a result, the proposed Project would not directly result in the conversion of any native woodlands. However, if any minor site improvements are required to satisfy permitting requirements, such as improvements to fencing or security lighting, improvements would be subject to applicable standards of the LACC designed to protect native or locally important trees and vegetation. For instance, proposed cannabis activities that involve development within proximity to oak trees would be required to comply with Chapter 22.174 (Oak Tree Ordinance) of the LACC, which sets forth requirements for the evaluation, protection, relocation, or replacement of protected oak trees. Therefore, no impacts are anticipated.

- f. Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (LACC, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (LACC, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (LACC, Title 22, Ch. 102), Specific Plans (LACC, Title 22, Ch. 22.46), Community Standards Districts (LACC, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?

No Impact. The proposed Project would not involve or directly result in any physical improvements or site development. Commercial cannabis activities would be permitted only within constructed and permitted structures on eligible commercial, mixed-use, industrial, and institutional-zoned lands. Commercial cannabis activities would be prohibited within SEAs defined in Chapter 22.102 of the LACC. To be licensed, a commercial cannabis business would be required to comply with all existing, applicable regulations of the LACC, including, but not limited to, the Oak Tree Ordinance and additional standards of the applicable Specific Plan and/or Community Standards District. Therefore, no impacts would occur as a result of the proposed Project.

- g. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved State, regional, or local habitat conservation plan?

No Impact. None of the eligible areas in which permitted cannabis activities could occur are subject to a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved State, regional, or local habitat conservation plan. Future cannabis operations would be limited to commercial/mixed-use, industrial, and institutional zones, and within constructed and permitted structures, and would involve limited site modifications (e.g., interior remodeling, landscaping, signage, and/or painting). Therefore, the proposed Project would not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved State, regional, or local habitat conservation plan, and no impacts would occur.

## V. Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?

Less than Significant Impact. Commercial cannabis activities would be required to be located in constructed and permitted structures in commercial/mixed-use, institutional, and industrial zones within the county and would result in limited physical site alterations (e.g., interior remodeling, landscaping, signage, and/or painting). In the unlikely event that a constructed and permitted structure proposed for cannabis use is a designated historic site, any permitted cannabis uses would be required to comply with Chapter 22.124 (Historic Preservation) of the

---

LACC which requires properties to verify building designs and potential activities do not conflict with or alter any historic resources.<sup>8</sup> Therefore, impacts would be less than significant.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?

No Impact. Future cannabis businesses would be limited to existing commercial/mixed-use, industrial, and institutional zones and could involve minor site improvements such as interior remodeling, external painting, signage, lighting, and landscaping. However, the proposed Project would not permit construction or ground-disturbing activities that could potentially adversely affect known or unknown archaeological resources (e.g., grading and/or other ground disturbance activities in substrate that has not been previously disturbed). Therefore, there would be no impact on archaeological resources.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. Paleontological resources are buried fossil remains and unique geologic features including rock outcroppings, exposed geologic strata, geothermal vents, and petroleum deposits. Given that cannabis operations would be limited to existing developed lands, surficial and near-surface paleontological and other unique geological features are unlikely to be present; resources that might have existed in these areas most likely have been destroyed or recovered as a result of past development and redevelopment. Further, given that the proposed Project would permit cannabis activities only within constructed and permitted structures, the likelihood of disturbing any paleontological or other unique geological feature is extremely low. Therefore, the proposed Project would have no impacts regarding paleontological resources and/or unique geologic feature.

d. Disturb any human remains, including those interred outside of dedicated cemeteries?

No Impact. All cannabis businesses licensed as a result of the proposed Project would be located within constructed and permitted structures in previously disturbed areas of commercial/mixed-use, industrial, and institutional zones. The proposed Project would not permit construction or ground-disturbing activities that could potentially adversely affect known or unknown human remains, including those interred outside of dedicated cemeteries (e.g., grading and/or other ground disturbance activities in substrate that has not been previously disturbed). Therefore, there would be no impact on human remains.

---

<sup>8</sup> Los Angeles County Historic Preservation Ordinance. 2024. <https://planning.lacounty.gov/historic-preservation/>.



## VI. Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. The proposed Project would establish commercial cannabis activities as allowable uses within constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones. Potential future cannabis businesses would use energy for the cultivation, manufacturing, distribution, testing, and sales of cannabis and cannabis products (e.g., lighting and heating/cooling of buildings), and operation of personal or commercial vehicles. All cannabis businesses would be within existing buildings and would be required to comply with the County's energy efficiency standards and would comply with applicable lighting regulations of the LACC (e.g., § 22.410.090.B.2 [East Los Angeles Third Street Form-Based Code Specific Plan General Standards for Transect Zones, Outdoor Lighting] and § 22.112.080.H [Parking Lot Lighting]). Minor site alterations such as interior remodeling, signage, security lighting, and landscaping would not involve a significant amount of energy consumption. However, certain features of cannabis operations (e.g., indoor lighting, climate control systems, and odor control equipment for indoor cultivation) could result in substantial demands for energy resources and have potentially significant impacts.

b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The California Title 24 Building Code includes energy efficiency standards for development of all types, including efficiency standards for electrical and natural gas energy systems. Future commercial cannabis activities resulting from the proposed Project would be within existing buildings that either already comply with the Title 24 CALGreen standards, or if requiring modifications to accommodate a proposed commercial cannabis activity, would require to be modified to comply with Title 24 CALGreen standards. Implementing projects or actions also would be required to comply with the County's General Plan and Climate Action Plan, which include policies and requirements related to energy conservation, as well as the State DCC's application renewal requirements and renewable

energy requirements. Potential future cannabis businesses are not anticipated to conflict with State or local plans for renewable energy or energy efficiency because they would be operating within constructed and permitted structures and would not involve the development of new structures that would exceed the County’s thresholds for renewable energy. Therefore, impacts would be less than significant.

## VII. Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the Hillside Management Area Ordinance (LACC, Title 22, Ch.22.104)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map or known fault?

No Impact. Los Angeles County is seismically active given the existence of numerous faults in the region. The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) prohibits the development of structures for human occupancy across Holocene-active fault traces. Under this Act, the California Geological Survey (CGS) has established “Zones of Required Investigation” on either side of an active fault that delimits areas susceptible to surface fault rupture. The zones are referred to as Earthquake Fault Zones (EFZs) and are shown on CGS maps.<sup>9</sup> Surface rupture occurs when the ground surface is broken due to a fault movement during an earthquake; typically, these types of hazards occur within 50 feet of an active fault.

Commercial cannabis activities only would occur within constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones. The proposed Project would not introduce new development to areas subject to potential risk from the rupture of a known earthquake fault. Additionally, given that cannabis operations would be limited to constructed and permitted structures, only limited site modifications or improvements (e.g., external painting, security lighting, and/or landscaping) would occur under the proposed Project. Permitted structures must comply with, or be retrofitted to comply with, all federal, State, and local regulations regarding land use siting and fault rupture, including the national Uniform Building Code, the California Building Code (CBC), and applicable County ordinances relating to seismic retrofitting. Constructed and permitted structures would have also undergone structural evaluation prior to completion of construction, which would have included site-specific geotechnical investigations that evaluate the potential for seismic risk and identify appropriate mitigation measures. If not—and found to be non-compliant with current standards and/or regulations—commercial cannabis operators would be required to retrofit existing

<sup>9</sup> California Geologic Survey. 2024. Earthquake Zones of Required Investigation. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

buildings to comply with current regulations to accommodate a cannabis business operation. Therefore, no impact is anticipated related to the rupture of a known earthquake fault.

(ii) Strong seismic ground shaking?

No Impact. Los Angeles County is historically a seismically active region, typically averaging approximately 24 earthquakes per year with several faults that transect the unincorporated county.<sup>10</sup> The presence of these faults suggests that the county will continue to be subject to strong seismic ground shaking in the event of an earthquake in the region. All constructed and permitted structures to be potentially utilized as a cannabis business would be subject to the standards and requirements included in the most current version of the CBC and the County of Los Angeles Building Code (which is derived from the CBC). Geotechnical design criteria are incorporated into a geotechnical review to ensure structures can withstand potential ground shaking from regional fault sources. Given that the proposed Project would not result in any major construction and permitted structures would be required to comply with applicable building code regulations, no impacts are anticipated.

(iii) Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a phenomenon in which unconsolidated, water-saturated sediments become unstable due to the effects of strong seismic shaking. During an earthquake, these sediments can behave like a liquid, potentially causing severe damage to structures located above them. Lateral spreading is a variety of minor landslides that occur when unconsolidated liquefiable material breaks and spreads due to the effects of gravity, usually down gentle slopes. The potentially damaging effects of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving and cracking of structure slabs due to sand boiling, and buckling of deep foundations. Dynamic settlement (i.e., pronounced consolidation and settlement from seismic shaking) may also occur in loose, dry sands above the water table, resulting in settlement of, and possible damage to, structures.

The proposed Project would not involve the construction of new buildings given that potential future cannabis operations would take place within constructed and permitted structures. Therefore, grading and engineering building foundations and other features to withstand liquefaction are unlikely to be required to facilitate cannabis businesses resulting from the proposed Project. Constructed and permitted structures in which cannabis operations could be located must be compliant, or be modified to be compliant, with all applicable State and County regulations and building codes, which could involve geotechnical review. Therefore, no impacts are anticipated.

(iv) Landslides?

No Impact. Landslides are one of the various types of downslope movements in which rock, soil, and other debris are displaced due to the effects of gravity. The potential for material to detach

---

<sup>10</sup> Los Angeles Earthquake Report. 2024 <https://earthquake.gov/usa/california/los-angeles/#:~:text=A%20total%20of%20233%20earthquakes%20with%20a%20magnitude,23%20earthquakes%20per%20year%2C%20or%201%20per%20month.>

---

and move downslope depends on multiple factors including the type of material, water content, and steepness of terrain. The proposed Project would not result in the construction of new buildings and potential future cannabis operations would take place within constructed and permitted structures. If any of the constructed and permitted structures do not meet the County's building codes, these structures would be subject to geotechnical review before operation. Therefore, the proposed Project would not cause substantial adverse effects, including the risk of loss, injury, or death involving landslides and no impacts are anticipated.

b. Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Any site alterations resulting from the proposed Project would involve limited improvements to existing sites (e.g., landscaping, outdoor façade treatments, and interior remodeling). Given that the operation of cannabis businesses would be within constructed and permitted structures and on previously developed properties, substantial earth-moving activities such as clearing, excavation, and grading are unlikely to occur. If needed, ground disturbance would be limited to minor earthwork for the installation of amenities such as new landscaping, resurfacing for parking areas, trenching for lighting and utilities, and/or installation of freestanding signs. Although unlikely to occur, if substantial ground disturbance activities are required, redevelopment of cannabis sites would be subject to the requirements of the LACC Title 26, Building Code, Appendix J - Grading (§ J101.7 - Stormwater control measures), and the National Pollutant Discharge and Elimination System (NPDES) General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities Order 2012-0006-DWQ (Construction General Permit), which require protection of adjacent water courses and public or private property from damage by erosion, flooding, and deposition of mud, debris, and construction-related pollutants originating from the site during grading and related construction activities. Therefore, the proposed Project would not result in substantial erosion or loss of topsoil, and less than significant impacts are anticipated.

c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

No Impact. Given that cannabis businesses would be required to occupy previously developed lots and existing buildings, there would be no potential for new building development on an unstable geologic unit and, consequently, no required geotechnical evaluation for potential hazards. Any constructed and permitted structures that were built after the adoption of current building code requirements and would be occupied by a future cannabis business would have been built in compliance with applicable building standards. If a building pre-dates the adoption of the current building code and a building and/or grading permit is needed to allow a proposed cannabis business to occupy the building, the site may be subject to independent project-specific geotechnical review and the issuance of building and/or grading permits before cannabis business licensing could occur. If the existing building does not comply with existing regulations regarding the ability of the structure to withstand geologic hazards, then retrofits to the existing building to comply with applicable requirements of the LACC would be required before cannabis business licensing could occur (e.g., Building Code Appendix J, § J104.2.3, which requires geotechnical design criteria are incorporated to verify the stability of nearby slopes and

---

soils and to provide recommendations to protect developments from causing or being affected by liquefaction, lateral spreading, landslides, and subsidence). Given that all of the constructed and permitted structures proposed for cannabis activities under the proposed Project must comply with existing building codes, no impacts are anticipated.

- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact. Expansive soils are soils that possess a “shrink-swell” characteristic. Shrink-swell is the cyclic change in volume (i.e., expansion and contraction) that occurs in fine-grained clay sediments from the process of wetting and drying; the volume change is reported as a percent change for the whole soil.

While a future cannabis business could be in an area that is underlain by expansive soils, the proposed Project would permit cannabis businesses only within existing commercial, industrial, and institutional areas, on sites that either have already undergone geotechnical review or would be required to do so if substantial new structural development must occur prior to cannabis business licensing. The LACC Building Code (Appendix J, § J104.2.3) requires geotechnical reviews that involve soil testing to identify the presence of a variety of geotechnical constraints related to soil quality, including the expansion potential of the soil. Given that all constructed and permitted structures must comply with existing building codes—including geotechnical specifications—no impacts related to expansive soils are anticipated.

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Less than Significant Impact. Future cannabis operations would occupy constructed and permitted structures on existing developed lots and would involve relatively limited new construction (e.g., landscaping, interior remodels, and installation of signage). It is unknown which specific sites would be occupied by a cannabis business and, consequently, if cannabis businesses would rely on private septic tanks or alternative on-site wastewater disposal systems versus a public sewer system for sewage disposal services. If a business operation proposes to use a private septic tank or alternative wastewater disposal system, the business operator would be required to demonstrate that the proposed method of sewage disposal complies with environmental health and building code requirements that apply to the proposed method of sewage disposal (e.g., LACC Title 28 - Plumbing Code, Chapter 7 - Sanitary Drainage). New septic tanks or alternative wastewater disposal systems would be required to comply with current standards to ensure that adequate soils, percolation rates, and capacity exist to support the proposed cannabis business operation. Further, pursuant to LACC, Title 28, § 101.3.3, if the Chief Plumbing Inspector determines that an existing septic tank or alternative wastewater disposal system is dangerous, unsafe, unsanitary, or a nuisance and a menace to life, health, or property, the business operator would be required to alter or replace the existing system pursuant to the requirements of the LACC. Finally, cannabis cultivation relies upon recycled water systems and would not generate substantial increases in the loading of wastewater treatment systems. Therefore, the proposed Project would generate less than significant impacts.

- f. Conflict with the Hillside Management Area (HMA) Ordinance (LACC, Title 22, Ch.22.104)?

Less than Significant Impact. The HMA Ordinance is a component of the County General Plan that is designed to preserve significant physical features in hillside areas. HMAs are defined as areas with slopes of 25 percent or greater which are not artificially created. Compliance with the Hillside Design Guidelines is required for development in HMAs, unless exempted under the HMA Ordinance provisions. In hillside areas with less than 25 percent slope, use of the Hillside Design Guidelines is optional, but encouraged. These guidelines include specific and measurable design techniques that can be applied to residential, commercial, industrial, and other types of projects to ensure physical features of hillside areas are preserved.

The proposed Project would not result in the construction of new buildings and only minor site alterations would occur (e.g., landscaping, security lighting, signage, and outdoor façade treatments). If an existing building is within an HMA-designated area and is proposed to be occupied by a cannabis business, the building would have already been designed pursuant to the HMA Ordinance and Hillside Design Guidelines if developed after the adoption of these requirements and any new development would be subject to the HMA Ordinance. As such, the proposed Project would generate less than significant impacts.

## VIII. Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. GHGs can be generated during the cultivation, manufacturing, and wholesale of cannabis and cannabis products through the use of energy resources and the operation of personal or commercial vehicles. Future commercial cannabis activities may expand, generate, and emit GHGs through the use of energy resources (i.e., electrical equipment and machinery), operation of vehicles for the transport of commercial cannabis products and equipment, as well as employees, suppliers, and customers traveling to and from a commercial cannabis operation. New development associated with cannabis operations would be subject to Title 31 (Chapter 5, Nonresidential Mandatory Measures and, depending on the size of the development, Appendix A5) of the LACC (Green Building Standards Code). Additionally,

cannabis activities would be within previously disturbed areas and would not likely exceed the GHG emissions of businesses that currently occupy properties on which future cannabis businesses could be located. Nevertheless, the operation of cannabis businesses still has the potential to emit GHG emissions that may have an impact on the environment and, therefore, impacts related to GHG emissions are potentially significant.

- b. Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. The California Title 24 CALGreen standards include energy efficiency standards for all types of development, including electricity and natural gas. The proposed Project would require cannabis businesses to comply with the California Title 24 CALGreen standards. In addition, future cannabis operations that involve new physical development would be subject to the LACC Title 31 (Chapter 5, Nonresidential Mandatory Measures and, depending on the size of the development, Appendix A5) requirements for green buildings and the County's General Plan and 2045 Climate Action Plan, which include policies and requirements related to energy conservation. Further, future cannabis businesses would be subject to State DCC regulations including licensing renewal and standard operating requirements, which require applicants to provide information regarding the proposed activities energy demands and electricity GHG intensity and, in some cases, requirements for obtaining carbon emission offsets. Nevertheless, the operation of cannabis businesses would result in GHG emissions (directly and/or indirectly) that have the potential to conflict with State or local plans for renewable energy or energy efficiency. Impacts would be potentially significant.

## IX. Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:				
i) within a high fire hazard area with inadequate access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) within an area with inadequate water and pressure to meet fire flow standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) within proximity to land uses that have the potential for dangerous fire hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Does the proposed use constitute a potentially dangerous fire hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?

Potentially Significant Impact. For commercial cannabis activities, typical hazardous materials may include fuels, solvents, paints, oils, grease, fertilizers, and pesticides, as well as volatile and flammable gases and liquids used in manufacturing. Although cannabis activities do not typically require large quantities of these materials, commercial cannabis activities would involve at least some transportation, storage, and disposal of such materials depending on the specific cannabis activity that a cannabis business conducts.

---

Under the proposed Title 22 ordinance amendments, commercial cannabis activities that include public sales would be setback a minimum of 600 feet from youth-oriented uses, 600 feet from Drug Abuse and Recovery Treatment Centers, and 500 feet from other cannabis storefront retail activities, reducing the potential for exposure of certain sensitive receptors to hazards and hazardous material, as well as reducing the potential for the concentration of potentially hazardous cannabis-related activities to a defined area. In addition, the U.S. Department of Transportation (USDOT), Caltrans, and the California Highway Patrol (CHP) regulate the transportation of hazardous materials. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of the release of hazardous materials. The proposed Project would not result in the construction or demolition of any structures or uses and any site alterations for cannabis businesses would be limited (e.g., landscaping, signage, façade treatments, and/or security lighting). However, since cannabis businesses would potentially transport, store, use, and dispose of hazardous materials, impacts would be potentially significant.

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

Potentially Significant Impact. The Los Angeles County Fire Department (LACoFD) is the local Certified Unified Program Agency (CUPA) and hazardous materials response team for events involving the release of hazardous materials or waste into the environment. Commercial cannabis activities typically involve the use of hazardous materials including fuels, solvents, paints, oils, grease, and fertilizers, as well as volatile and flammable gases and liquids used in manufacturing. Under the proposed Project, cannabis businesses would be required to obtain and operate pursuant to a State license that would require operators to handle all hazardous materials and/or waste in compliance with all applicable hazardous waste statutes and regulations.

Although the use, transportation, storage, or disposal of such materials are not expected to pose a significant threat to the public given the typical amount of such materials required for a cannabis operation and mandatory compliance with existing regulations as part of the State licensing process, improper storage, handling, or disposal of such materials can result in the release of such materials to the environment. Accordingly, the proposed Project would have a potentially significant impact.

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?

Potentially Significant Impact. Potentially hazardous activities that may occur during cannabis cultivation or manufacturing could include the use, storage, transport, or discharge of hazardous materials, such as petroleum products, solvents, pesticides, herbicides, and fertilizers. The proposed Project would allow for volatile manufacturing processes within commercial/mixed-use, industrial, and institutional zones. Under the proposed Title 22 ordinance amendments, commercial cannabis activities would be setback a minimum of 600

feet from youth-oriented uses, 600 feet from Drug Abuse and Recovery Treatment Centers, and 500 feet from other cannabis storefront retail structures, reducing the potential for exposure to hazards and hazardous material, as well as reducing the potential for the concentration of potentially hazardous cannabis-related activities to a defined area. Further, all commercial cannabis activities eligible under the proposed Project would be required to comply with all applicable federal, State, and local policies and regulations related to the handling, use, storage, odor emissions, transport, or disposal of hazardous materials or waste. Given that the proposed Project could increase the handling, use, storage, transport, or disposal of hazardous materials or waste, impacts would be potentially significant.

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact. Although the proposed Project would allow cannabis businesses only in certain zones, it is currently unknown on which specific properties future cannabis businesses would be located. Eligible commercial cannabis businesses would be required to obtain a State cannabis license and comply with applicable federal, State, and local regulations related to siting of development on or near hazardous waste sites. For instance, applicants seeking a State license would be required to provide evidence that they completed a hazardous materials record search through the EnviroStor database to determine if a proposed cannabis business would be located on a hazardous materials site that is included on a list of hazardous materials sites. Where a hazardous site is encountered, protocols are implemented to ensure the protection of the health and safety of employees and workers. However, given that it is not feasible to determine where future cannabis businesses will be operating relative to hazardous materials sites, as well as the specific activities and site alterations that would be involved on any given site, impacts would be potentially significant.

- e. For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Less than Significant Impact. The proposed Project would allow for the operation of commercial cannabis activities within commercial/mixed-use, industrial, and institutional zones of the county, which exist in areas proximate to local airports such as the Los Angeles International Airport (LAX), Van Nuys Airport (VNY), Santa Monica Airport (SMO), Compton/Woodly Airport (CPM), and Hawthorne Municipal/Jack Northrop Field (HHR). Where commercial cannabis activities are located within or proposed to be near an eligible commercial or industrial zone within an airport land use zone, such use would be subject to the policies and regulations established by the respective airport land use plan as administered by the Los Angeles County Airport Land Use Commission (ALUC). The ALUC establishes an Airport Land Use Plan (ALUP) for each airport within the incorporated and unincorporated areas of the county, which includes policies to protect workers, employees, and visitors from airport/aircraft hazards. Any lighting or outdoor signage that has the potential to disrupt airways would be prohibited pursuant to regulations of the LACC (e.g., Chapter 22.114 [Signs] and Section 22.112.080.H [Parking Lot Lighting]), as well as proposed new regulations specifically for cannabis

operations (e.g., additional limitations on the location of advertisements for cannabis). As existing and future uses subject to the proposed Project would be required to comply with the policies and development requirements of the ALUP and LACC, impacts would be less than significant.

- f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

No Impact. The County Land Use and Safety Elements include goals and policies to increase accessibility to information about emergency response and access. The proposed Project would not involve new construction that would impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Cannabis businesses would be located in existing buildings thereby limiting the amount of new physical development that may occur as an indirect result of the proposed Project (e.g., exterior painting, security lighting, and/or landscaping). Further, any development occurring before cannabis licensing would be required to comply with the LACC, Title 32 - Fire Code. In addition, cannabis business operations would be located in existing developed areas that have existing circulation systems and would not involve changes (e.g., new development within the wildland-urban interface or construction of new roadways) to areas that are subject to an existing emergency response plan or emergency evacuation plan. Further, cannabis business operations that require changes to existing buildings and/or on-site parking, driveways, and/or access would be required to comply with LACC Fire Code requirements regarding emergency access, evacuation, and fire suppression which apply to driveways, Americans with Disabilities Act of 1990 (ADA) accessibility, remodels of existing buildings, etc. Therefore, no impacts regarding adopted emergency response plans or emergency evacuation plans are anticipated.

- g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving fires, because the project is located within:
- (i) A high fire hazard area with inadequate access?

Less than Significant Impact. According to fire hazard mapping by the California Department of Forestry and Fire Protection (CAL FIRE), as part of the Fire and Resource Assessment Program (FRAP), several areas of the unincorporated county are classified as Very High Fire Hazard Severity Zones (VHFHSZ).<sup>11</sup> These zones consist largely of rural areas in the county such as the Santa Monica Mountains, Verdugo Mountains, Fond Wilderness Reserve, and the Gypsum Canyon Wilderness.

Cannabis businesses would be located within constructed and permitted structures in eligible commercial/mixed-use, industrial, and institutional zones, some of which exist within identified VHFHSZs, such as in the Santa Monica Mountains. However, all buildings would be required to comply with Title 32 of the LACC which requires the provision of adequate access (for emergency vehicles/personnel) and water pressure (to meet flow standards) for fire suppression

---

<sup>11</sup> Fire Hazard Severity Zones. 2024. Los Angeles County.  
<https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>.

in all buildings. The LACC Fire Code also would require operators of cannabis businesses located within mapped VHFHSZs to obtain applicable permits, arrange for LACoFD inspections of properties, and operate their cannabis business in compliance with fire prevention and emergency access requirements. Given that the proposed Project only would result in the use of constructed and permitted structures and all future cannabis businesses would be required to comply with the LACC Fire Code, impacts resulting from the proposed Project would be less than significant.

(ii) An area with inadequate water and pressure to meet fire flow standards?

No Impact. Future cannabis businesses would be located within existing buildings in eligible commercial/mixed-use, industrial, and institutional zones where existing fire suppression infrastructure currently exists. To receive a license from the County, future cannabis businesses would be required to comply with the LACC Fire Code, including, but not limited to, requirements that adequate water supply and pressure exists for the site for fire suppression (§ 507 - Fire Protection Water Supplies). Site improvements occurring as an indirect result of the proposed Project would not place substantial new demand on existing fire suppression systems given the relatively limited amount of site modifications that would be required (e.g., remodels of existing buildings, installation of irrigation systems, new signage, and landscaping). Therefore, no impacts are anticipated.

(iii) Proximity to land uses that have the potential for dangerous fire hazard?

Less than Significant Impact. Rural areas and areas adjacent to urbanized areas of the unincorporated county are classified as VHFHSZs. The proposed Project would permit cannabis uses within existing buildings in eligible commercial/mixed-use, institutional, and industrial zones, some of which occur within VHFHSZs and may exist in proximity to other established land uses that have the potential for dangerous fire hazards, such as open space and undeveloped lands or other nearby industrial and manufacturing uses. All existing buildings and sites on which future cannabis businesses would be located would comply, or would be modified to comply, with the LACC Fire Code and LACoFD to ensure that any licensed cannabis business that is mapped within VHFHSZs is properly inspected, is subject to applicable LACC Fire Code permits and requirements, and subject to fire prevention techniques (e.g., fuel modification requirements). Therefore, impacts as a result of the proposed Project would be less than significant.

h. Does the proposed use constitute a potentially dangerous fire hazard?

Less than Significant Impact. The proposed Project would establish certain commercial cannabis activities as allowable uses within constructed and permitted structures in eligible commercial/mixed-use, industrial, and institutional zones. For commercial cannabis activities, typical hazardous materials may include the use, application, storage, or transport of fuels, solvents, paints, oils, grease, and pesticides, as well as volatile and flammable gases and liquids used in manufacturing. In some cases, commercial cannabis volatile manufacturing activities may also present fire hazards. While the operation of cannabis businesses could present potential fire hazards, all businesses would be required to comply with Title 32 (§ 105.5.22) of the LACC and, if applicable, unified program facility permit requirements set forth in Chapters

12.50, 12.52, and 12.64 of Title 12, Environmental Protection, of the LACC. Operation of cannabis businesses must also comply with standards and regulations from LACoFD, including Regulation #30 which requires commercial buildings or tenant spaces handling cannabis products to submit detailed plans to LACoFD for review. In addition to hazardous materials requirements, cannabis businesses would be required to either occupy existing premises that comply, or retrofit existing premises to comply, with all other, applicable fire regulations of the LACC involving fire safety (e.g., LACC Title 32 requirements regarding construction, maintenance, and emergency access and evacuation). Therefore, the impacts resulting from the proposed Project would be less than significant.

## X. Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with the Los Angeles County Low Impact Development Ordinance (LACC, Title 12, Ch. 12.84)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than Significant Impact. The proposed Project is not a development project that directly involves construction of any new structures or uses that would produce substantial new wastewater or stormwater runoff. The proposed Project would establish commercial cannabis activities as allowable uses within constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones. Future cannabis activities resulting from the proposed Project would generate wastewater that would be disposed in either existing permitted private wastewater treatment systems (e.g., septic) or public sewer systems. However, it is not feasible to identify specifically which sites cannabis businesses would occupy and, consequently, the specific types of wastewater disposal systems individual cannabis businesses would utilize. Regardless, if a business operation proposes to use a private septic tank or alternative wastewater disposal system, the business operator would be required to demonstrate that the

---

proposed method of sewage disposal complies with environmental health and building code requirements that apply to the proposed method of sewage disposal (e.g., LACC Title 28 – Plumbing Code, Chapter 7 – Sanitary Drainage). New septic tanks or alternative wastewater disposal systems would be required to comply with current standards to ensure that adequate soils, percolation rates, and capacity exist to support the proposed cannabis business operation. Furthermore, pursuant to LACC, Title 28, § 101.3.3, if the Chief Plumbing Inspector determines that an existing septic tank or alternative wastewater disposal system is dangerous, unsafe, unsanitary, or a nuisance and a menace to life, health, or property, the business operator would be required to alter or replace the existing system pursuant to the requirements of the LACC.

Minor site alterations (e.g., landscaping or changes in impervious surfaces associated with changes to parking areas) could result in changes to drainage patterns and stormwater volumes, as well as increases in pollutant loading of stormwater runoff. However, where applicable, future cannabis businesses enabled by the proposed Project must comply with: (1) the NPDES Permit for the Municipal Separate Storm Sewer System (MS4 Permit) and adopted Total Maximum Daily Loads (TMDLs) for local receiving water bodies; (2) stormwater and runoff pollution control requirements (LACC Flood Control District Code, Chapter 21); (3) the County's low-impact development (LID) standards (LACC Title 12, Chapter 12.84 and Title 31, Chapter 5, § 5.106.3); and (4) the County's stormwater and runoff pollution control requirements (LACC Title 12, Chapter 12.80).

Mandatory compliance with existing regulations would ensure that future cannabis businesses enabled by the proposed Project would properly manage wastewater and stormwater runoff such that no water quality standards or waste discharge requirements are violated, or surface or groundwater quality are otherwise substantially degraded. Therefore, impacts would be less than significant.

- b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. Within the unincorporated county, the majority of potable water supplies for commercial/mixed-use, industrial, or institutional land uses is provided by local Municipal Water Districts and Los Angeles County Waterworks Districts that receive the majority share of their water supplies from imported surface water. However, in some areas of the County, groundwater supplies make up the predominant source of the municipal water supply, such as for Los Angeles County Waterworks District 37, Acton and Los Angeles County Waterworks District 40, Antelope Valley.

Water demand for commercial cannabis activities would result primarily from the cultivation of cannabis, while other commercial activities are anticipated to have low water demand similar to most commercial/mixed-use, industrial, or institutional land uses. However, indoor cultivation typically relies on hydroponic methods and recycled irrigation systems that reuse water. Although commercial cannabis activities have the potential to increase demand for municipal water supplies sourced from local groundwater aquifers, commercial cannabis activities would be located on existing developed lots that predominately already receive water



service from a public utility and are unlikely to create substantial new demand in groundwater supplies that would substantially deplete the supplies of local groundwater aquifers.

Further, given the proposed Project only would permit cannabis uses within constructed and permitted structures in urbanized areas, it is not likely that new development would substantially increase existing impervious surface area and, consequently, substantially reduce groundwater recharge rates. New development that is proposed to facilitate commercial cannabis activities would be permitted separately from the proposed Project and would be required to comply with the County's low-impact development (LID) standards (LACC Chapter 12.84 and Chapter 5, § 5.106.3) and other requirements involving the capture and infiltration of stormwater runoff from new development. Therefore, the proposed Project would result in less than significant impacts.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:

(i) Result in substantial erosion or siltation on- or off-site?

Less than Significant Impact. The proposed Project would allow new cannabis businesses to occupy constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones. Given that cannabis businesses would occupy existing developed properties, future cannabis businesses that could result from the proposed Project would not involve extensive site alterations (e.g., grading activities) that would cause erosion and/or siltation on- or off-site. New development must comply with: (1) the NPDES MS4 Permit and adopted TMDLs for local receiving water bodies; (2) stormwater and runoff pollution control requirements (LACC Flood Control District Code, Chapter 21); (3) the County's LID standards (LACC Title 12, Chapter 12.84 and Title 31, Chapter 5, § 5.106.3); and (4) the County's stormwater and runoff pollution control requirements (LACC Title 12, Chapter 12.80). Therefore, given the developed characteristics of potential cannabis sites, limited amount of new site alterations that would result from the Project, and regulations that would apply to new development, the proposed Project would have a less than significant impact.

(ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?

Less than Significant Impact. The proposed Project does not involve direct impacts from new development, but would create the potential for commercial cannabis activities to occupy existing buildings within existing industrial, commercial/mixed-use, and institutional zones of the county. As such, the proposed Project involves indirect impacts associated with limited physical modifications to constructed and permitted structures (e.g., landscaping, signage, or façade treatments). Any new development would be permitted separately and would be subject to the requirements of the Federal Emergency Management Agency (FEMA) National Flood Insurance Program and LACC (Title 11, Division 3, Ch. 11.60, § 11.60.040), thereby avoiding the creation of new or exacerbating existing flood hazards, particularly within areas that are prone to significant flood hazards (e.g., 100-year floodplains). Although it is unlikely that new

development would involve grading activities given that cannabis businesses would occupy existing developed sites, all grading activities that could occur as an indirect result of the proposed Project would be subject to the requirements of the LACC (Building Code, Appendix J, § J101.2) that requires the retention of stormwater on development sites, and the preparation of a grading and drainage plan that will not exacerbate flood conditions either on or off development sites. Finally, pursuant to the LACC (Title 22, Division 6, Chapter 22.118), in the event that new development has the potential to create a flood hazard or otherwise would compromise public safety, cannabis business operators would be required to design the proposed development and develop a drainage plan in compliance with the requirements of a Flood Control District Permit, thereby avoiding such hazards. Therefore, given the limited potential for new development and mandatory compliance with existing regulations, the proposed Project would have a less than significant impact.

- (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact. The proposed Project does not directly involve new development or redevelopment, and commercial cannabis activities would occur within eligible institutional, industrial, and commercial/mixed-use zones of the county that are primarily built-out and consist largely of developed areas. Given that the precise locations within the eligible zones and extent of development resulting from the proposed Project cannot be determined at this time, it is not feasible to determine specifically which constructed and permitted structures would require renovation and which water and sewage systems would be used, to accommodate potential cannabis activities. However, future cannabis businesses occurring within these areas are not expected to substantially alter existing drainage patterns or generate substantial amounts of increased runoff on- or offsite which would exceed the capacity of existing or planned drainage systems. Any redevelopment associated with the establishment of cannabis businesses licensed pursuant to the proposed Project would be subject to applicable regulations described above which require the retention and infiltration of stormwater onsite, the use of LID, compliance with NPDES MS4 permit requirements, and review and approval of grading/drainage plans, if grading is required or development is located in flood hazard areas. Therefore, the proposed Project would have a less than significant impact.

- (iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?

Less than Significant Impact. The proposed Project would not result in substantial, new physical development given that new cannabis operations would be limited to developed properties. Most urban creeks within the county consist of trapezoidal, concrete-lined, and channelized corridors with floodplains that do not extend outside of creek channels. As such, it is unlikely that cannabis business operations resulting from the proposed Project would be located within a 100-year or County Capital Flood floodplain. However, in the unlikely event that new development required for a cannabis business is proposed to be located within a 100-year flood hazard area or County Capital Flood floodplain, the proposed new development would

---

be subject to the requirements of the FEMA National Flood Insurance Program and LACC (Title 11, Division 3, Ch. 11.60, § 11.60.040), thereby avoiding the creation of new or exacerbating existing flood hazards. Further, although it is unlikely that new development would involve grading activities given that cannabis businesses only could occupy existing developed sites, any potential grading activities that might be required for the redevelopment of a site would be subject to the requirements of the LACC (Building Code, Appendix J, § J101.2) which require the retention of stormwater on-site, and the preparation of a grading and drainage plan to avoid the creation of impediments to, or causing the redirection of, flood flows. Finally, pursuant to the LACC (Title 22, Division 6, Chapter 22.118), in the event that new development has the potential to create a flood hazard or otherwise would compromise public safety, cannabis business operators would be required to design the proposed development and develop a drainage plan in compliance with the requirements of a Flood Control District Permit, thereby avoiding such hazards. Therefore, limitations on the potential locations of future cannabis activities set forth in the proposed cannabis licensing regulations and compliance with existing federal and County regulations regarding development in flood hazard areas, would ensure that the proposed Project would have a less than significant impact.

- d. Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?

Less than Significant Impact. Cannabis business operations resulting from the proposed Project would be located in constructed and permitted structures and would not result in development within a federal 100-year or County Capital Flood floodplain. Furthermore, in the unlikely event that any new development required for a cannabis business is proposed to be located within a federal 100-year flood hazard area or County Capital Flood floodplain, the proposed new development would be subject to the requirements of the FEMA National Flood Insurance Program and LACC (Title 11, Division 3, Ch. 11.60, § 11.60.040), thereby avoiding the creation of new or exacerbating existing flood hazards. Therefore, the proposed Project would have a less than significant impact.

- e. Conflict with the Los Angeles County Low Impact Development Ordinance (LACC, Title 12, Ch. 12.84)?

No Impact. The proposed Project would establish commercial cannabis as an allowable use within constructed and permitted structures in eligible commercial/mixed-use, industrial, and institutional zones. The County has prepared the LID Standards Manual to comply with the requirements of the NPDES MS4 Permit. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in the unincorporated county for the purpose of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. Pursuant to the LACC § 12.84.430, the LID Ordinance only applies to projects involving a certain minimum amount of new development on properties on which commercial cannabis activities would be allowed (e.g., the replacement or creation of at least 5,000 square feet of impervious surfaces in industrial parks or commercial malls with at least 10,000 square feet of surface area). Given that cannabis businesses would be required to be located on existing

developed sites, it is unlikely that the redevelopment of sites to accommodate cannabis businesses would be subject to the LID Ordinance. Regardless, in the event that redevelopment of a site to accommodate a cannabis business is subject to the LID Ordinance, the redevelopment would be required to comply with the LID Ordinance standards as part of site plan review. Therefore, no impacts would occur as a result of the proposed Project with respect to potential conflicts with the LID Ordinance.

- f. Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?

Less than Significant Impact. The proposed Project would establish commercial cannabis as an allowable use within constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones where wastewater is disposed in either existing permitted private wastewater treatment systems (e.g., septic) or public sewer systems. The potential exists for a commercial cannabis operation to be located on a site that currently relies on a private onsite wastewater treatment system for sewage disposal, within an area of known geological limitations, or in close proximity to surface water. However, in such cases, cannabis business operators would be required to comply with existing regulations that ensure onsite wastewater treatment systems are adequately sited and designed to avoid known geological limitations. For instance, business operators would be required to demonstrate that the proposed method of sewage disposal complies with environmental health and building code requirements that apply to the proposed method of sewage disposal (e.g., LACC Title 28 - Plumbing Code, Chapter 7 - Sanitary Drainage). New septic tanks or alternative wastewater disposal systems would be required to comply with current standards to ensure that adequate soils, percolation rates, and capacity exist to support the proposed cannabis business operation. Furthermore, pursuant to LACC, Title 28, § 101.3.3, if the Chief Plumbing Inspector determines that an existing septic tank or alternative wastewater disposal system is dangerous, unsafe, unsanitary, or a nuisance and a menace to life, health, or property, the business operator would be required to alter or replace the existing system pursuant to the requirements of the LACC. Therefore, impacts would be less than significant.

- g. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less than Significant Impact. Cannabis activities authorized pursuant to the proposed Project would be confined to commercial/mixed-use, institutional, and industrial zones of the county. Based on eligible zoning for commercial cannabis activities outlined in the proposed Project, there is potential for commercial cannabis activities to be located in areas that are subject to flooding and inundation hazards. For instance, certain cannabis activities would be allowed within eligible zones in the Marina del Rey Specific Plan Area, which is located within a mapped tsunami hazard area. Any future cannabis business that is proposed to be located in a flood hazard, tsunami hazard, or seiche hazard area would be required to comply with applicable federal, State, and local regulations governing development within a flood hazard area. Further, all cannabis activities (e.g., manufacturing that involves the use of volatile chemicals) would be required to comply with the LACC Cannabis Facilities (Title 11, Chapter 11.37) that sets forth requirements for the operation of cannabis facilities and waste management procedures that

would further prevent risks associated with the release of pollutants in the unlikely event that a cannabis premises is located within an area that is subject to flood hazards. Therefore, the proposed Project would have a less than significant impact.

h. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. The proposed Project is not a development project that involves direct impacts from the construction of any new structures. Proposed cannabis activities would be confined to constructed and permitted structures in commercial/mixed-use, institutional, and industrial zones of the county. Permitted cannabis businesses enabled under the proposed Project would be subject to all existing regulations described above, including existing State DCC regulations, Department of Public Health requirements, requirements and standards of the LACC, and State Water Resources Control Board (SWRCB) regulations, which are intended to ensure the protection of local water supplies and groundwater resources. Given cannabis business operators would be required to demonstrate compliance with such existing regulations, and given proposed activities would be similar in scale and intensity to existing commercial/mixed-use, institutional, and industrial uses, impacts are considered less than significant.

## XI. Land Use/Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Physically divide an established community?

No Impact. The proposed Project would permit and regulate commercial cannabis activities and businesses in certain unincorporated areas of the county. The proposed Project would not result in the rezoning of lands, substantial new physical development, or the creation of substantial new public infrastructure (e.g., new roadways). Any structural development resulting from the proposed Project would be limited to interior renovations of existing buildings and

---

ancillary features (e.g., installation of security lighting, new signage, and landscaping) on existing developed lots, and would not involve construction at a scale that could physically divide an established community. Therefore, the proposed Project would not physically divide an established community and no impacts would occur.

- b. Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. Numerous County plans and policies, including (but not limited to) the County General Plan, Area Plans, Community Plans, Neighborhood Plans, Local Coastal Program, Specific Plans, and the LACC (e.g., Title 22 Zoning Ordinance), govern land use and development in the unincorporated county. The proposed Project would amend certain LACC zoning and business licensing regulations. Proposed zoning amendments would prohibit commercial cannabis uses in residential, agricultural, and open space zones, and would allow commercial cannabis activities on eligible sites in commercial/mixed-use, industrial, and institutional zones. Commercial cannabis would be further restricted within these eligible zones by a 600-foot buffer area around youth-oriented uses that include schools, public parks, public libraries, child daycare centers, public recreational facilities, and licensed game arcades. These specifications and limitations on land use would promote consistency with most plans, policies, and regulations. However, given that the proposed Project involves amendments to the LACC to establish commercial cannabis activities as allowed uses, there is potential for resulting operations to be inconsistent with environmental-related planning objectives, policies, and/or regulations that are intended to prevent adverse impacts associated with, but not limited to, air quality, energy use, GHG emissions/climate change, hazards/hazardous materials, hydrologic conditions, neighborhood compatibility, water demand, sewage disposal services, and traffic. Therefore, impacts related to land use policy consistency would be potentially significant.

- c. Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?

Less than Significant Impact. Unincorporated areas of the county where commercial cannabis uses would be permitted would be subject to Title 22 of the LACC. The proposed Project would permit commercial cannabis activities only within existing structural development on eligible sites in commercial/mixed-use, industrial, and institutional zones, as well as certain specific plan areas. The proposed Project would prohibit cannabis activities in SEAs. Further, given that cannabis activities only would be located on existing developed sites, the proposed Project would not result in new development in HMAs. However, in the unlikely event that a cannabis activity is proposed on a parcel located within an HMA, the proposed cannabis activity would be required to comply with the LACC Title 22, Division 5, Chapter 22.104 requirements for development within HMAs or otherwise would be denied. Therefore, conflicts with goals and policies relating to HMAs and SEAs would be unlikely, and impacts would be less than significant.

## XII. Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

No Impact. Mineral resources are geological deposits in or on the Earth's crust that may have economic value and include fuels, metals, and non-metals. The California Surface Mining and Reclamation Act of 1975 (SMARA) requires the State Geologist to identify Mineral Resource Zones (MRZs) according to the known or inferred mineral potential of lands. The process is based solely on geology, without regard to existing land use or land ownership. The primary goal of mineral land classification is to ensure that decision-makers consider the potential effects of land use decisions on mineral resources.

The County's General Plan includes a map of the four major designated MRZ-2 zones within the following unincorporated areas of the county: Little Rock Creek Fan; Soledad Production Area; Sun Valley Production Area; and Irwindale Production Area.<sup>12</sup> These areas include active and inactive oil and gas wells, as well as residential, commercial, institutional (e.g., schools), recreational (e.g., parks), and industrial land uses. As described in the *Project Description* (above), commercial cannabis activities would be restricted to eligible sites in commercial/mixed-use, industrial, and institutional zones, as well as some specific plan areas. Commercial cannabis activities would not be permitted on land zoned as residential, agricultural, or open space. Additionally, the proposed Project would only allow commercial cannabis activities within existing structural development, thereby limiting the amount of new development that could occur (e.g., installation of security lighting, signage, landscaping) and making it unlikely that the development could result in the loss of availability of a known valuable mineral resource. Therefore, even if eligible parcels overlap with a designated MRZ-2,

<sup>12</sup> The State Geologist classifies MRZ-2 zones as areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.

the proposed Project would not result in the loss of availability of a known mineral resource, and there would be no impacts.

b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The proposed Project would permit cannabis activities only in constructed and permitted structures in commercial/mixed-use, institutional, and industrial zones of the county, which are unlikely to exhibit locally important mineral resources. Any site modifications would be limited (e.g., outdoor façade treatments, landscaping) and would require compliance with existing plans, policies, and regulations, including the requirements of SMARA, the General Plan, and any local or area plans regarding the protection and conservation of mineral resources. Therefore, there would be no impacts relating to locally important mineral resource recovery sites.

### XIII. Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (LACC, Title 12, Chapter 12.08), or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (LACC, Title 12, Chapter 12.08), or applicable standards of other agencies?

Less than Significant Impact. The proposed Project would limit the location of commercial cannabis activities to constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones in the county. The existing noise environment primarily



---

consists of on-road vehicle noise and, to a lesser degree, other transportation-generated noise (e.g., aircrafts and railroads) and noise from existing development and activities within the zones in which cannabis activities would be allowed (e.g., noise from manufacturing equipment in industrial zones). Heating, ventilation, and air conditioning (HVAC) systems, vehicle trips by haulers of commercial cannabis products, delivery drivers' trips, employee trips, and customer trips are the principal sources of noise attributable to commercial cannabis operations, and are similar to noise-generating activities within commercial/mixed-use, industrial, and institutional zones in which commercial cannabis operations would be allowed. Ambient noise levels in commercial, institutional, and industrial areas typically range from 55 A-weighted decibels (dBA) to 70 dBA.<sup>13</sup> In addition, cannabis activities only would be allowed within constructed and permitted structures, would not be allowed within residential zones, and would be required to comply with Chapter 12.08 of the LACC which limits the days and hours of noise-generating construction and other specific activities (e.g., loading and unloading activities) and establishes maximum acceptable noise levels based on the type of noise receptor (e.g., residential, commercial, or industrial property) which cannabis activities could not exceed. Given that the potential noise levels produced as a result of the proposed Project are unlikely to increase existing ambient noise levels, and any cannabis activities allowed as a result of the proposed Project would be required to comply with the maximum acceptable noise requirements of the LACC, impacts would be less than significant.

b. Generation of excessive groundborne vibration or groundborne noise levels?

No Impact. The proposed Project would allow commercial cannabis activities only within constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones in the unincorporated areas of the county. Given that the proposed Project would only permit cannabis businesses within constructed and permitted structures, construction activities (e.g., installation of security lighting, fencing, or interior renovations) required to establish a commercial cannabis business would not require the use of heavy equipment and/or construction techniques (e.g., pile driving or blasting) that have the potential to create detectable levels of groundborne vibration and/or noise. Further, cannabis activities do not typically involve the use of equipment and/or involve operational activities that produce groundborne vibration or noise. Therefore, no excessive groundborne noise levels or groundborne vibration are expected. No impacts regarding excessive groundborne vibration or groundborne noise levels are anticipated as a result of the proposed Project.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

---

<sup>13</sup> LACC Chapter 12.08 Noise Control.

[https://library.municode.com/ca/los\\_angeles\\_county/codes/code\\_of\\_ordinances?nodeId=TIT12ENPR\\_CH12.08NO\\_CO](https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NO_CO).

Less than Significant Impact. As previously described in Section IX, *Hazards and Hazardous Materials*, the proposed Project would allow commercial cannabis activities within commercial/mixed-use, institutional, and industrial zones of the unincorporated county, which may be located adjacent to an airport or airstrip and within a 2-mile radius of an airport or the boundaries of an adopted ALUP. However, the commercial cannabis operations would be required to be located within existing buildings and limited, new development resulting from the proposed Project would be subject to the maximum acceptable noise requirements of the LACC and applicable standards of an ALUP which set forth restrictions on the type of use and form of development located within established airport safety zones and noise contours. Given these requirements, the proposed Project is not anticipated to expose residents or employees to excessive noise levels from airport and/or airstrip operations. Therefore, impacts regarding exposure to airstrip and/or airport noise would be less than significant.

## XIV. Population/Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant Impact. The proposed Project would allow commercial cannabis activities in eligible areas of the unincorporated county. Cannabis businesses would be required to occupy existing buildings, and the proposed Project would not result in the construction of new residential units or buildings, or the extension of roads or infrastructure to undeveloped areas, which could induce substantial unplanned population growth in any of the areas where cannabis activities would be allowed.

The proposed Project would permit new commercial cannabis businesses in the unincorporated county, which could increase employment opportunities and temporary visitors. However, the potential for these commercial activities to result in indirect growth inducement is limited, given that it is generally driven by new full-time equivalent (FTE)

employees and the assumption that they would be migrating to the area. Given the social equity component of the proposed Project, employees are expected to be drawn from the existing workforce in the county; therefore, at least a certain portion of the potential demand for new employees would be satisfied by those already residing in the area. Further, given that cannabis businesses would be required to be located within existing buildings that were previously occupied with commercial, industrial, and/or institutional uses that currently employ or previously employed workers, the change in use of properties to allow cannabis businesses is unlikely to result in a substantial net increase in new employment. Due to the limited potential for indirect growth inducement, impacts would be less than significant.

b. Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed Project would not displace any people or housing units, and the construction of replacement housing would not be required. The proposed Project would prohibit cannabis businesses in residential zones and on properties with a dwelling, and only would be allowed in existing buildings in eligible commercial/mixed-use, industrial, and institutional zones. Therefore, there would be no impacts regarding the displacement of people or housing necessitating the construction of replacement housing.

## XV. Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Sheriff protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Libraries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Fire protection?

---

Less than Significant Impact. The proposed Project would limit and establish monitoring requirements for commercial cannabis activities in certain unincorporated areas of the county. The proposed Project would not result in new development; commercial cannabis operations would only be permitted within existing buildings in eligible zones and, consequently, would result in limited site alterations (e.g., outdoor façade treatments, installation of indoor cultivation irrigation systems, and interior remodeling). As discussed in Section XIV, *Population and Housing*, economic improvement and expansion of the commercial cannabis industry resulting from the proposed Project could result in indirect growth inducement. However, the proposed Project would limit new commercial cannabis activities to constructed and permitted structures and, consequently, would replace existing businesses or vacant spaces and, therefore, would not substantially increase the number of employees and corresponding population within the unincorporated county. In addition, the proposed social equity requirements of the proposed Project are likely to result in the hiring of at least some employees from the existing regional county workforce. Therefore, the firefighter-to-population ratio (service ratio) of LACoFD would not be altered significantly as a result of population growth resulting from the proposed Project. Additionally, because commercial cannabis operations would only be permitted within existing structural development served by LACoFD, no impacts related to fire protection response times or service levels are anticipated to occur. Further, cannabis businesses would be required to comply with all applicable requirements of the LACC Fire Code which pertain to fire flow, emergency access, and building requirements. It is not anticipated that the proposed Project would require LACoFD to construct new facilities or alter existing facilities to maintain acceptable service ratios or response times. As such, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities.

Elevated risk of fire associated with indoor cannabis cultivation is a common concern because indoor cannabis cultivation typically involves the use of high-intensity grow lights, as well as various other pieces of equipment (e.g., water pumps, humidity control, temperature control) that can require a substantial amount of electrical energy. If the load exceeds the system capacity, it could result in an electrical fire. Further, manufacturing processes could involve the use and storage of volatile chemicals. However, all structures and operations would need to comply with regulations relating to public safety, including the CBC, the California Fire Code and LACC Fire Code, and the California Electrical Code, and would be subject to LACoFD Fire Prevention Division inspections. The Fire Prevention Division also would be responsible for ensuring that cannabis businesses comply with specific regulations, requirements, and conditions of approval for cannabis activities (e.g., manufacturing involving the use of volatile chemicals). Therefore, impacts regarding fire protection services would be less than significant.

b. Sheriff protection?

Less than Significant Impact. Commercial cannabis operations resulting from the proposed Project would be limited to existing buildings in eligible areas. The Los Angeles County Sheriff's Department (Sheriff's Department) currently serves the areas in which commercial cannabis activities would be located. As described in Section XIV, *Population and Housing*, the proposed Project would not cause significant population growth that could affect personnel-to-

population ratios, or require the Sheriff's Department to construct new facilities or alter existing facilities to maintain acceptable service ratios or response times. As such, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities.

Currently, medical and non-medical cannabis businesses or activities (except for personal use of cannabis allowed under MAUCRSA) are prohibited in the county. Under these existing conditions, the Sheriff's Department spends time and resources responding to cannabis activity-related crimes and complaints, such as investigating and abating unpermitted cultivation, manufacturing, and sales operations. The proposed Project would establish certain commercial cannabis activities as legal uses and create permitting, licensing, and enforcement requirements that County departments would be responsible for implementing, thereby reducing enforcement activities regarding these operations. With a legal pathway for cannabis cultivation and an increased supply of legally grown cannabis, there also may be less opportunity or incentive for individuals or organizations to conduct illegal operations, further decreasing the need for law enforcement in response to cannabis operations. In addition, all commercial cannabis businesses under the proposed Project would be subject to review and inspection from agents of the County charged with enforcement of the LACC and any other applicable State or local laws. While some crime associated with permitted cannabis commercial and industrial activities would likely continue (e.g., robberies at cultivation or retail sites), a net increase in cannabis-related crime is not anticipated. Therefore, impacts to police protection would be less than significant.

c. Schools?

Less than Significant Impact. As previously described in Section XIV, *Population and Housing*, the proposed Project would not cause significant population growth, including any increase in school-aged children within the county. Therefore, there would not be an increase in demand for schools to the extent that new or altered school facilities would be needed, the construction of which could cause significant impacts. In addition, because schools qualify as a youth-oriented use, commercial cannabis businesses would be required to be located a minimum of 600 feet from any school. Commercial cannabis businesses also would be required to be located within existing buildings thereby limiting the amount of new development involved with the establishment of a new business. Therefore, development activities associated with, and the operation of, commercial cannabis business are unlikely to interfere with the operations of schools. Impacts to schools would be less than significant.

d. Parks?

Less than Significant Impact. As previously described in Section XIV, *Population and Housing*, the proposed Project would not produce substantial new development and is not anticipated to result in significant population increases. As a result, the proposed Project would not necessitate the provision of new or physically altered recreational facilities to maintain acceptable population-to-recreation ratios. In addition, because parks qualify as a youth-oriented use, commercial cannabis businesses would be required to be located a minimum of 600 feet from any park. Further, commercial cannabis businesses would be required to be

located within existing buildings thereby limiting the amount of new development that would be required to establish a new cannabis business. Therefore, development activities associated with, and the operation of, commercial cannabis business are unlikely to interfere with the use of parks. Impacts to parks would be less than significant. (Also, see Section XVI, *Recreation*, for additional discussion.)

e. Libraries?

Less than Significant Impact. As described in Section XIV, *Population and Housing*, the proposed Project would produce limited new development and is not anticipated to result in significant population increases. Therefore, the proposed Project would not result in a measurable increase in demand for library services, and no new or physically altered government facilities would be required which could cause significant environmental impacts. In addition, given that libraries qualify as a youth-oriented use, commercial cannabis businesses would be required to be located a minimum of 600 feet from any library and commercial cannabis businesses are unlikely to interfere with the operation of a library. Therefore, impacts relating to libraries would be less than significant.

f. Other public facilities?

Less than Significant Impact. The proposed Project would not produce substantial new development and is not anticipated to result in significant population growth. Therefore, the proposed Project would not result in a substantial increase in demand for other public facilities, and no new or physically altered public or government facilities would be required which could cause significant environmental impacts. Additionally, the proposed Project would establish limitations and restrictions on commercial cannabis activities, including the establishment of a 600-foot buffer around youth-oriented uses and Drug Abuse and Recovery Treatment Centers. Therefore, commercial cannabis operations are unlikely to conflict with the operations of public facilities. Impacts to other public facilities would be less than significant.

## XVI. Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
b. Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Would the project interfere with regional trail connectivity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. As previously described in Section XIV, *Population and Housing*, and Section XV, *Public Services*, the proposed Project would not result in a substantial increase in the development of new residential units or population growth that could increase the use of existing neighborhood or regional parks or contribute to substantial physical deterioration of recreational facilities. Therefore, no impacts are anticipated.

b. Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?

No Impact. The proposed Project does not include the development of neighborhood parks, regional parks, or other recreational facilities. Additionally, given that the proposed Project would not result in direct population growth and would result in the potential for only limited indirect growth, the proposed Project would not require the construction or expansion of such facilities that could result in adverse physical impacts. Therefore, no impacts to recreational resources are anticipated as a result of the proposed Project.

c. Would the project interfere with regional trail connectivity?

No Impact. The proposed Project would not result in or facilitate substantial development, and would not result in any zoning changes to, or changes in allowed uses in, open space areas (e.g., the introduction of new uses). In addition—given that parks qualify as youth-serving facilities—commercial cannabis businesses would be required to be located a minimum of 600 feet from any park that includes an existing or planned, new regional recreational trail. Therefore, no changes to regional trail systems are anticipated, and the proposed Project would have no impact on regional trail connectivity.

## XVII. Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. The proposed Project would permit and regulate commercial cannabis activities in certain areas of the unincorporated county. It does not include the development of new buildings, residential or otherwise, and would be limited in its potential for indirect growth inducement. However, new commercial cannabis businesses could generate temporary increases in construction-related vehicle trips within the county due to, for example, the interior renovation of existing buildings, construction of new signage, installation of new landscaping, and reconfiguration of parking areas. Additionally, the operation of commercial cannabis businesses could increase vehicle trips in eligible commercial or industrial areas associated with customer and employee trips, as well as distribution of cannabis and cannabis products, if they occupy developed sites that currently are not occupied with another type of business or organization, or involve trip generation rates that are greater than businesses that currently occupy sites that would be replaced with commercial cannabis businesses. Potential increases in traffic generation resulting from the proposed Project could be inconsistent with the Southern California Association of Government’s (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which identifies strategies and projections relating to regional transportation, land use and growth management, and air quality. Therefore, the proposed Project along with other projects that would contribute to cumulative increases in traffic could conflict with applicable programs, plans, and policies relating to transportation and circulation, thereby causing a potentially significant impact.



b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Potentially Significant Impact. CEQA Guidelines § 15064.3, subdivision (b), sets forth general criteria for local jurisdictions to use when evaluating a project's impacts regarding vehicle miles traveled (VMT), or the amount and distance of automobile travel attributable to a project. The proposed Project would limit commercial cannabis businesses to eligible mixed-use/commercial, industrial, and institutional zones. Furthermore, cannabis businesses would be required to occupy existing buildings, at least some of which are likely to be currently occupied by businesses that produce VMT. However, given that the exact locations of future cannabis businesses are unknown, it is unclear whether future commercial cannabis operations resulting from the proposed Project would result in a change in regional travel patterns and VMT as compared to existing conditions. The operation of commercial cannabis businesses could increase vehicle trips associated with customer, suppliers, and employee trips, as well as distribution of cannabis and cannabis products if they occupy developed sites that currently are not occupied with another type of business or organization, or involve trip generation rates that are greater than businesses that currently occupy sites that would be replaced with commercial cannabis businesses. Further, future cannabis businesses could involve travel and distribution routes that are longer than what existing businesses currently produce, thereby resulting in a net increase in VMT. Therefore, impacts are potentially significant.

c. Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. The proposed Project would not produce substantial new development and would not involve additions or alterations to existing transportation features, nor would it result in the operation of large farm equipment or other incompatible uses on roadways. New commercial cannabis operations may result in increases in the number of commercial truck trips in eligible commercial or industrial areas, particularly for the transport of cannabis or cannabis products. However, such vehicles are likely to be similar to vehicles associated with existing commercial and industrial development and would not substantially increase hazards due to road design features or uses. Therefore, impacts would be less than significant.

d. Result in inadequate emergency access?

Less than Significant Impact. The proposed Project would authorize commercial cannabis operations in areas that have existing public roadway infrastructure that affords access to and within the zones in which commercial cannabis activities would be allowed. Additionally, as previously described in Section XV, *Public Services*, service ratios and response times for police and fire protection services would not be affected due to the limited potential for indirect growth inducement resulting from the proposed Project, and the fact that future commercial cannabis operations would be located within areas that have existing circulation systems, sheriff stations, and fire stations that facilitate emergency response. In the unlikely event that existing roadways are inadequate to provide emergency access to a proposed cannabis operation, existing roadways would be required to be revised and/or new roadways would be required that comply with the access requirements of the LACC (Title 32, Chapter 503, Fire

Apparatus Access Roads). Further, future site alterations resulting from the proposed Project would be required to comply with other relevant County plans, policies, and regulations (e.g., General Plan Safety Element Goal S 4 and related fire hazard policies, and Goals S 7 and related emergency access policies). Therefore, impacts related to emergency access would be less than significant.

## XVIII. Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k)?

Less than Significant Impact. The proposed Project would allow commercial cannabis businesses to be located only within constructed and permitted structures in commercial/mixed-use, institutional, and industrial zones in the unincorporated county. Therefore, the proposed Project is unlikely to result in grading or other ground disturbance activities that could encounter significant subsurface resources that might exist at potential, future commercial cannabis sites. In addition, although certain sites could involve at least minor alterations to existing developed sites (e.g., interior remodels of existing buildings, installation of signage, landscaping, or painting), if a site is located in a Historic District or is a designated Historical Landmark, the cannabis business operator would be required to demonstrate that the business complies with the County's Historic Preservation Ordinance (LACC Title 22, Chapter 22.124) and obtain a Certificate of Appropriateness, thereby demonstrating that the proposed

development would not adversely affect the historic feature or site. Therefore, impacts would be less than significant.

- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact. Public Resources Code § 5024.1 established a California Register of Historical Resources. The California Register is a guide that identifies the State's historical resources and properties that are to be protected, to the extent prudent and feasible, from substantial adverse change. Subdivision (c) sets forth the criteria for determining whether a resource qualifies for listing on the National Register of Historic Places.

The proposed Project would require cannabis businesses to occupy constructed and permitted structures in commercial/mixed-use, institutional, and industrial zones in the county. Therefore, the proposed Project is unlikely to result in ground disturbance or other types of physical development that could adversely affect features or sites that either are, or eligible to be, included on the National Register of Historic Places including, but not limited to, resources that are significant to a California Native American Tribe. Further, if development is proposed to or on a designated or eligible feature or site, the applicant would be required to comply with the County's Historic Preservation Ordinance (LACC Title 22, Chapter 22.124) and demonstrate that the proposed development complies with the standards for issuing a Certificate of Appropriateness, demonstrating that the proposed development will not adversely affect the historic feature or site. Therefore, impacts would be less than significant.

## XIX. Utilities/Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact. Water demand for commercial cannabis activities would result primarily from the cultivation of cannabis, while other commercial activities are anticipated to have low water demand similar to most commercial/mixed-use, industrial, or institutional land uses. However, as previously described in Section X, *Hydrology and Water Quality*, indoor cultivation typically relies on hydroponic methods and recycled irrigation systems that reuse water. Although commercial cannabis activities have the potential to increase water demand, commercial cannabis activities would be located on existing developed lots that already receive water service from a public utility and are unlikely to create substantial new demand requiring the construction of new or expanded water supply systems.

Further, the proposed Project would prohibit outdoor cultivation of cannabis and indoor cultivation involves irrigation techniques that recycle the water and result in little to no runoff or wastewater generation. For other commercial cannabis activities (e.g., retail sales, distribution, and testing), wastewater demands are similar to other commercial, industrial, or retail uses that generate municipal wastewater primarily from workers or customers. Therefore, the proposed Project would not substantially increase wastewater generation thereby requiring new or expanded wastewater treatment systems.

The proposed Project would allow new cannabis businesses to occupy constructed and permitted structures in commercial/mixed-use, industrial, and institutional zones. As previously described in Section X, *Hydrology and Water Quality*, given that cannabis businesses would occupy existing developed properties, future cannabis businesses that could result from the proposed Project would not result in a substantial increase in impervious surfaces and runoff

and the need for new drainage facilities. New development must comply with: (1) the NPDES MS4 Permit; (2) the County's LID standards (LACC Title 12, Chapter 12.84 and Title 31, Chapter 5, § 5.106.3); and (3) the County's stormwater runoff requirements (LACC Title 12, Chapter 12.80). Compliance with these requirements would limit stormwater runoff from commercial cannabis sites and would not result in the need to construct new or expanded stormwater systems to accommodate commercial cannabis activities.

As previously described in Section VI, *Energy*, all cannabis businesses would be required to comply with the County's energy efficiency standards and would comply with applicable lighting regulations of the LACC (e.g., § 22.410.090.B.2 [East Los Angeles Third Street Form-Based Code Specific Plan General Standards for Transect Zones, Outdoor Lighting] and § 22.112.080.H [Parking Lot Lighting]). Site alterations would involve activities such as interior remodeling, signage, security lighting, and landscaping that would not substantially increase energy consumption. Indoor cannabis cultivation could create demand for electrical energy that might be greater than what otherwise would occur in the buildings in which cannabis cultivation would occur. However, these activities would not create a need for substantial expansions of electrical infrastructure.

Commercial cannabis activities are unlikely to generate a substantial increase in demand for new or expanded natural gas and/or telecommunication facilities. Commercial cannabis activities generally do not involve uses that involve greater amounts of natural gas consumption or require more sophisticated or enhanced telecommunications as compared to other commercial, industrial, and/or institutional uses that currently occur on the properties on which commercial cannabis businesses would be located.

Given that the proposed Project would be limited to developed areas of the unincorporated county with existing infrastructure that serves uses that have similar utility demands as commercial cannabis businesses, the expansion of existing or entirely new infrastructure for services and utilities is not anticipated. Therefore, impacts would be less than significant.

- b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. The proposed Project involves licensing cannabis businesses and activities that could generate water demand within constructed and permitted structures that would be accommodated by existing and planned water supplies. Such operations would be permitted in commercial/mixed-use, institutional, and industrial zones that could result in a net increase in water demand. Water demand for commercial cannabis activities would result primarily from the cultivation of cannabis, while other commercial activities are anticipated to have low water demand similar to most commercial/mixed-use, industrial, or institutional land uses. However, indoor cultivation typically relies on hydroponic methods and recycled irrigation systems that reuse water. Nevertheless, licensed cannabis businesses have the potential to increase water demand as compared to existing uses. Given this potential for cannabis activities to increase water demand as compared to existing conditions, impacts would be potentially significant.

- 
- c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Potentially Significant Impact. The proposed Project does not directly involve the construction, demolition, or redevelopment of any structures or uses that would discharge wastewater or modify existing discharge systems. Proposed commercial cannabis activities would be subject to existing State and local regulations governing wastewater disposal. Wastewater would be managed using existing wastewater systems regulated through the County's NPDES MS4 Permit and adopted TMDLs for local receiving water bodies. Although it is likely that commercial cannabis activities would not substantially increase wastewater generation, it is not feasible to identify the specific locations of future commercial cannabis activities and whether local infrastructure is adequate to support any increase in wastewater generation as compared to existing conditions. Therefore, impacts to existing wastewater treatment would be potentially significant.

- d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact. Commercial cannabis activities would generate solid waste from materials, containers, equipment, and typical municipal waste that is currently managed and disposed of at local waste transfer, sorting, or disposal facilities that operate within their permitted capacity. Additionally, the cultivation of cannabis generates green waste or cannabis plant waste that requires special management and disposal pursuant to State regulations. Commercial cannabis businesses would be required to comply with existing State regulations that require businesses to compost or recycle their organic waste (Assembly Bill [AB] 1826) and requirements for all cities and counties within the State to reduce, recycle, and compost at least 50 percent of waste that otherwise would be disposed in landfills. Any hazardous materials defined in Title 22, Division 4.5, Chapter 11 of the California Code of Regulations which are used or generated during operation of a commercial cannabis business, must be managed and disposed in accordance with State regulations at a permitted hazardous waste receipt/disposal facility. Given that local landfills and waste disposal facilities have adequate remaining throughput capacity to receive current and future commercial cannabis business wastes and existing and proposed regulations would ensure the appropriate management of all cannabis solid and green waste, impacts would be less than significant.

- e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. Commercial cannabis activities would be required to comply with State and local waste diversion requirements (e.g., composting requirements). Further, landfills and other waste management facilities that would serve commercial cannabis operations have adequate remaining throughput capacity to receive current and future commercial cannabis business wastes. Therefore, impacts from the proposed Project would be less than significant.

## XX. Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The County Operational Area Emergency Operations Plan establishes the emergency management organization required to respond to, and recover from, any significant emergency or disaster impacting the county, and establishes concepts associated with the management of incidents, including the organization and activation of the County/Operational Area Emergency Operations Center. The County also identifies disaster routes, which are freeway, highway, or arterial routes pre-identified for use during times of crisis. These routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas. The County does not have established evacuation routes, but it does have established evacuation centers.

The proposed Project would not directly result in new development, zoning or land use changes, or changes to open space areas. Although the proposed Project would create the

potential for a limited amount of new development associated with the establishment of new commercial cannabis operations, as previously described in Section IX, *Hazards and Hazardous Materials*, new development would be required to comply with the LACC Fire Code requirements including, but not limited to, requirements for fire evacuation plans (§ 404.2.1). Further, given that future cannabis businesses would be located on existing developed lots in commercial/mixed-use, industrial, and/or institutional zones, development of future cannabis sites would not involve activities that would require road closures that could interfere with emergency response or evacuations or involve the introduction of new development or populations in areas subject to wildfire hazards. Finally, as previously described in Section XIV, *Population/Housing*, the proposed Project would not result in significant population growth that could interfere or otherwise require changes to an adopted emergency response or evacuation plan. Therefore, impacts would be less than significant.

- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less than Significant Impact. Land throughout the county varies greatly in topography, vegetation, climate, and other factors that affect wildfire behavior. According to fire hazard mapping by CAL FIRE, as part of the FRAP, there are several areas of the unincorporated county that are classified as VHFHSZs. These zones are generally found in rural areas of the county, such as the Santa Monica Mountains, Verdugo Mountains, Fond Wilderness Reserve, and the Gypsum Canyon Wilderness. Although the exact locations of potential cannabis operations are not yet known, the possibility of their establishment in, or within proximity to, areas designated as High Fire or VHFHSZs and/or the Wildland-Urban Interface (WUI) is highly unlikely, given that future cannabis operations would be limited to existing developed sites in certain commercial/mixed-use, industrial, and institutional zones. These areas have lower wildfire risk due to lower amounts of vegetation and fuel load.

Depending on the location and site-specific conditions of commercial cannabis businesses, commercial cannabis business operations could increase the risk of ignition and spread of fire due to equipment, vehicles, tools, and the storage, handling, and use of volatile solvents or flammable material used in certain cannabis manufacturing processes. However, all commercial cannabis businesses resulting from the proposed Project would be required to comply with applicable local and State fire prevention requirements that apply generally to commercial businesses and specifically to commercial cannabis operations. For example, all businesses would need to comply with the LACC Fire Code, which requires the provision of adequate access for emergency vehicles/personnel and adequate water supply and pressure to meet flow standards. Compliance with the LACC Fire Code would also ensure that any development located within mapped VHFHSZs is properly inspected, is subject to applicable permits, and involves implementation of relevant fire prevention techniques. Cannabis businesses also would need approval from LACoFD's Fire Prevention Division that enforces various safeguards relating to commercial cannabis activities (e.g., Standard Cannabis Conditions of Approval, Regulation #30 [Cannabis Cultivation/Production Requirements for Businesses]). In addition to these local requirements, commercial cannabis businesses would



be required to comply with State regulations that apply to specific cannabis activities, such as Chapter 8, Article 3 of MAUCRSA which sets forth requirements for solvent use and safety in manufacturing processes.

Given the low probability for establishment of commercial cannabis businesses within areas of high wildfire risk, as well as required compliance with existing local and State regulatory programs, policies, and regulations, impacts would be less than significant.

- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less than Significant Impact. Potential commercial cannabis operations resulting from the proposed Project would be allowed solely on existing developed properties in eligible commercial/mixed-use, industrial, and institutional zones in the unincorporated county. As discussed above in threshold b), the operations of commercial cannabis businesses could slightly increase the risk of ignition and spread of fire, depending on specific site locations and activities (e.g., cannabis product manufacturing). However, to obtain a State and County cannabis license, applicants would need to demonstrate compliance with various rules and regulations relating to the prevention of wildfire which apply generally to new development and specifically to certain commercial cannabis activities. In addition, as previously described in Section XV, *Public Services*, the proposed Project would not result in the need for new infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or temporary or ongoing impacts to the environment. Cannabis businesses would be located in areas that the LACoFD currently serves, already have existing infrastructure (e.g., roads and utilities) to support cannabis businesses, and are not in open space, wildlands, or the wildland-urban interface. Therefore, impacts would be less than significant.

- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less than Significant Impact. In addition to the risks directly associated with wildfire, wildfires can create risks from post-wildfire-related hazards, such as debris flows, mudslides, flooding, and drainage changes. Major risk areas for these hazards include fire-scarred areas, where significant amounts of water have saturated soil and loosened material, as well as land with steep slopes and land along creeks and creek beds. Areas within the county that exhibit topographic and other features associated with such risks are mostly located in open space and wildland areas such as the Angeles National Forest, San Gabriel Mountains, and Santa Monica Mountains.

As discussed in threshold b), given that the proposed Project would limit commercial cannabis activities to only eligible commercial/mixed-use, industrial, and institutional zones, commercial cannabis businesses resulting from the proposed Project would be located in developed areas that have existing infrastructure and generally are subject to low wildfire risk and, consequently, low risk for post-wildfire hazards. In addition, commercial cannabis businesses would be required to occupy existing buildings. If new development is proposed separately, the structure

would be required to comply with both State and local fire prevention regulations, as well as drainage and flood control requirements. Finally, as discussed in Section XIV, *Population and Housing*, the proposed Project would not substantially increase population within the county. Therefore, the proposed Project would result in less than significant impacts.

- e. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than Significant Impact. Future cannabis businesses would be located within constructed and permitted structures on eligible sites in existing commercial/mixed-use, industrial, and institutional zones, some of which may overlap areas within VHFHSZs or the WUI. However, future commercial cannabis sites would be required to comply with the LACC Fire Code, which would ensure that they have adequate access (for emergency vehicles/personnel), water pressure (to meet flow standards), and other features (e.g., sprinkler systems and posted emergency exits in buildings) to reduce risks from wildland fires. Compliance with the LACC Fire Code would also ensure that any projects developed within mapped VHFHSZs are inspected, are subject to applicable permit conditions, and include additional fire prevention features (e.g., vegetation removal around combustible construction). Therefore, impacts would be less than significant.

## XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Does the project have the potential to substantially degrade the quality of the environment, 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a. Does the project have the potential to substantially degrade the quality of the environment, 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact. As discussed in this Initial Study, the proposed Project would not directly result in any new development or changes to designated open space areas or wildlands; the proposed Project could result in remodeling of existing buildings and limited structural development (e.g., new signage and reconfigured parking areas) on eligible sites in existing commercial/mixed-use, industrial, and institutional zones, and equivalent zones in certain specific plan areas. These areas are substantially built out to accommodate existing commercial and/or industrial uses. Additionally, commercial cannabis operations would be prohibited within SEAs and on designated public or open space lands. Therefore, the proposed Project would not substantially degrade the quality of the environment, cause substantial adverse impacts to the habitat or population of fish or wildlife species, eliminate plant or animal communities, or restrict the range of endangered plant and animal species.

The proposed Project would not have the potential to eliminate important examples of the major periods of California's history or prehistory. As described in Section V, *Cultural Resources*, if a constructed and permitted structure is a historic feature or located on a historic site, the proposed use and any site modifications would be required to comply with the County's Historic Preservation Ordinance, which requires properties to verify that building designs and potential activities would not adversely affect historic resources. Additionally, given that the proposed Project does not involve the construction of new buildings or grading, and would only permit cannabis uses within existing buildings, the likelihood of disturbing any paleontological resources, human remains, or other cultural resources that demonstrate periods of the State's history or prehistory is extremely low.

Therefore, the Project would have less than significant impacts.

- b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. The proposed Project would not directly result in any new development. Potential site alterations resulting from the proposed Project could include

interior remodeling of existing buildings and exterior improvements (e.g., new signage and reconfigured parking areas) on eligible sites in commercial/mixed-use, industrial, and institutional zones. When viewed in connection with the effects of past, current, and probable future projects, the proposed Project could result in cumulatively considerable impacts, particularly regarding air quality, energy use, GHG emissions/VMT/climate change, hazards/hazardous materials, hydrologic conditions, land use/planning issues, and utility services. Therefore, cumulative impacts associated with the proposed Project would be potentially significant.

- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As discussed in this Initial Study, the proposed Project would not directly permit or authorize new physical development. The proposed Project would restrict new commercial cannabis activities to existing buildings and indirect development that could result from the proposed Project would be limited to interior renovations to existing buildings and site alterations to accommodate cannabis businesses (e.g., landscaping and reconfigured parking areas) on eligible sites in commercial, industrial, and institutional zones. However, as discussed, some resource areas and hazards, such as air quality, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation, and utilities and service systems, could involve potentially significant impacts, and it is unknown at this time if they could be reduced to less than significant levels through implementation of mitigation measures.

Therefore, the proposed Project could result in potentially significant adverse effects on human beings, either directly or indirectly.