DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

LOS ANGELES COUNTY COMMERCIAL CANNABIS BUSINESS LICENSING PROGRAM

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ACRONYMS AND ABBREVIATIONS

°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
AADT	Annual Average Daily Trips
AB	Assembly Bill
ADA	Americans with Disabilities Act
AF	acre-foot
AFY	acre-feet per year
ALUC	Airport Land Use Commission
AQMP	Air Quality Management Plan
AUMA	Adult Use of Marijuana Act
AVAQMD	Antelope Valley Air Quality Management District
BACM	best available control measure
BHO	butane hash oil
BMP	Best Management Practice
C&D	construction and demolition
C-2	Neighborhood Commercial
C_2H_3Cl	vinyl chloride
C-3	General Commercial
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Safety and Health Administration
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Code
CalRecycle	California Department of Resource Recycling and Recovery
CalSites	Site Mitigation and Brownfields Reuse Program Database
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CBD	Cannabidiol
CBN	Cannabinol
CCAA	California Clean Air Act

CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CERS	California Environmental Reporting System
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CH_4	methane
CHP	California Highway Patrol
CHSC	California Health and Safety Code
C-M	Commercial Manufacturing
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CSMD	Consolidated Sewer Maintenance District
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CWC	California Water Code
DCBA	Department of Consumer and Business Affairs
DCC	Department of Cannabis Control
DHS	Department of Health Services
DPH	Department of Public Health
DPM	diesel particulate matter
DPR	Department of Pesticide Regulation
DPW	Department of Public Works
DRP	Department of Regional Planning
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
ECF	Exclusive Commercial Franchise System
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
EMFAC	Emission Factor

EO	Executive Order
EOP	Emergency Operations Plan
EPCRA	Emergency Planning and Community Right-to-Know Act
EPD	Environmental Programs Division
ESF	Emergency Support Function
ESHA	Environmentally Sensitive Habitat Area
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
FRAP	Fire and Resource Assessment Program
FTE	full-time equivalent
GDD	Garbage Disposal District
GHG	greenhouse gas
GLAC	Greater Los Angeles County
gpd	gallons per day
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
Gt	gigatons
GW	gigawatts
GWP	Global Warming Potential
H_2S	hydrogen sulfide
HCP	Habitat Conservation Plan
HFC	hydrofluorocarbon
HMA	Hillside Management Area
HMBP	Hazardous Materials Business Plan
HRA	Health Risk Assessment
HSWA	Hazardous and Solid Wastes Act
I-	Interstate
IPCC	Intergovernmental Panel on Climate Change
IRWM	Integrated Regional Water Management
IS	Initial Study
IT	Institutional
IWMP	Integrated Waste Management Plan
IWRP	Integrated Water Resources Plan
JOS	Joint Outfall System
LACC	Los Angeles County Code
LACFD	Los Angeles County Fire Department
LASAN	LA Sanitation & Environment
LAX	Los Angeles Internation Airport

LBP	lead-based paint
lbs/day	pounds per day
LCP	Local Coastal Program
LHMP	Local Hazard Mitigation Plan
LID	low impact development
LOS	Level of Service
LRA	Local Responsibility Area
LUP	Land Use Plan
LUST	Leaking Underground Storage Tank
LUSTIS	Leaking Underground Storage Tank Information System
M-1	Light Manufacturing
M-1.5	Restricted Heavy Manufacturing
M-2	Heavy Manufacturing
MAUCRSA	Medicinal and Adult-Use Cannabis Regulation and Safety Act
MCRSA	Medical Cannabis Regulation and Safety Act
MDAB	Mojave Desert Air Basin
MMRP	Mitigation Monitoring and Reporting Program
MMRSA	Medical Marijuana Regulation and Safety Act
MMT	million metric tons
mpg	miles per gallon
MPO	Metropolitan Planning Organization
MRF	Materials Recovery Facility
MT	metric ton
MWD	Metropolitan Water District of Southern California
MXD	Mixed Use Commercial Only
N_2	nitrogen
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NCCP	Natural Community Conservation Plan
NCP	National Contingency Plan
NHMRR	National Hazardous Materials Route Registry
NHTSA	National Highway Traffic Safety Administration
NO_2	nitrogen dioxide
NOA	Notice of Availability
NOAA	National Oceanic and Atmospheric Administration
NOD	Notice of Determination
NOP	Notice of Preparation
NO_X	nitrogen oxides

NPDES	National Pollution Discharge Elimination System
NPL	National Priorities List
NWL	Natural and working land
O	oxygen
O_3	ozone
OA	Operational Area
OCM	Office of Cannabis Management
OEHHA	Office of Environmental Health Hazard Assessment
OES	Office of Emergency Services
OSHA	Occupational Safety and Health Administration
Pb	lead
PCB	polychlorinated biphenyl
PFC	perfluorocarbon
PM	particulate matter
PM_{10}	respirable particulate matter 10 microns or less in diameter
$PM_{2.5}$	fine particulate matter 2.5 microns or less in diameter
ppb	parts per billion
ppm	parts per million
PRC	Public Resources Code
PV	photovoltaic
PVC	polyvinyl chloride
RCRA	Resource Conservation and Recovery Act
RCRAInfo	Resource Conservation and Recovery Act Information System
RCRIS	Resource Conservation and Recovery Act Information System
ROG	reactive organic gas
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SDWA	Safe Drinking Water Act
SEA	Significant Ecological Area
sf	square foot

SF_6	sulfur hexafluoride
SGMA	Sustainability Groundwater Management Act
SHMP	State Hazard Mitigation Plan
SIP	State Implementation Plan
SMBRP	Site Mitigation and Brownfields Reuse Program
SO_2	sulfur dioxide
SO_4^{2-}	sulfate ion
SOC	Statement of Overriding Considerations
SP	Specific Plan
SPCC	spill, prevention, control, and countermeasure
SRA	State Responsibility Area
SWP	State Water Project
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TDM	transportation demand management
THC	Tetrahydrocannabinol
TMDL	total maximum daily load
TOD	Transit Oriented District
tpd	tons per day
tpy	tons per year
USC	U.S. Code
USEPA	U.S. Environmental Protection Agency
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
UWMPA	Urban Water Management Plan Act
VMT	vehicle miles traveled
VOC	volatile organic compound
WMO	World Meteorological Organization
WUI	wildland-urban interface
$X\text{-}SO_4^{2-}$	sulfates
ZEV	zero emission vehicle

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EXECUTIVE SUMMARY

ES-1 INTRODUCTION

The County of Los Angeles (the County) is proposing to adopt a commercial cannabis permitting and licensing program that includes a social equity program (collectively, Cannabis Permitting and Licensing Program, or proposed Project). Consistent with State law, the proposed Project would regulate commercial cannabis activities within unincorporated areas of the County. The County of Los Angeles Department of Consumer and Business Affairs, Office of Cannabis Management (LA County OCM), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Environmental Impact Report (EIR) in accordance with CEQA, Public Resources Code Sections 21000 et seq., the CEQA Guidelines, California Code of Regulations, Title 14, Sections 15000 et seq., and the County's *Environmental Document Reporting Procedures and Guidelines*.

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

As a Program EIR, the level of detail included in the project description and methodology for impact analysis is relatively more general than a project-level EIR, as an individual development project and site-level details are unavailable, thereby rendering some analyses too speculative for detailed evaluation. Further, this Program EIR does not focus on any specific projects that may be implemented pursuant to the proposed Cannabis Permitting and Licensing Program. Instead, the zones in, and conditions under, which commercial cannabis activities would be allowed pursuant to the Cannabis Permitting and Licensing Program inform the analysis of potential indirect environmental impacts that could result from future commercial cannabis activities. This approach allows the County Board of Supervisors to consider broad implications and impacts associated with the proposed Project while not requiring a detailed evaluation of individual properties, business licenses, or permit applications. The proposed Cannabis Permitting and Licensing Program would allow commercial cannabis activities pursuant to a ministerial entitlement process and, consequently, the licensing and permitting of allowed commercial cannabis activities would not be subject to CEQA environmental Review (CEQA Guidelines Section 15268). However, in the event that a future discretionary action related to the Cannabis Permitting and Licensing Program (e.g., amendment to the zoning and/or business permitting regulations) requires CEQA environmental review, this Program EIR may be incorporated by reference in subsequent CEQA review documents to describe regional influences, secondary effects, and cumulative impacts.

ES-2 PROJECT OVERVIEW

The proposed Project is a regulatory program designed to manage and monitor commercial cannabis activities and operations in the unincorporated areas of the County. The proposed Project would include adoption of amendments to the Los Angeles County Code (LACC) to regulate where, how, and who may conduct commercial cannabis activities. The purpose of the program is to balance creation of a legal, sustainable cannabis industry with protection of the environment and neighborhood quality of life. Consistent with State law, the proposed Project is intended to balance the demands for cannabis and cannabis products with the health, safety, and welfare of the community and the environment.

The proposed Project applies to unincorporated regions of the County and includes amendments to the LACC Title 8 – Consumer Protection, Business and Wage Regulations and Title 22 – Planning and Zoning to allow for commercial cannabis businesses in compliance with State law and would modify certain existing standards for personal cannabis cultivation. These amendments would allow for commercial cannabis cultivation, manufacturing, distribution, retail sales, and testing on legal parcels of land in the unincorporated County, in the specific commercial, mixed-use, industrial, and institutional zones described in Chapter 2, *Project Description* of this Program EIR.

This Program EIR evaluates the proposed Project as a whole—that is, the Program EIR analyzes the potential impacts associated with future commercial cannabis activities that the proposed Cannabis Permitting and Licensing Program would allow, based on information available to the County where reasonably foreseeable, direct, and indirect physical changes in the environment could occur. The Program EIR, therefore, identifies the potential locations and consequent environmental impacts of future commercial cannabis activities based on zoning designations of property, but does not include an analysis of environmental impacts associated with commercial cannabis activities at any particular site within the zones in which commercial cannabis activities would be allowed. Although the Cannabis Permitting and Licensing Program would allow commercial cannabis activities subject to the issuance of ministerial entitlements that would not be subject to CEQA environmental review, if the County must make a discretionary decision regarding a future activity that is related to the Cannabis Permitting and Licensing Program, the activity will require CEQA environmental review.

ES-3 SUMMARY OF PROJECT OBJECTIVES

The CEQA Guidelines require that the EIR project description includes a statement of objectives sought by the Project. The primary objectives of the Cannabis Permitting and Licensing Program are to:

1. Develop a robust and economically viable legal cannabis industry to ensure production and availability of high-quality cannabis products to help meet local demands, and, as a public benefit, improve the County's tax base;

2. Provide opportunities for legal commercial cannabis cultivation, testing, packaging, transportation, distribution, manufacturing, and retail sales in appropriate unincorporated areas of the County, consistent with State law and County regulations;
3. Develop a new regulatory program allowing for the orderly development and oversight of commercial cannabis activities and businesses, consistent with State law and existing agricultural industry practices, standards, and regulations;
4. Encourage commercial cannabis businesses to operate legally and secure a license to operate in full compliance with County and State regulations, maximizing the proportion of licensed activities and minimizing unlicensed activities;
5. Provide an efficient, clear, and streamlined commercial cannabis licensing process and attainable regulations and standards to facilitate participation by commercial cannabis business in the unincorporated areas of the County;
6. Minimize adverse effects of commercial cannabis activities on the natural environment, natural resources, and wildlife, including riparian corridors, wetlands, sensitive habitats, and water resources;
7. Promote energy and resource efficiency in all cannabis activities, consistent with existing agricultural and other industry practices, standards, and regulations;
8. Establish land use requirements for commercial cannabis activities to minimize the risks associated with criminal activity, degradation of visual resources and neighborhood character, groundwater basin overdraft, obnoxious odors, noise nuisances, hazardous materials, and fire hazards;
9. Develop a regulatory program that protects the public health, safety, and welfare through effective enforcement controls (e.g., ensuring adequate law enforcement and fire protection services) for cannabis activities in compliance with State law, to protect neighborhood character and minimize potential negative effects on people, communities, and other components of the environment; and
10. Limit potential for adverse impacts on children and sensitive populations by ensuring compatibility of commercial cannabis activities with surrounding existing land uses, including residential neighborhoods, agricultural operations, youth facilities, recreational amenities, and educational institutions.

ES-4 SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

This EIR assesses the potential environmental impacts that could occur with implementation of the proposed Project. The EIR evaluates potentially significant environmental impacts including issues raised in public comments received in response to the initial study, to the Notice of Preparation (NOP), and at public workshops/hearings. This

scoping process determined that the EIR should analyze the following topics that may involve significant environmental impacts:

- Air Quality
- Energy
- Greenhouse gas emissions
- Hazards and Hazardous Materials
- Land Use/Planning
- Transportation
- Utilities/Service Systems

This EIR addresses the topics listed above and identifies potential environmental impacts associated with the proposed Project, in accordance with the provisions of the CEQA Guidelines. The EIR recommends feasible mitigation measures where necessary that would reduce or eliminate adverse environmental effects. In accordance with CEQA Guidelines Section 15128, environmental impacts related to aesthetics, agriculture and forestry, biological resources, cultural resources, geology and soils, hydrology/water quality, mineral resources, noise, population/housing, public services, recreation, tribal cultural resources, and wildfire be insignificant as discussed in the initial study and Chapter 5 (Other CEQA Considerations) of this EIR.

This EIR examines potential direct, indirect, secondary, and cumulative impacts of the proposed Project. A rigorous, CEQA-mandated process revealed these impacts through a comparison of existing conditions with conditions that would result from implementation of the proposed Project. The EIR evaluates the significance of each impact using the thresholds set forth in Appendix G to the CEQA Guidelines and after considering unique characteristics of the County (e.g., conditions that warrant consideration of environmental factors that are not addressed in the thresholds stated in Appendix G to the CEQA Guidelines). While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions:

- *Significant and Unavoidable*: Significant impacts that cannot be feasibly mitigated or avoided. No measures could be taken to avoid or reduce these adverse effects to insignificant levels. Even after application of feasible mitigation measures, the residual impact would be significant. If the proposed Project is approved with impacts that are significant and unavoidable, decision-makers are required to adopt a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 explaining why benefits of the proposed Project outweigh the potential damage caused by these significant and unavoidable impacts.
- *Less than Significant with Mitigation Incorporated*: Significant adverse impacts that can be feasibly mitigated or avoided. If the proposed Project is approved with impacts that are less than significant with mitigation incorporated, decision-makers are required to make findings pursuant to CEQA Guidelines Section 15091, stating that impacts have

been mitigated to the maximum extent feasible and the residual impact would be less than significant.

- *Less than Significant*: These are impacts that do not require mitigation or findings to be made. However, mitigation measures may still be recommended to improve consistency with the County's planning policies and regulations.
- *Cumulatively Considerable*: Impacts that could occur from the proposed Project in combination with the impacts of other past, present, and reasonably foreseeable future projects (CEQA Guidelines Section 15130). For each significant adverse cumulative impact in which the proposed Project would make a cumulatively considerable contribution, the proposed Project is considered to make a significant impact and mitigation measures are presented where feasible to reduce the proposed Project's contribution to the cumulative impact, to an insignificant level. Section 3.0.7, *Cumulative Setting and Approach to Cumulative Impact Analysis*, provides additional information regarding the methodology used in this Program EIR for analyzing cumulative impacts.
- *Residual Impacts*: Impacts that would remain after mitigation is applied. If mitigation measures cannot reduce impacts a less than significant levels, impacts are considered significant and unavoidable.
- *No Impact*: A determination that no adverse changes in the environment are expected to result from the proposed Project.

Consistent with the requirements of CEQA Guidelines Section 15130 the EIR describes cumulative impacts that could occur from the combined effect of other past, present, and reasonably foreseeable future projects.

Consistent with CEQA Guidelines Section 15126.6(d), the EIR also assesses a reasonable range of alternatives to the proposed Project, including alternatives that could feasibly attain most of the basic objectives while avoiding or substantially lessening one or more of the significant effects of the proposed Project. These alternatives include the No Project Alternative, Reduced Retail and Delivery Eligibility in Commercial and Mixed-Use Zones, and Prohibiting Volatile Manufacturing.

ES-5 NOTICE OF PREPARATION

The County issued an NOP on March 5, 2025, to request comments on the scope of the EIR. The NOP was published online, made available at eight libraries across the County, and circulated to relevant agencies, community organizations, and interested individuals in the County. The NOP also was posted in the Los Angeles County Clerk's office for 30 days and sent to the State Clearinghouse at the Governor's Office of Planning and Research to solicit statewide agency participation in determining the scope of the EIR. The County also conducted a public scoping virtual meeting on March 19, 2025, to provide an overview of the purpose and requirements of the Program EIR, including a discussion of key environmental topics to be addressed in this Program EIR. Immediately following the presentation, the County received public comments on the Project and this Program EIR. A

30-day public comment period closed on April 4, 2025. Appendix A contains the NOP and comments and input received during the review period which Los Angeles County considered in preparing the scope of this EIR (CEQA Guidelines Section 15082).

ES-6 NOTICE OF COMPLETION / NOTICE OF AVAILABILITY

The County prepared and distributed a Notice of Availability (NOA) for the Draft Program EIR to relevant agencies and interested parties within the County on February 12, 2026. The NOA provides notice of a minimum 45-day public review and comment period for the Draft Program EIR, from February 12, 2026 to March 30, 2026. The Draft Program EIR is available on OCM's website at dcba.lacounty.gov/cannabis/publiccomment and at the County of Los Angeles Department of Consumer and Business Affairs office located at 320 W. Temple St. Room G-10. Los Angeles, CA 90012. Copies of the Draft Program EIR were also made available at various County libraries and community resource centers (CEQA Guidelines Section 15087).

ES-7 SUMMARY OF PROJECT IMPACTS

Table ES-1 presents a summary of the impacts, mitigation measures, and residual impacts from implementation of the proposed Project. In summary, the proposed Project would result in significant and unavoidable Project-level and cumulative impacts related to transportation and vehicle miles traveled (VMT) even after mitigation is applied to reduce the level of impact, as described below.

> Transportation: The proposed Project would result in a significant and unavoidable impact related to vehicle miles traveled (VMT) as described in Section 3.6, *Transportation*. As discussed therein, the implementation of MM TR-1 would require mitigation of VMT impacts on a project-specific level, primarily for cannabis cultivation, non-volatile and volatile manufacturing, testing business types that generate VMT predominately from employee commuter trips. However, due the absence of project-specific details at this time, it cannot be determined that these mitigation measures alone would reduce impacts, particularly those from delivery, visitor, and inter-business transport trips, to a less than significant level. Furthermore, employer-based Transportation Demand Management (TDM) measures (e.g., rideshare, carpooling, etc.) may be difficult to implement and/or may not be effective in reducing trip generation to a level that is less than significant. No other mitigation measures are considered feasible to reduce VMT impacts of the Project.

ES-8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the proposed Project, the following alternatives were selected for analysis:

- No Project Alternative;
- Alternative 1 – Reduce Retail and Delivery Eligibility in Commercial and Mixed-Use Zones
- Alternative 2 – Prohibit Volatile Manufacturing

Under the No Project Alternative, the County would not adopt regulations or issue licenses for commercial cannabis businesses, preventing local operators from obtaining state licenses, except for certain legal nonconforming uses. While this would avoid some direct environmental impacts of the proposed program, it could lead to a rise in illicit and unregulated cannabis activities. These illegal operations, driven by high demand and limited enforcement, may result in significant environmental harm due to lack of oversight. Potential impacts include air quality degradation, increased greenhouse gas emissions, energy overuse, odor issues, and strain on utilities. Additionally, unlicensed activities could worsen land use conflicts and reduce quality of life. Overall, this alternative may not meet Project Objectives and could result in more severe environmental consequences than a regulated cannabis program.

Alternative 1 proposed limiting cannabis retail and delivery businesses to higher-intensity commercial zones (C-3 and above) and industrial zones, while prohibiting them in C-2 (Neighborhood Commercial) and Mixed-use zones. Although this approach was responsive to community concerns, such as avoiding cannabis businesses in high-visibility pedestrian areas and reducing traffic and parking impacts, it significantly narrowed the geographic areas where these businesses could operate. This restriction could lead to reduced access to legal, regulated cannabis in areas with few industrial zones, overconcentration of cannabis businesses in districts with more industrial zoning (notably Districts 1, 2, and 5), and limited distribution, undermining the goal of widespread and equitable access. Ultimately, while feasible, Alternative 1 did not meet the broader Project Objectives of promoting safe access, equity, and geographic distribution. It risked creating new challenges in land use compatibility and access equity and was therefore not selected as the preferred alternative.

Under Alternative 2, the County would prohibit volatile manufacturing businesses as an allowable commercial cannabis activity. While feasible (since existing licenses could be allocated to non-volatile manufacturers), this alternative would restrict business opportunities for companies specializing in products that require volatile extraction. It would also reduce industry diversity and eliminate microbusiness activities that rely on volatile processes. Although volatile manufacturing is less common statewide, banning it would negatively impact the County's competitiveness in the cannabis industry and limit innovation. Because it would hinder business growth and reduce the program's flexibility without significantly improving safety beyond existing regulations, this alternative was ultimately not selected.

While Alternatives 1 and 2 would reduce VMT impacts, neither of these alternatives would entirely eliminate the significant and unavoidable impacts, even with the implementation of mitigation measure (MM) TR-1. Therefore, the County has determined that the Environmentally Superior Alternative is the proposed Project, given the similar impacts across the alternatives, but the reduction in the ability of Alternatives 1 and 2 to accomplish the Project Objectives.

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
Section 3.1, Air Quality			
Impact AQ-1. The proposed Project would not conflict with or obstruct implementation of the applicable air quality plans or result in a cumulatively considerable net increase of any criteria pollutant considered in non-attainment under either the SCAQMD or AVAQMD.	Less than Significant Impact	No mitigation required.	Less than Significant
Impact AQ-2. The proposed Project would not expose sensitive receptors to substantial pollutant concentrations.	Less than Significant Impact	No mitigation required.	Less than Significant
Impact AQ-3. The proposed Project will not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people.	Less than Significant Impact	No mitigation required.	Less than Significant
Cumulative Impacts	Less than Significant Impact	No mitigation required.	Less than Significant
Section 3.2, Energy			
Impact EN-1. The proposed Project would not create a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of	Less than Significant Impact	No mitigation required.	Less than Significant

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
energy resources, during project construction or operation.			
Impact EN-2. The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less than Significant Impact	No mitigation required.	Less than Significant
Cumulative Impacts	Less than Significant Impact	No mitigation required.	Less than Significant
Section 3.3, Greenhouse Gases			
Impact GHG-1. The proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.	Less than Significant Impact	No mitigation required.	Less than Significant
Cumulative Impacts	Less than Significant Impact	No mitigation required.	Less than Significant
Section 3.4, Hazards and Hazardous Materials			
Impact HAZ-1. The proposed Project would not result in the creation of a significant hazard to the public or the	Less than Significant Impact	No mitigation required.	Less than Significant

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
environment due to the routine transport, use, or disposal of hazardous materials.			
Impact HAZ-2. The proposed Project would not 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.	Less than Significant Impact	No mitigation required.	Less than Significant
Impact HAZ-3. Although the proposed Project could result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and/or sensitive uses, compliance with existing regulations and new regulations that the proposed Project would impose on commercial cannabis businesses would prevent significant impacts associated with hazardous emissions, materials, substances, and/or wastes, to schools and/or sensitive uses.	Less than Significant Impact	No mitigation required.	Less than Significant
Impact HAZ-4. Although the proposed Project could result in the location of a	Less than Significant Impact	No mitigation required.	Less than Significant

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
commercial cannabis activity on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, compliance with existing regulations and new regulations that the proposed Project would impose on commercial cannabis businesses would prevent significant impacts associated with the creation of a significant hazard to the public or the environment.			
Impact HAZ-5. The proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.	No Impacts	No mitigation required.	No Impacts
Impact HAZ-6. The proposed Project would not result in the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	Less than Significant Impact	No mitigation required.	Less than Significant
Impact HAZ-7. The proposed Project would not result in the creation of a potentially dangerous fire hazard.	Less than Significant Impact	No mitigation required.	Less than Significant
Cumulative Impacts	No Impacts	No mitigation required.	No Impacts

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
Section 3.5, Land Use and Planning			
Impact LUP-1. The proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	Less than Significant Impact	No mitigation required.	Less than Significant
Cumulative Impacts	No Impacts	No mitigation required.	No Impacts
Section 3.6, Transportation			
Impact TR-1. The proposed Project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less than Significant Impact	No mitigation required.	Less than Significant
Impact TR-2. The proposed Project would potentially conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b).	Potentially Significant Impact	MM TR-1: Transportation Demand Management Strategies The County will require transportation demand management (TDM) strategies to mitigate impacts to the maximum extent practicable. Recommended TDM measures from the County's TIA Guidelines that may be applicable to commercial cannabis businesses include: *Commute Trip Reduction (CTR) Programs with Required Monitoring* This measure would implement a mandatory CTR program with employers. CRT programs discourage single-occupancy vehicle trips	Significant and Unavoidable

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
		and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT. *Ride Sharing Programs* This measure would implement a ridesharing program or establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips and VMT. *Subsidized or Discounted Transit Programs* This measure would provide subsidized, discounted, or free transit passes for employees to make public transit more cost competitive versus driving. Increasing the total number of public transit trips and decreasing vehicle trips would result in a reduction in VMT. *Pedestrian Network Improvements* This measure would increase the sidewalk coverage to improve pedestrian access. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT.	
Impact TR-3. The proposed Project would not substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment).	Less than Significant Impact	No mitigation required.	Less than Significant
Impact TR-4. The proposed Project would not result in inadequate emergency access.	Less than Significant Impact	No mitigation required.	Less than Significant
Cumulative Impacts	No Impacts	No mitigation required.	No Impacts

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
Section 3.7, Utilities/Service Systems			
Impact UT-1. The proposed Project would not require or otherwise result in the relocation, construction, and/or expansion of water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.	Less than Significant Impact	No mitigation required.	Less than Significant
Impact UT-2. Sufficient water supplies are available to serve the proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years.	Less than Significant Impact	No mitigation required.	Less than Significant
Impact UT-3. The proposed Project is unlikely to result in a wastewater treatment provider determination that the provider does not have adequate capacity to serve a commercial cannabis business that could result from the Project, in addition to the provider's existing commitments.	Less than Significant Impact	No mitigation required.	Less than Significant
Impact UT-4. The proposed Project would not generate solid waste that would exceed state or local standards, exceed the capacity of local infrastructure, or otherwise	Less than Significant Impact	No mitigation required.	Less than Significant

Table ES-1. Summary of Impacts, Mitigation, and Residual Impacts (Continued)

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
impair the attainment of solid waste reduction goals.			
Impact UT-5. The proposed Project would comply with federal, state, and local statutes and regulations related to solid waste.	Less than Significant Impact	No mitigation required.	Less than Significant
Cumulative Impacts	No Impacts	No mitigation required.	No Impacts

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1.0 INTRODUCTION

1.1 PROJECT OVERVIEW

The County of Los Angeles (County) has prepared this Program Environmental Impact Report (Program EIR) to evaluate the potential environmental impacts that could result from the proposed Commercial Cannabis Business Licensing Program (Project). This Program EIR has been prepared in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] §§ 21000-21189.57) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, §§ 15000-15387).

The proposed Project is a regulatory program that would allow commercial cannabis business operations in the unincorporated areas of the County. The proposed Project would include adoption of zoning and other amendments to the Los Angeles County Code (LACC) to regulate where, how, and who may conduct commercial cannabis activities. Consistent with State law, the proposed Project is intended to balance the demands for cannabis and cannabis products with the health, safety, and welfare of the community and the environment.

The proposed Project applies to unincorporated regions of the County and would involve amendments to the LACC Title 22 – Planning and Zoning and Title 8 – Consumer Protection, Business and Wage Regulations, to allow commercial cannabis businesses in compliance with State law and modify certain existing standards for personal cannabis cultivation. These proposed amendments would allow for commercial cannabis cultivation, manufacturing, distribution, retail sales, and testing in the specific commercial, industrial, institutional, and mixed-use zones described in Chapter 2, *Project Description* of this Program EIR.

1.1.1 Summary of State and County Legislation, Planning Process, and Public Outreach

In 2015, the California Legislature passed the Medical Marijuana Regulation and Safety Act (MMRSA) or Medical Cannabis Regulation and Safety Act (MCRSA), establishing a State licensing system requiring local approval for certain cannabis uses, effective January 1, 2016. On November 8, 2016, voters passed Proposition 64, commonly known as the Adult Use of Marijuana Act (AUMA), for non-medicinal cannabis activities. Subject to specified restrictions, Proposition 64 legalized cannabis under State law for use by adults 21 or older, including the cultivation of cannabis for personal use. Proposition 64 also established a State licensing scheme for commercialization of non-medical cannabis and State licenses for a range of commercial cannabis activities. Proposition 64 imposes State taxes on sales and cultivation, provides for industry licensing, and establishes standards for cannabis products. Proposition 64 also allows local jurisdictions to regulate (as well as prohibit) and tax non-medical cannabis. Senate Bill (SB) 94 that Governor Brown signed on June 27, 2017,

repealed MCRSA and merged its provisions with AUMA, thereby unifying medicinal and commercial cannabis administration now referred to as the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA). The California Department of Cannabis Control (DCC) is responsible for State licensing of commercial cannabis operations pursuant to MAUCRSA.

The County Board of Supervisors and County voters took the following actions in response to MAUCRSA:

- In June 2017, the County Board of Supervisors adopted an ordinance amending Title 22 of the County code banning cannabis businesses in the unincorporated areas of the County effective June 6, 2017. The Ordinance also established regulations for personal cannabis cultivation in conjunction with a legally established dwelling unit.
- In December 2017, the County Board of Supervisors adopted an ordinance amending Title 8 of the County Code to establish public health regulatory requirements to ensure that commercial cannabis activities are conducted in a manner that protects the health and safety of the consumer and the public. Ordinance 2017-0600 established a cannabis public health license and fee system for commercial cannabis activities that are subject to State and local laws and regulations relating to public health. The purpose of this Ordinance is to ensure that County expenses resulting from the County's inspection and enforcement of public health requirements of commercial cannabis activities are offset by the fees collected.
- In February 2022, the County Board of Supervisors passed a motion directing the Department of Consumer and Business Affairs' (DCBA) Office of Cannabis Management (OCM) to start the development and implementation of an equitable commercial cannabis licensing program in the unincorporated areas of the County.
- In November 2022, voters approved Measure C, a general tax measure that allows the County to tax cannabis businesses that are in the unincorporated areas of the County.

In order to inform the legislative actions described above, in February 2017, the County Board of Supervisors created and directed OCM to conduct community and stakeholder outreach on the issues of cannabis legalization and regulation in unincorporated Los Angeles County. As part of that outreach effort, OCM convened the Los Angeles County Advisory Working Group on Cannabis Regulation (Advisory Working Group), a 17-member voluntary working group comprised of local elected officials, public health experts, community stakeholders, and cannabis industry representatives, among others.

Advisory Working Group members met eight times from June 29, 2017, to August 31, 2017, to discuss a wide range of topics pertinent to the legalization of cannabis in California. Discussions covered youth access and exposure, public health and safety, personal use cultivation, economic development, taxation and revenue, standards for cannabis businesses, and equity concerns, among other issues. Using a consensus-based decision-making process, the Advisory Working Group's efforts produced a set of 64 recommendations intended to provide a framework for the development of regulations for

commercial and personal-use cannabis in unincorporated County areas. The Advisory Working Group published their recommendations in the *Advisory Working Group Recommendations Report* (2017) that informed the County Board of Supervisors' legislative actions described above that banned commercial cannabis activities and provided an opportunity for OCM to further consider certain recommendations in the *Advisory Working Group Recommendations Report.*

On July 13, 2021, the County Board of Supervisors directed DCBA and OCM to revisit the *Advisory Working Group Recommendations Report* and provide updated recommendations rooted in an equity framework. OCM convened County departments and partners, and met with various jurisdictions across the County, industry stakeholders, and subject matter experts to discuss topics including equity, cultivation, enforcement, public safety, licensing, planning, and taxation. Through extensive discussions and policy analysis OCM developed updated recommendations that prioritize public health and safety and address the complex intersectional issues of equity.

Following the Board of Supervisor's unanimous approval of a motion to implement these recommendations, the County began developing a commercial cannabis business licensing program in 2022. The program would be consistent with State law and establish licensing requirements, operating standards, regulations, and procedures for new commercial cannabis businesses in the County's unincorporated areas. Since 2022, OCM has hosted numerous in-person and virtual public workshops and community meetings to describe proposed regulations, answer questions, and solicit feedback from the public. These efforts included a formal 45-day public comment period (from October 1 to November 15, 2024) during which stakeholders had an opportunity to further review and comment on the draft ordinance and business operating requirements. Prior to the comment period, OCM published resources to support community engagement, including fact sheets and an interactive map displaying eligible parcels where cannabis businesses may be allowed after accounting for zoning and proposed buffers. Additionally, another virtual community meeting was held on October 23, 2024, which attracted 86 attendees and followed the same format as previous meetings, including an extended question and answer session. The input received as part of these outreach efforts resulted in the development of the proposed Commercial Cannabis Business Licensing Program that is the subject of this Program EIR.

The County commenced with the CEQA environmental analysis of the proposed Project with issuance of a Notice of Preparation (NOP)/Initial Study (IS) on March 5, 2025, which requested comments on the scope of the Program EIR. The NOP/IS was published online, made available at eight libraries across the County, and circulated to relevant agencies, community organizations, and interested individuals. The NOP/IS also was posted in the Los Angeles County Clerk's office for 30 days and sent to the State Clearinghouse at the Governor's Office of Land Use and Climate Innovation to solicit statewide agency participation in determining the scope of the Program EIR. A 30-day public comment period closed on April 4, 2025. Appendix A of this Program EIR contains the NOP/IS, and

Appendix B contains the comments received during the review period which the County considered when establishing the scope of this Program EIR (CEQA Guidelines § 15082).

1.2 PURPOSE OF THE PROGRAM EIR AND LEGAL AUTHORITY

In 1970, the State legislature enacted CEQA to disclose to decision-makers and the public the significant environmental effects of proposed activities, including ways to avoid or reduce those effects by requiring the implementation of feasible alternatives or mitigation measures. CEQA applies to all California government agencies, including local agencies when taking legislative and other discretionary actions that have the potential to adversely affect the physical environment. The proposed Project involves the adoption of a legislative program that has the potential to indirectly and adversely affect the physical environment and, therefore, the County is required to undertake the CEQA process before acting on the proposed Project. In accordance with PRC § 21067 and CEQA Guidelines §§ 15367 and 15050 through 15053, the County is the Lead Agency with authority and primary responsibility to perform the environmental review, including certification of this Program EIR. The County's *Environmental Document Reporting Procedures and Guidelines* provide definitions, procedures, and criteria to be used in the implementation of CEQA and to supplement the CEQA Guidelines with specific procedures and provisions that are unique to County operations.

This Program EIR primarily relies on the CEQA Guidelines (§§ 15064, 15065, 15382, and Appendix G) for the determination of significant environmental effects but refines and augments these thresholds as needed to account for certain features of the proposed Project and County's environmental setting. While CEQA Guidelines § 15021(a) requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including social and economic goals, in determining whether and in what manner a project should be approved.

This Program EIR is intended to serve as an informational document to inform public agencies, decision-makers, and the public about the significant environmental impacts that would potentially result from the implementation of the proposed Project. The impact analysis is conducted relative to the existing environmental conditions and regulatory setting of the County (see Section 2.2.2, *Environmental Baseline Conditions*). Based on this analysis, this Program EIR sets forth the analysis of potential impacts, evaluates feasible alternatives to the proposed Project, and mitigation measures that would avoid or reduce the potentially significant effects.

1.3 PROGRAM-LEVEL EIR ANALYSIS

This EIR is a Program EIR prepared pursuant to CEQA Guidelines § 15168. The CEQA Guidelines clarify that a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical

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

A program-level analysis for the proposed Project is appropriate in this EIR because:

- Site-specific details for all potential future commercial cannabis activities are unavailable currently, and the type, location, and intensity of future commercial cannabis activities are reasonably expected to evolve;
- The proposed Project covers a defined geographic area with regional subareas (e.g., specific plan areas) with similar land use characteristics (see Chapter 2, *Project Description*); and
- A program-level analysis provides the County with the opportunity to consider "broad policy alternatives and program-wide mitigation measures earlier in the planning process when the agency has greater flexibility to deal with basic problems or cumulative impacts" (CEQA Guidelines § 15168[b][4]).

As a Program EIR, the level of detail included in the project description and methodology for impact analysis is relatively more general than a project-level EIR, as an individual development project and site-level details are unavailable for the unknown number of future license applications occurring in the County, rendering some analyses too speculative for detailed evaluation. Although the proposed Project limits the total number of commercial cannabis activities that may occur, it is unknown how many of these activities would occur at any given time and on which specific properties cannabis uses would occur within the zones where activities would be allowed. Further, this Program EIR does not focus on any specific projects that may be implemented pursuant to the proposed Project. Instead, the proposed zoning and business licensing regulations (e.g., zones in which commercial cannabis activities would be allowed and standards that must be satisfied to obtain entitlements) and social equity program inform the analysis of environmental impacts. This approach allows the County Board of Supervisors to consider broad implications and impacts associated with the proposed Project while not requiring a detailed evaluation of impacts associated with allowing a particular commercial cannabis activity on a specific property. For example, methods to analyze the environmental effects of the proposed Project consider the effects of entitling the maximum number of commercial cannabis activities that would be allowed pursuant to the proposed Commercial Cannabis Business Licensing Program, in order to evaluate the impacts to each CEQA environmental resource area using a reasonable worst-case scenario (see Chapter 3, *Environmental Impact Analysis*).

The County recognizes that this document does not include the level of detail necessary to qualify as a Project EIR. The proposed Project would allow commercial cannabis activities pursuant to a ministerial entitlement process and, consequently, commercial cannabis

activities would not be subject to CEQA environmental review (CEQA Guidelines § 15268). However, in the event that a future discretionary action related to the proposed Project (e.g., amendment to change the zones in which cannabis uses are allowed) requires CEQA environmental review, or the Department of Cannabis Control opts to rely on this Program EIR to satisfy CEQA environmental review requirements to make a decision on a State license application for a commercial cannabis activity that the proposed Project would allow, this Program EIR may be incorporated by reference in subsequent CEQA environmental analysis to describe regional influences, secondary effects, and cumulative impacts. If it is determined that a subsequent activity is within the scope of the Program EIR and no new effects could occur or no new mitigation measures would be required, additional environmental documents may not be required if the Program EIR adequately addresses the impacts of the subsequent activity (CEQA Guidelines § 15168[c]). When a Program EIR is relied upon for a subsequent activity, the Lead Agency must incorporate applicable mitigation measures and alternatives developed in the Program EIR into the subsequent activities (CEQA Guidelines § 15168[c][3]). If a subsequent discretionary project exceeds the scope of the proposed Project (e.g., by allowing a greater number or different types of commercial cannabis activities) analyzed in this Program EIR and would have effects that are not identified in the Program EIR, subsequent environmental review would be required before the approval of the future project.

1.4 SCOPE OF ANALYSIS

This Program EIR assesses the potential environmental impacts that could occur with the implementation of the proposed Project. This Program EIR evaluates potentially significant environmental impacts including issues raised in public comments received in response to the NOP/IS and at public workshops/hearings (see Appendix B). This scoping process determined that this Program EIR should analyze the following issues:

- Air Quality
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use/Planning
- Transportation
- Utilities/Service Systems

(See also, Chapter 3, *Environmental Impact Analysis*.)

This Program EIR addresses the issues referenced above and identifies potential environmental impacts associated with the proposed Project, pursuant to the CEQA Guidelines. This Program EIR recommends feasible mitigation measures where necessary that would reduce or eliminate adverse environmental effects. In accordance with CEQA Guidelines § 15128 and as determined in the NOP/IS, the following environmental impacts would be insignificant and, therefore, are addressed in Chapter 5, *Other CEQA Considerations*: Aesthetics; Agriculture and Forestry Resources; Biological Resources; Cultural and Tribal Cultural Resources; Geology and Soils; Hydrology and Water Quality; Mineral Resources; Noise; Population/Housing; Public Services; Recreation; and Wildfire.

Consistent with the CEQA Guidelines § 15126.6(d), this Program EIR assesses a reasonable range of alternatives to the proposed Project, including alternatives that could feasibly attain most of the basic objectives while avoiding or substantially lessening one or more of the significant effects of the proposed Project (see Chapter 4, *Alternatives Analysis*).

1.4.1 Approach to Analysis

As described in detail in Chapter 2, *Project Description*, although the Commercial Cannabis Business Licensing Program would apply to the entire unincorporated County, it would allow commercial cannabis activities only in certain zones. Further, the proposed Commercial Cannabis Business Licensing Program would authorize OCM to issue a maximum of 90 business licenses. Initially, the County would issue a maximum of 10 cultivation licenses, 10 manufacturing licenses, 10 distribution licenses, 10 testing licenses, 25 delivery licenses, and 25 retail licenses with the potential to increase the number of licenses in the future. In addition, commercial cannabis activities would be subject to existing State regulations and new County requirements that would further limit uses and new development.

For example, outdoor and mixed-light cultivation would be prohibited and otherwise permissible commercial cannabis activities would be prohibited outdoors, at temporary or special events, in residential dwellings, in nonconforming buildings, within 600 feet of a youth-serving facility (e.g., schools [K-12], libraries, public parks, child day care centers, or County licensed game arcades), 600 feet of a drug abuse and recovery treatment center, or within 500 feet of an existing licensed retail storefront. Physical development of commercial cannabis sites would be subject to all applicable LACC (Title 22) zoning regulations (e.g., requirements regarding building heights, setbacks, landscaping, lighting, and parking), as modified pursuant to the proposed zoning ordinance amendments (e.g., additional limitations regarding signage and advertising for commercial cannabis activities). Finally, operators of commercial cannabis activities would be required to obtain the applicable State cannabis license and operate the commercial cannabis business in compliance with State regulations (CCR Title 4, Division 19).

Prior to issuance of the State and local licenses required for a commercial cannabis activity, either State or County staff (as applicable) would be required to verify that a proposed activity complies with all applicable requirements. In addition, operators would be required to renew their licenses and demonstrate ongoing compliance with applicable State and County regulations including proper maintenance of their premises and business operations. Therefore, the environmental analysis in this Program EIR incorporates the licensing regulations, limitations, and prohibitions that would apply to commercial cannabis activities when determining the potential type, location, and scale of physical development and resulting environmental impacts from the proposed Project.

For a more detailed description of the types of uses that the proposed Project would allow, see Chapter 2, *Project Description*. For a more detailed description of this Program EIR's

approach to the environmental impact analysis, see Chapter 3, *Environmental Impact Analysis*.

1.5 AGENCIES AND ROLES

The Program EIR process involves the following interested agencies, as specified in the CEQA Guidelines:

Lead Agency	The County is the Lead Agency as it is the agency with principal responsibility for approving or carrying out the proposed Project (CEQA Guidelines § 15367).
Responsible Agencies	The State DCC would be a responsible agency that has jurisdiction (i.e., discretionary approval authority for licenses) regarding the proposed Project (CEQA Guidelines § 15381).
Trustee Agencies	Trustee agencies include State agencies with general management authority over specified natural resources of the State when the resources may occur within the Project area, such as the California Department of Fish and Wildlife (CDFW) (CEQA Guidelines § 15386).
Other Interested Agencies	Additional agencies that may be interested in the proposed Project and its impacts but would have no authority over approval of the proposed Project or adoption may include the South Coast Air Quality Management District (SCAQMD), State Water Resources Control Board (SWRCB), Los Angeles Regional Water Quality Control Board (RWQCB), California Department of Transportation (Caltrans), County school districts, County sanitation districts and water service providers listed in 3.7, *Utilities / Service Systems*.

1.6 ENVIRONMENTAL REVIEW PROCESS

The Program EIR process has involved and will consist of the following steps, as specified in the CEQA Guidelines:

NOP/IS/Public Scoping Hearing	The County issued a NOP/IS on March 5, 2025, to request comments on the scope of this Program EIR. The NOP/IS was published online at https://dcba.lacounty.gov/cannabis/publiccomment/ and circulated to relevant agencies, community organizations, and interested individuals in the County. The NOP/IS also was posted in the Los Angeles County Clerk's office for 30 days and sent to the State Clearinghouse at the Governor's Office of Land Use and Climate Innovation to solicit statewide agency participation in determining the scope of this Program EIR. The County hosted a virtual public scoping meeting on March 19, 2025, to solicit comments from the public on the scope of this Program EIR. The 30-day review period closed on April 4, 2025. Appendix B contains the comments received during the review period which were considered when preparing the scope of this Program EIR (CEQA Guidelines § 15082).

Draft Program EIR and Public Review Period	The County prepared and distributed a Notice of Availability (NOA) for the Draft Program EIR to relevant agencies and interested parties within the County on February 12, 2026. The NOA provides notice of a minimum 45-day public review and comment period for the Draft Program EIR, from February 12, 2026 to March 30, 2026. The Draft Program EIR is available on OCM's website at dcba.lacounty.gov/cannabis/publiccomment and at the County of Los Angeles Department of Consumer and Business Affairs office located at 320 W. Temple St. Room G-10. Los Angeles, CA 90012. Copies of the Draft Program EIR were also made available at various County libraries and community resource centers (CEQA Guidelines § 15087).
Final Program EIR	The County will prepare a Final Program EIR that will include the Draft Program EIR with any necessary revisions, public comments received on the Draft Program EIR, a list of persons and entities who commented, and written responses to public comments submitted during the Draft Program EIR public review period. The Final Program EIR will be available to public agencies at least 10 days prior to the public hearing when the County Planning Commission considers recommendations regarding the Final Program EIR, and the County Board of Supervisors considers certifying the Final Program EIR. The Final Program EIR will be available for public review on the County's website (CEQA Documents - LA County Planning) the OCM website, and County libraries (CEQA Guidelines § 15089).
Program EIR Certification, Project Decision, Findings, and Statement of Overriding Considerations	The County must certify that the Final Program EIR is completed in compliance with CEQA. According to PRC § 21081, when an EIR identifies significant environmental impacts that may result from a project, the lead agency's decision-making body must make specific findings before approving the project and adopting a Statement of Overriding Considerations (SOC). The SOC must provide specific reasons in writing why the decision makers have determined that the benefits of the project make its unavoidable adverse environmental impacts acceptable (CEQA Guidelines §§ 15091-15093).
Mitigation Monitoring and Reporting Program (MMRP)	The County must adopt an MMRP for mitigation measures that are part of approval of the proposed Project (CEQA Guidelines § 15097).
Notice of Determination (NOD)	The County must file a NOD with the State Clearinghouse within five working days of the agency's action to approve the Project (CEQA Guidelines § 15094).

1.7 AREAS OF KNOWN PUBLIC CONTROVERSY

CEQA requires that an EIR identify areas of controversy known to the Lead Agency, including issues that the Lead Agency and/or the public raise (CEQA Guidelines § 15123). Based on County public hearings, community outreach performed as part of the development of the Project, the NOP/IS scoping meeting, and public comment letters

received on the NOP/IS (see Appendix B), the following environmental issues are known to be of concern, may be controversial, and are further discussed in this Program EIR.

- Air Quality
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Transportation
- Utilities/Service Systems

1.8 PROGRAM EIR CONTENTS AND DOCUMENT ORGANIZATION

The content and organization of this Program EIR are designed to meet the current requirements of CEQA and the CEQA Guidelines. The required sections are referenced along with the contents below to demonstrate compliance with CEQA.

Executive Summary (CEQA Guidelines § 15123) presents a summary of the proposed Project and alternatives, potential impacts and mitigation measures, and impact conclusions regarding growth inducement and cumulative impacts.

Table of Contents (CEQA Guidelines § 15122) provides a list of the contents included within this Program EIR.

Chapter 1, Introduction, provides an overview of the Program EIR process, describes the purpose and scope of this Program EIR, and outlines required contents and the organization of this Program EIR.

Chapter 2, Project Description (CEQA Guidelines § 15124), describes the Project area, details of the proposed Commercial Cannabis Business Licensing Program, and the Project Objectives.

Chapter 3, Environmental Impact Analysis (CEQA Guidelines §§ 15125, 15126.2, 15126.4, 15128, and 15130), describes the existing environmental conditions and regulatory framework for each environmental resource area, methods and assumptions used in the impact analysis, criteria for determining significance, impacts that would result from the proposed Project, and feasible mitigation measures that would eliminate or reduce significant impacts. "Cumulative impacts" (CEQA Guidelines § 15130) are also discussed, which describe impacts that could occur from the combined effect of past, present, and reasonably foreseeable future projects in combination with the proposed Project. For each significant adverse impact identified, mitigation measures are presented where feasible to reduce the impacts to acceptable levels. "Residual impacts" identify impact categories after mitigation is applied; in those instances, where mitigation measures cannot reduce adverse impacts to insignificant levels, impacts are categorized as significant and unavoidable.

Chapter 4, Alternatives Analysis (CEQA Guidelines § 15126.6), evaluates the environmental effects of Project alternatives, including the No Project Alternative. It also identifies the environmentally superior alternative.

Chapter 5, Other CEQA Considerations (CEQA Guidelines § 15126.2), identifies insignificant issues areas, as well as secondary impacts, potential growth-inducement, and significant and unavoidable effects.

Chapter 6, List of Preparers (CEQA Guidelines § 15129), identifies the individuals and/or organizations involved in preparing this Program EIR. This chapter includes the agencies and people consulted to ascertain information for the analysis of impacts and support for the conclusions made from the analysis.

Chapter 7, References (CEQA Guidelines § 15129), identifies the documents (printed and website references) and individuals (personal communications) consulted during the preparation of this Program EIR.

Chapter 8, Mitigation Monitoring and Reporting Program (MMRP) (CEQA Guidelines § 15091), provides a program for reporting on, or monitoring, the changes and measures that are either required as part of the adoption of the proposed Project or made as conditions of approval to avoid or substantially lessen significant environmental effects.

Technical Appendices provide information and technical studies that support the environmental analysis set forth in this Program EIR and include the NOP/IS, responses to the NOP/IS comments, and supporting technical studies.

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2.0 PROJECT DESCRIPTION

2.1 INTRODUCTION

The County of Los Angeles (County) is considering adoption of a Commercial Cannabis Business Licensing Program (Program or Project) that would allow, regulate, and monitor all cannabis businesses in unincorporated areas of the County. Pursuant to the requirements of the California Environmental Quality Act (CEQA), the County has prepared this Program Environmental Impact Report (EIR) to identify and analyze the impacts to the physical environment that would result from approval of the proposed Project. This section describes the proposed Project, which serves as the basis of the environmental analysis. It includes: the existing environmental setting for the impact analysis in this Program EIR; the background and regulatory context; key components of the proposed ordinance; approvals required to implement the proposed Project; and the County's Project Objectives.



The proposed Project identifies allowable cannabis business activities and suitable zones where these businesses can operate, while prescribing standards that balance the viability of a legal, commercial industry with community interests, environmental protection, and public services.

2.2 EXISTING SETTING

2.2.1 Project Location

The proposed Project involves adopting regulations for commercial cannabis activities in the unincorporated areas of the County. The County extends along approximately 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange County and San Bernardino County, to the north by Kern County, and to the west by Ventura County. The County also includes two offshore islands, Santa Catalina Island and San Clemente Island. The proposed Project would apply to both the inland and coastal regions of the unincorporated areas of the County, involving approximately 2,653.5 square miles that account for approximately 65 percent of the total land area of the County.

There are approximately 120-125 distinct unincorporated areas, with the largest number located in the northern part of the County. The unincorporated areas in the northern portion of the County consist of sparsely populated land, and include the Angeles National Forest, part of the Los Padres National Forest, and the Mojave Desert. The unincorporated areas in

Figure 2-1. Regional Map

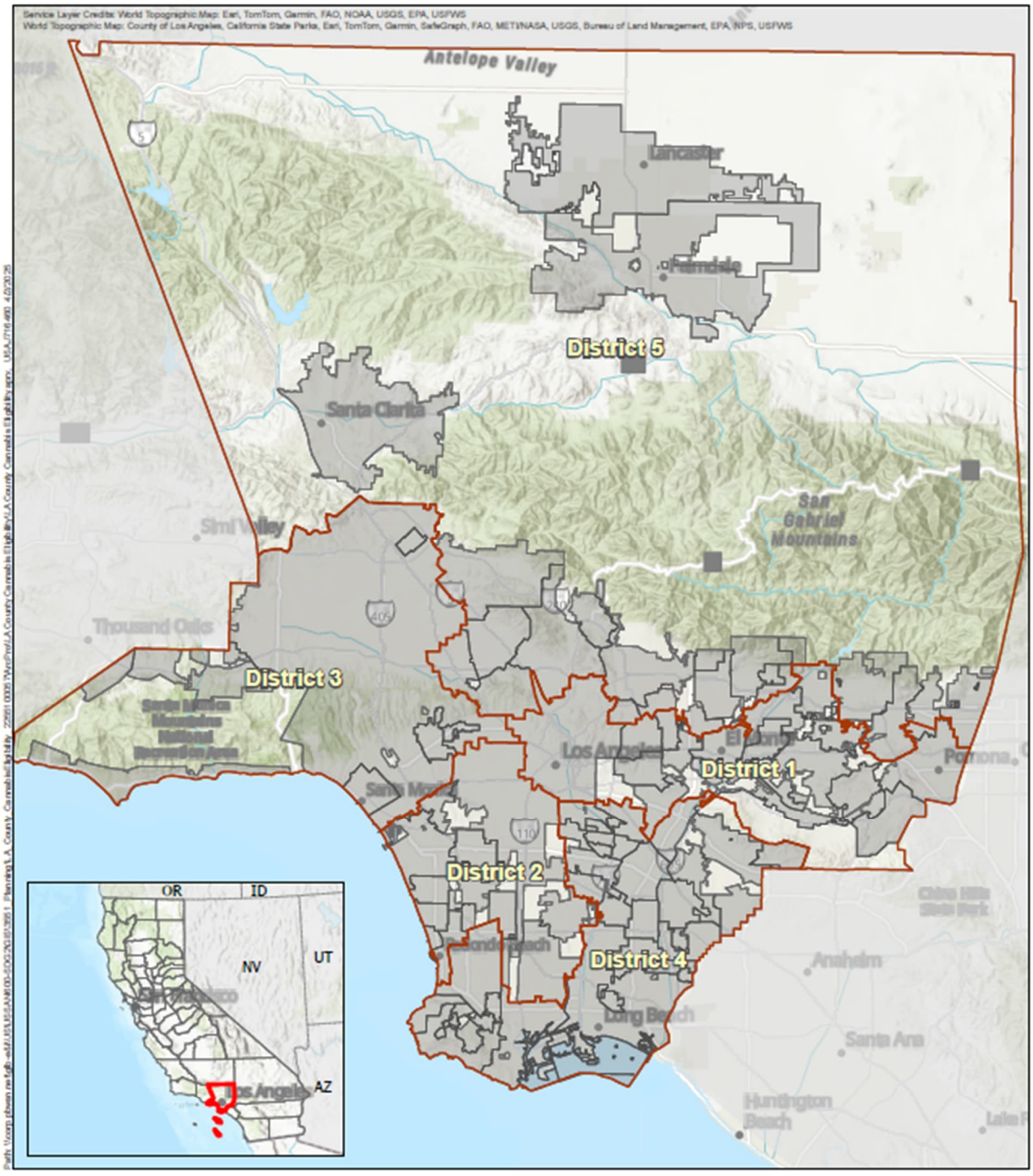


FIGURE 2-1
Regional Map
Cannabis Business Licensing Program
Los Angeles County, CA

the southern portion of the County consist of many non-contiguous, urbanized areas of land, which are often referred to as the County's unincorporated urban islands.[1]

The General Plan identifies 11 planning areas that currently are subject to 12 area, land use, or coastal plans.[2] The purpose of the Planning Areas is to provide a mechanism for local communities to work with the County to develop plans that respond to their unique and diverse character and, for the Coastal Islands Planning Area, to satisfy unique requirements of the California Coastal Act. The 12 area, land use, and coastal plans are:

- Antelope Valley Area Plan
- East San Gabriel Valley Area Plan
- Gateway Planning Area Rezoning Program
- Marina del Rey Land Use Plan
- Metro Area Plan
- Santa Catalina Island Local Coastal Plan
- Santa Clarita Valley Area Plan
- Santa Monica Mountains Land Use Plan
- Santa Monica Mountains North Area Plan
- South Bay Area Plan
- West San Gabriel Valley Area Plan
- Westside Area Plan

Unincorporated portions of these areas are dispersed throughout each of these distinct planning areas. The County identifies and characterizes each unincorporated area by the five County Supervisorial Districts.[3] (See Table 2 for identified allowable cannabis types within each Supervisorial District.)

Certain smaller geographic areas within some of the Planning Areas are subject to Community Plans that address neighborhood and/or community-level land use and planning topics. The Community Plans include the following:

- Altadena Community Plan
- Hacienda Heights Community Plan
- Rowland Heights Community Plan
- Twin Lakes Community Plan

Finally, the County has adopted 10 specific plans that articulate specific planning objectives and afford flexibility in development design for certain localities and/or characteristics of the built environment within designated areas of the unincorporated County. The specific plans provide both general planning direction and specific implementation requirements and programs to actualize the development objectives set forth in the specific plans. The specific plans consist of the following:

[1] Los Angeles County. General Plan 2035. https://planning.lacounty.gov/wp-content/uploads/2022/11/4.0_gp_final-general-plan-ch4.pdf.

[2] The San Fernando Valley Area Plan is pending.

[3] Los Angeles County. Unincorporated Areas 2021. https://file.lacounty.gov/SDSInter/lac/1129281_UnincorporatedAreas.pdf.

- Connect Southwest LA Specific Plan
- East Los Angeles 3rd Street Specific Plan
- Florence-Firestone Transit Oriented District Specific Plan
- La Vina Specific Plan
- Marina Del Rey Specific Plan
- NBC Universal Evolution Plan: Universal Studios Specific Plan and Guidelines
- Newhall Ranch Specific Plan
- Northlake Specific Plan
- West Carson Transit Oriented District Specific Plan
- Willowbrook Transit Oriented District Specific Plan

2.2.2 Environmental Baseline Conditions

Baseline conditions are defined as the physical characteristics of the environment at the time at which environmental review commences (California Environmental Quality Act [CEQA] Guidelines § 15125[a]). This environmental setting constitutes the baseline physical conditions by which the County will determine whether impacts from the proposed Project 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 are currently prohibited within the unincorporated County; there are no legal cannabis businesses in the unincorporated County. Based on County law enforcement records and complaints that the Office of Cannabis Management (OCM) received, as of June 2025, an estimated 140 illegal cannabis storefront retail businesses were operating in the unincorporated County. Precise and reliable data on existing, illegal cannabis activities in the County is difficult to obtain. Although exact estimates are unavailable, some of the operations may satisfy the requirements of the proposed Project and continue operating at the current or an alternative location.

Implementation of the proposed Project would occur within the unincorporated areas of some of the County's 11 Planning Areas:

The *Antelope Valley Planning Area* is located approximately 60 miles north of Downtown Los Angeles and includes communities like Acton, Pearblossom, Lake Los Angeles an Juniper Hills. This planning area as a whole contains the majority of the active agricultural land uses with the County. A majority of the planning area is made up of the Angeles National Forest, as well as the Antelope Valley Significant Ecological Area (SEA), San Andreas SEA, Joshua Tree Woodlands SEA, and the Santa Clara River SEA. The unincorporated areas within the planning area surround the City of Palmdale and City of

Lancaster and are located in Supervisorial District 5.[4] Unincorporated areas of Antelope Valley are predominantly rural with more affordable housing leading to siginficant residential growth in these communities. However, despite this growth, urban densities in the neighboring cities have continued to grow at a faster rate. Many residents living in the rural unincorporated areas must commute to more urban areas to access employment opportunities.

The *Coastal Islands Planning Area* includes San Clemente Island and Santa Catalina Island that are located off the California coastline and served by Supervisorial District 4.4 San Clemente Island is located approximately 63 miles south of the City of Long Beach and 78 miles west of the City of San Diego. Santa Catalina Island is located approximately 22 miles south of the Palos Verdes Peninsula and 27 miles southwest of the Orange County shoreline. The unincorporated area within this planning area includes the entirety of Santa Catalina Island, with the exception of the City of Avalon. Other unincorporated areas on the island include certain privately owned land and access roads. The island is subject to the Santa Catalina Island Local Coastal Program (LCP) which provides preservation, protection, and conservation measures for the islands open space and natural resources. San Clemente Island also is an unincoroporated area, but is not accessible to the public as it is owned and operated by the U.S. Navy and administered by Naval Base Coronado. All land use activities on San Clemente Island are regulated by the U.S. Navy.

The *East San Gabriel Valley Planning Area* contains the easternmost areas of the County served by Supervisorial Districts 1 and 5, and consists of the 24 unincorporated communities of Avocado Heights, Charter Oak, Covina Islands, East Azusa, East Irwindale, East San Dimas, Glendora Islands, Hacienda Heights, North Claremont, North Pomona, Northeast La Verne, Northeast San Dimas, Rowland Heights, South Diamond Bar, South San Jose Hills, South Walnut, Valinda, Walnut Islands, West Claremont, West Puente Valley, West San Dimas, Pellissier Village, Unincorporated South El Monte, and Unincorporated North Whittier.[5] The majority of the planning area is made up of residential communities with some industrial and commercial areas. However, some of the communities are unpopulated or have very few residences and are primarily designated open space, water resource areas, or natural land without recent human development. Undeveloped areas within the planning area include SEAs which, along with the communities within the Puente Hills SEA, face wildfire and landslide hazards. Unincorporated communities in this area are a mix of agricultural and ranching communities, residential neighborhoods consisting of primarily single-family dwellings, and industrial and commercial uses along major corridors.[6] Unincorporated

[4] LA County Supervisorial Districts (Layered Unincorporated Area Boundaries) 2021. LA County Supervisorial Districts 2021.

[5] LA County Planning. East San Gabriel Valley Area Plan 2023. 0_ESGVAP_Pub-Rev-Draft.pdf.

[6] LA County Planning. Metro Area Plan 2024. Adopted MAP with Board Resolution.pdf.

communities, such as Hacienda Heights and Rowland Heights, overlap with the portions of the Puente Hills SEA allowing for areas for recreation and open space.

The *Gateway Planning Area* is located in the southeastern portion of the County and is served by Supervisorial Districts 2 and 4. The planning area contains a number of cities, including the City of Long Beach, and a large corridor of industrial areas that lead out of the ports of Los Angeles and Long Beach into Downtown Los Angeles. Unincorporated areas within this area include communities such as Rancho Dominguez, West Whittier, South Whittier-Sunshine Acres, Cerritos Island, Long Beach Island, Lynwood Island, West Whittier-Los Nietos, and North Whittier.

The *Metro Planning Area* is located in the geographic center of Los Angeles County and served by Supervisorial Districts 1, 2, and 4. The area is home to Downtown Los Angeles that includes major corporations and professional firms, tourist and convention hotels, restaurants, retail, and the largest concentration of government offices outside of Washington D.C. Residential communities in this area often directly abut industrial uses, and face issues of overcrowding. The majority of this planning area is urbanized, with no large areas of natural open space. The unincorporated areas of this planning area include communities such as East Los Angeles that is an older, urban community, East Rancho Dominguez, West Athens-Westmont, Walnut Park, Florence-Firestone, West Rancho Domingez, and Willowbrook. In general, unincorporated communities are comprised of predominately residential uses, with remaining land serving commercial and industrial development.

The *San Fernando Valley Planning Area* is bordered by the Santa Clarita Valley and Angeles National Forest to the north, and the Santa Monica Mountains Planning Area, and the Westside Planning Area to the south. The planning area, served by Supervisorial Districts 3 and 5, is almost exclusively suburban and has a relatively small portion of unincorporated area. Cities in this planning area include Burbank and San Fernando. Unincorporated portions of this planning area are primarily low-density suburban communities such as Westhills, West Chatsworth, Twin Lakes, Sylmar Island, and Kagel/Lopez Canyons, with the exception of Oat Mountain, which is primarily vacant land except for utility facilities. Many of these unincorpoprated communities are also near environmentally-sensitive and hazardous areas that are vulnerable to wildfires.

The *Santa Clarita Valley Planning Area* is approximately 30 to 40 miles northwest of Downtown Los Angeles and is bordered by the Ventura Countly line to the west, the Los Padres National Forest to the north, and the Angeles National Forest to the north and the east. The planning area contains multiple geographic constraints to development, including large swaths of land that are covered by steep hillsides, SEAs, and Very High Fire Hazard Severity Zones (VHFHSZs). Despite these features, the planning area, served by Supervisorial District 5, has become one of the fastest growing areas in the County, including exceptionally rapid growth in the unincorporated portions of the area. Approximatelty 432 square miles (including 235 square miles within the National Forest

Boundaries) of the 480 square mile planning area is unincorporated. This planning area includes unincorporated communities such as Agua Dulce, Stevenson Ranch, Castaic, and Westridge.

The *Santa Monica Mountains Planning Area* covers the Santa Monica Mountains and the shoreline along the Pacific Coast to the Ventura County line. The planning area is served by Supervisorial District 3 and made up of County, federal, and state parks and beaches as well as privately-held conservancy land. Unincorporated areas within the area consists of smaller residential communities surrounded by steep mountains, rolling hills, canyons, streams, and oak woodlands. The unincorporated portion of the Santa Monica Mountains west of the City of Los Angeles, east of Ventura County, and south of the coastal zone boundary, excluding the City of Malibu, are located within the coastal zone and are subject to the Santa Monica Mountains LCP which sets forth coastal resource protection policies. The resource protection policies of the Santa Monica Mountains LCP complement the resource protection requirements of the Los Angeles County Significant Ecological Areas (SEAs) Program that includes, but is not limited to, resource protection regulations set forth in the LACC (Chapter 22.102). The planning area also is designated as a VHFHSZ and includes communities such as Malibou Lake, Monte Nido, Malibu Vista, Old Topanga, and Topanga, which are recovering from the January 2025 Palisades Fire event.

The *South Bay Planning Area* is located in the southwest corner of the County and is bordered on the west by the Pacific Ocean and by the north and east by the Gateway Planning Area and Metro Planning Area. This planning area is served by Supervisorial Districts 2 and 4, and is comprised of areas within the Los Angeles basin. Unincorporated portions of this area include West Carson, Westfield, Academy Hills, La Rambla, Lennox, Alondra Park, El Camino Village, Wiseburn, Hawthorne Island, and Del Aire. Many abandoned industrial sites within unincorporated West Carson have been redeveloped into multifamily residential dwellings located adjacent to active industrial sites. The unincorporated communities of Lennox and Del Aire are considered lower density residential areas and are located adjacent to LAX.

The *West San Gabriel Valley Planning Area* is bordered by the Angeles National Forest to the north and by Downtown Los Angeles and the Gateway Planning Area to the south. Interstate (I-) 605 borders the planning area to the east. The planning area, served by Supervisorial Districts 1 and 5, is made up of relatively large amounts of open space and consists almost entirely of suburban development. Some of the communities within the planning area contain environmental resources while other face hazardous constraints. Many of the foothill communities, including the Altadena Foothills and Arroyos SEA, San Gabriel Canyon SEA, and Puente Hills SEA, are designated VHFHSZs, which reflects the increased threat of wildfires and subsequent debris flows and/or mudslides within those areas (e.g., risks associated with fires such as the January 2025 Eaton Fire). Unincorporated areas include East Pasadena-East San Gabriel, La Crescenta-Montrose, Kinneloa Mesa, San Pasquel, South San Gabriel, Whittier Narros, South El Monte Island, and South Monrovia Island.

The *Westside Planning Area* covers the communities of unincorporated Marina del Rey, Ladera Heights, View Park-Winsor Hills, Marina del Rey, Del Rey, Franklin Canyon, the westside of the City of Los Angeles, and other small cites such as Santa Monica, Beverly Hills, and West Hollywood. The planning area, served by Supervisorial Districts 2 and 3, includes beaches; Ballona Creek, one of the few remaining wetlands in the County; Baldwin Hills and Kenneth Hahn State Park; and Marina del Rey, the largest, human-made small boat harbor in the country in Marina del Rey. These communities primarily consist of residential development, with commercial corridors and centers, small office campuses, and civic and educational facilities, parks, and open spaces.[7] Remaining unincoporated portions of this area, such as West Los Angeles (Sawtelle Veteran Affairs), Gilmore Island, and Ballona Wetlands, are managed by agencies, agreements, or plans other than DRP and the planning documents that it maintains and enforces. The planning area also includes the Los Angeles International Airport (LAX), which is considered one of the busiest airports in the world..

As described in detail below, commercial cannabis activities would only be allowed in existing (as of the time of application for a license), legally constructed, and permitted structures located in commercial/mixed-use, industrial, and institutional zones. Consequently, commercial cannabis activities would either 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.

2.3 PROJECT BACKGROUND AND REGULATORY CONTEXT

2.3.1 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

[7] LA County Planning. Westside Area Plan 2024. https://planning.lacounty.gov/wp-content/uploads/2024/12/Metro_Area_Plan_and_Appendices.pdf

- 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 DCC license may be required. A cannabis business must possess both local authorization 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.



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.

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/or 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).

Pursuant to the State's licensing program, cities and counties can decide which types of cannabis businesses they allow or prohibit. Currently, commercial cannabis activities are prohibited throughout the unincorporated areas of the County, but cannabis cultivation for personal use is allowed under certain conditions and pursuant to State law (LACC § 22.140.134).

Commercial cannabis activities are permissible in certain incorporated cities within Los Angeles County. In December 2017, the County Board of Supervisors approved the Cannabis Facilities Ordinance (LACC, Title 8, Part 7, and Title 11, Chapter 11.37) that authorizes the Department of Public Health (DPH) to contract with incorporated cities to issue Public Health Permits and conduct environmental health and sanitation inspections of commercial cannabis facilities licensed by those cities.

2.3.2 Project Overview

The County is considering adoption of a Commercial Cannabis Business Licensing Program that would allow, 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 would 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 establish a licensing process to allow cannabis businesses to operate in compliance with the LACC and State law in the unincorporated areas of the 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 local and State 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 impacted by cannabis prohibition and the "war on drugs."
- 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. 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:
  - Make minor, technical changes to existing standards for personal cannabis cultivation;
  - Specify the types of commercial cannabis activities that would be allowed or prohibited in each zone;
  - Establish required buffers from specified uses;
  - Enact land use regulations for each cannabis business license 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/LCP policies. County

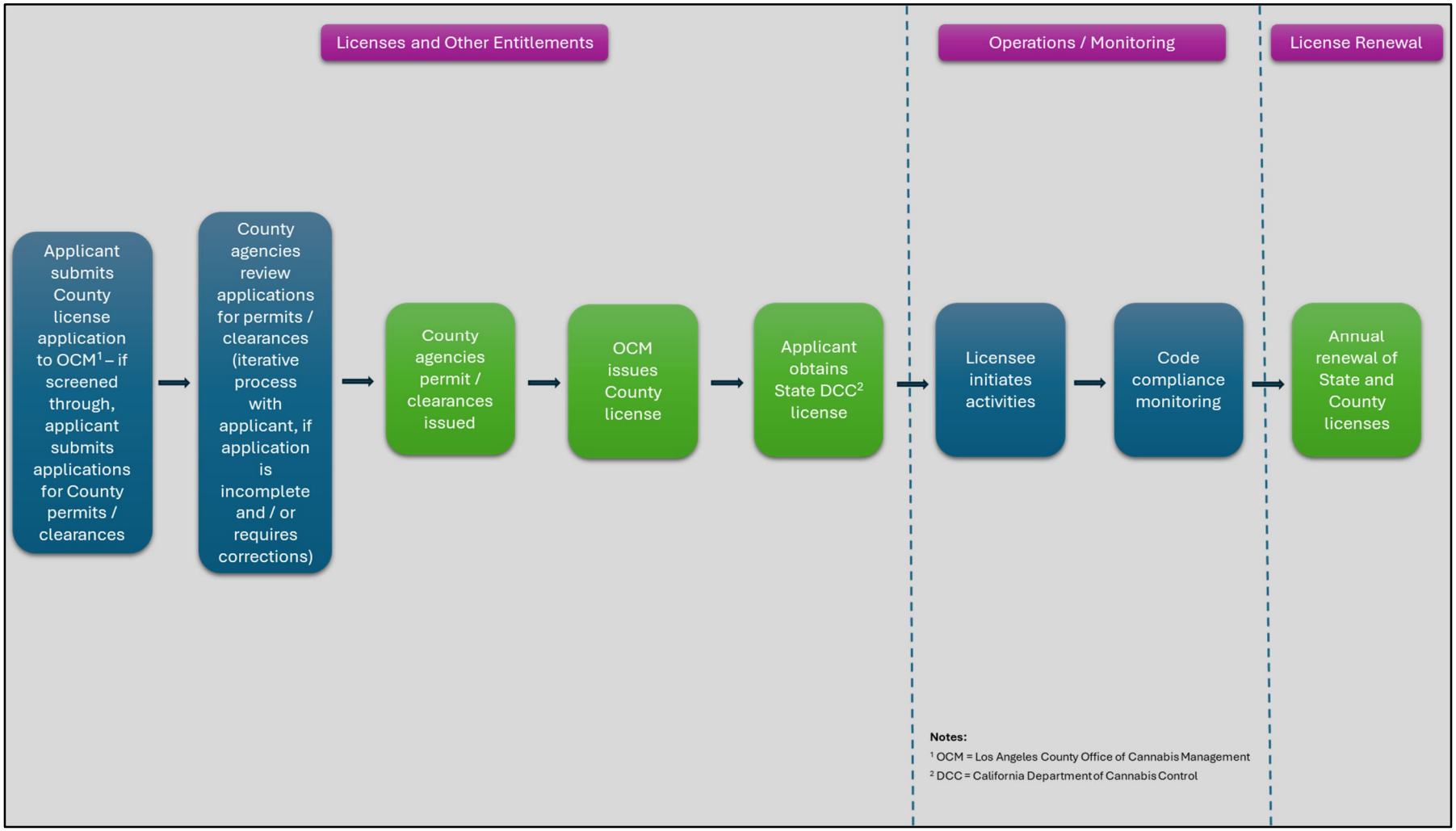
cannabis business licenses and land use permits could be issued only to cannabis businesses proposed on sites that are zoned appropriately for cannabis business per LACC Title 22 and meet all County requirements, including locational, structural, and operational requirements, as described below for each cannabis business type (see *Proposed Areas Eligible for Cannabis Business Licensing*). Figure 2-2 outlines key steps in the licensing process.

The proposed Project would authorize the County to allow cannabis businesses only in existing, legally constructed and permitted structures in conformance with the LACC. Commercial cannabis businesses would be prohibited within the same structure or on the same lot as any legally established dwelling unit, including accessory dwelling units, junior accessory dwelling units, guest quarters, mobile homes, or any other structures 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 licenses, approvals, and/or policy consistency analyses would be required before applying for a cannabis business license.

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 exterior areas of the premises free of trash, debris, junk, salvage (except in designated trash collection containers and enclosures), and graffiti. No consumption of cannabis, cannabis products, or alcohol would be allowed on the premises of licensed cannabis businesses. The sale and dispensing of alcoholic beverages or tobacco on the premises of a commercial cannabis business also would 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) in 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 the premises of a licensed cannabis business.

Figure 2-2. Licensing Process Flowchart



All cannabis business licenses would be subject to mandatory annual renewal. Any business that fails to comply with all County and State regulations may be subject to enforcement actions, including fines, license suspension, or revocation. Additionally, any change in location or ownership of a licensed cannabis business would require a new County cannabis business license and land use permit. All commercial cannabis businesses would be subject to review and inspection from law enforcement and other agents of the County and State charged with enforcement of LACC and any other State or local laws. OCM would oversee all cannabis business licensing activities with support from County departments, including but not limited to, DRP and DPH.

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 zones in the unincorporated areas of the County, as described below in Section 2.4.3, *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 areas of the 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 would 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 businesses would be allowed to continue operating, subject to all other applicable laws, rules, and regulations.

2.3.3 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 limitations and State cannabis license requirements. The County would also allow cannabis microbusinesses, which combine at least three specific allowed business activities into one business. The Project would not allow cannabis events.

The proposed Project would allow the cannabis business types described below, but only within eligible commercial/mixed-use, industrial, and institutional zones, as detailed in Section 2.4.3, *Proposed Eligible Zones for Cannabis Business Licensing*.

Cultivation

Cannabis cultivation includes the planting, growing, and harvesting of cannabis plants. Cultivation would be allowed 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 Project would allow indoor cultivation using artificial light in industrial zones in the unincorporated area of the County.

The proposed Project would allow 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 would only allow indoor cultivation. Indoor cultivation occurs only with artificial light and full suppression of natural light. Irrigation, dehumidifiers, and climate control equipment are often 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_2), ethanol, and nonhydrocarbon-based or other solvents such as water, vegetable glycerin, vegetable oil, animal fat, and glycerin.
- Volatile manufacturing. Cannabis manufacturing involving 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_2 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 allow 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.



Example of drying racks used during cannabis processing.

The proposed Project would allow 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 allow 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 allow both storefront and non-storefront retail cannabis businesses only in eligible commercial/mixed-use and industrial zones. Cannabis retailers would be the only business type licensed 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 five storefront retail and 5 non-storefront retail would be allowed within each Supervisorial District. Additionally, no more than 75 percent of available licenses could be issued within the same General Plan Planning Area. If changes to Supervisorial District or Planning Area boundaries result in more than the allowed maximum, existing retailers would be allowed to continue operating, subject to all other applicable laws, rules, and regulations.

Microbusiness

The proposed Project would allow cannabis microbusinesses that consist of 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 allow cannabis microbusinesses only in eligible commercial and industrial zones. There would not be a limit to the number of cannabis microbusiness licenses that would be 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.

2.3.4 Proposed Areas Eligible for Cannabis Business Licensing

The proposed Project would require all cannabis businesses 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 zoning within the unincorporated areas of the County, including zones in which commercial cannabis uses would be allowed, please visit: https://planning.lacounty.gov/maps-and-gis/gis-net-public/.

Eligible Base Zoning by Cannabis Business Type

Cannabis businesses would be allowed 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 2-1 and Table 2-2 summarize the eligible commercial, industrial, and institutional zones by cannabis business type.

Table 2-1. 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	-
Storefront Retail	Yes	Yes	Yes	Yes
Non-Storefront Retail (delivery)	Yes	Yes	Yes	Yes
Microbusinesses	-	-	Yes	-

Table 2-2. Allowed Cannabis Business Types in Industrial and 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
Storefront Retail	Yes	-	-	-
Non-Storefront Retail (delivery)	Yes	Yes	Yes	-
Microbusiness	Yes	Yes	Yes	-

Table 2-3. Allowable Cannabis Types in Supervisorial Districts*

Cannabis Business Type	Neighborhood Commercial (C-2)	General Commercial (C-3)	Commercial Manufacturing (C-M)	Mixed Use Commercial Only (MXD)	Light Manufacturing (M-1)	Restricted Heavy Manufacturing (M-1.5)	Heavy Manufacturing (M-2)	Institutional (IT)
Cultivation	-	-	-	-	1, 2, 3, 4, 5	1, 2, 4, 5	1, 2, 3, 4, 5	-
Distribution	-	-	1, 2, 3, 4, 5	-	1, 2, 3, 4, 5	1, 2, 4, 5	1, 2, 3, 4, 5	-
Volatile Manufacturing	-	-	-	-	1, 2, 3, 4, 5	1, 2, 4, 5	1, 2, 3, 4,5	-
Non-Volatile Manufacturing	-	1, 2, 3, 4, 5	1, 2, 3, 4, 5	-	1, 2, 3, 4, 5	1, 2, ,4, 5	1, 2, 3, 4, 5	-
Testing	-	1, 2, 3, 4, 5	1, 2, 3, 4, 5	-	1, 2, 3, 4, 5	1, 2, 4, 5	1, 2, 3, 4, 5	1, 3, 4, 5
Storefront Retail	1, 2, 3, 4, 5	1, 2, 3, 4, 5	1, 2, 3, 4, 5	2, 5	1, 2, 3, 4, 5	-	-	-
Non-Storefront Retail (delivery)	1, 2, 3, 4, 5	1, 2, 3, 4, 5	1, 2, 3, 4, 5	2, 5	1, 2, 3, 4, 5	1, 2, 4, 5	1, 2, 3, 4, 5	-
Microbusinesses	-	-	1, 2, 3, 4, 5	-	1, 2, 3, 4, 5	1, 2, 4, 5	1, 2, 3, 4, 5	-

Notes: *The eligible areas shown in this table do not account for the buffers (i.e.., areas around certain uses in which commercial cannabis activities would be prohibited, as described below in this Project Description) that would make certain areas within the zones identified in this table ineligible for certain commercial cannabis activities.



Example of packaging used for cannabis products.

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

- Connect Southwest LA Specific Plan
- East Los Angeles 3rd Street Specific Plan
- Florence-Firestone Transit Oriented District (TOD) Specific Plan
- Marina del Rey Specific Plan
- Newhall Ranch Specific Plan
- Northlake Specific Plan
- West Carson TOD Specific Plan
- Willowbrook TOD Specific Plan

Tables 2-4, 2-5, and 2-6 below identify the zones associated with the Specific Plans listed above in which commercial cannabis activities would be allowed, as well as the type of commercial cannabis activity(ies) that would be allowed.

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 and 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 a designated SEA per LACC Chapter 22.102 (Significant Ecological Areas).
- No storefront retail cannabis business may be located within 500 feet of another storefront retail cannabis business that either the County or another local jurisdiction licenses and/or the State licenses.
- Outdoor cultivation and mixed-light cannabis cultivation businesses would be prohibited.

Table 2-4. Allowed Cannabis Business Types in the Areas Subject to the East Los Angeles 3rd Street, Connect Southwest, and Florence-Firestone Transit Oriented District Specific Plans

Commercial Cannabis Activity	Connect Southwest Los Angeles Specific Plan Zones			East Los Angeles 3rd Street Specific Plan Zones					Florence-Firestone Transit-Oriented District Specific Plan Zones *										
	Neighborhood Commercial (CSLA NC)	Mixed Use Development 1 (CSLA MXD-1)	Mixed Use Development 2 (CSLA MXD-2)	Neighborhood Center (NC)	3rd Street (TOD)	Cesar Chavez Avenue (CC)	1st Street (FS)	Atlantic Blvd (AB)	C-2	C-3	C-M	IX	M-1	M-2	MXD	MU-1	MU-2	MU-3	MU-T
Cultivation, Nursery, Processing, Indoor Only	-	-	-	-	-	-	-	-	-	-	-	X	X	X	-	-	-	-	-
Distribution	-	-	-	-	-	-	-	-	-	-	X	X	X	X	-	-	-	-	-
Manufacturing, Volatile	-	-	-	-	-	-	-	-	-	-	-	-	X	X	-	-	-	-	-
Manufacturing, Nonvolatile	-	-	-	-	-	-	-	-	-	X	X	X	X	X	-	-	-	-	-
Testing	-	-	-	-	-	-	-	-	-	X	X	X	X	X	-	-	-	-	-
Retail, Storefront	X	X	X	X	X	X	X	X	X	X	X	X	X	-	X	X	X	X	X
Retail, Non-Storefront	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Microbusiness	-	-	-	-	-	-	-	-	-	-	X	X	X	X	-	-	-	-	-
Events	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Notes:
* Key to Florence-Firestone Transit-Oriented District Specific Plan Zones:
C-2 = Neighborhood Commercial
C-3 = General Commercial
C-M = Commercial Manufacturing
IX = Industrial Mix
M-1 = Light Manufacturing
M-2 = Heavy Manufacturing
MXD = Mixed-Use Development
MU-1 = Mixed-Use 1
MU-2 = Mixed-Use 2
MU-3 = Mixed-Use 3
MU-T = Mixed-Use Transit

Table 2-5. Allowed Cannabis Business Types in the Areas Subject to the Marina del Rey, Newhall Ranch, and Northlake Specific Plans

Commercial Cannabis Business Activity	Marina del Rey Specific Plan Zones		Newhall Ranch Specific Plan Zones				Northlake Specific Plan Zones		
	Visitor Serving / Convenience Commercial (VS/CC)	Office (O)	Visitor Serving (VS)	Commercial (C)	Business Park (BP)	Mixed-Use (MU)	Community Commercial (C-C)	Highway Commercial (C-H)	Light Industrial (I)
Cultivation, Nursery, Processing, Indoor Only	-	-	-	-	-	-	-	-	X
Distribution	-	-	-	-	-	-	-	-	X
Manufacturing, Volatile	-	-	-	-	-	-	-	-	X
Manufacturing, Non-Volatile	-	-	-	-	-	-	-	X	X
Testing	-	X	-	-	-	-	-	X	X
Retail, Storefront	X	-	X	X	X	X	X	X	X
Retail, Non-storefront	X	-	X	X	X	X	X	X	X
Microbusiness	-	-	-	-	-	-	-	-	X
Events	-	-	-	-	-	-	-	-	-

Table 2-6. Allowed Cannabis Business Types in the Areas Subject to the West Carson Transit Oriented District and Willowbrook Transit Oriented District Specific Plans

Commercial Cannabis Activity	West Carson Transit Oriented District Zones						Willowbrook Transit Oriented District Zones		
	Neighborhood Commercial (NC)	Unlimited Commercial (UC)	Industrial Flex (IF)	Alpine Village (APV)	Mixed Use Development 1 (MU-1)	Mixed Use Development 2 (MU-2)	Imperial Commercial	Mixed Use 1 (MU-1)	Mixed Use 2 (MU-2)
Cultivation, Nursery, Processing, Indoor Only	-	-	-	-	-	-	-	-	-
Distribution	-	-	-	-	-	-	-	-	-
Manufacturing, Volatile	-	-	-	-	-	-	-	-	-
Manufacturing, Non-Volatile	-	X	X	X	-	-	X	-	-
Testing	-	X	X	X	-	-	X	-	-
Retail, Storefront	X	X	X	X	X	X	X	X	X
Retail, Non-Storefront	X	X	X	X	X	X	X	X	X
Microbusiness	-	-	X	X	-	-	-	-	-
Events	-	-	-	-	-	-	-	-	-

- Temporary or special events where cannabis, cannabis products, or accessories for the use of cannabis or cannabis products are displayed, manufactured, or offered, either individually or in any combination, for retail sale and/or delivery would be prohibited, including any activities that create a demand for more parking spaces beyond the number of spaces required by LACC Title 22.
- Any cannabis business or use that is not expressly recognized by both a County Cannabis Business license and a State cannabis license would be prohibited.
- The sale and dispensing of alcoholic beverages or tobacco on the premises of the commercial cannabis business would be prohibited.
- The consumption of cannabis, cannabis products, or alcoholic beverages on the premises would be prohibited.
- A commercial cannabis business would not be allowed within the same structure or on the same lot as any legally established dwelling unit, including accessory dwelling units, junior accessory dwelling units, guest quarters, mobile home, or any other structure permitted for residential occupancy.
- Nonconforming buildings or structures could not be used for a commercial cannabis business.
- Banners, flags, and other portable signs would be prohibited in accordance with the requirements of LACC Chapter 22.114 (Signs) and shall not be used or displayed at any time.
- Advertising of cannabis or cannabis products would be prohibited on any interstate or state highway that crosses the California border, within a Residential or Agricultural Zone, or within 1,000 feet of the premises of any of any Youth-Oriented Use (schools, child day care centers, public libraries, public parks and recreational facilities, and licensed game arcades). However, this prohibition would not apply to outdoor advertising signs located on entirely on the premises of a licensed cannabis business.
- No testing or volatile manufacturing would be allowed for a cannabis microbusiness.

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 the applicable buffer.

Commercial cannabis businesses would be required to display the required County permits and State license(s) to operate in an accessible area where they are visible to the public and patrons and would include the following or similar statement:

- “No smoking, ingesting, applying, or otherwise consuming cannabis on the premises or in the areas adjacent to the business;” and
- “No loitering on the premises or in the areas adjacent to the business.”

All commercial cannabis businesses would be required to conduct operations entirely within an enclosed building or structure. Cannabis or cannabis products could not be stored or displayed outside, visible from exterior areas of a cannabis business, or visible from a

public or private right of way at any time, including all live plants at any stage of growth. Commercial cannabis businesses would be allowed only within a permanent structure; cannabis businesses and uses would not be allowed in a temporary or portable structure.

Commercial cannabis operators would be required to maintain premises such that:

- They are free of trash, debris, junk, and salvage in exterior areas, except in designated trash collection containers and enclosures; and
- All portions that are visible to the public including, but not limited to, any structure, wall, fence, sidewalk, curb, ground surface, vehicle, rock, or other surface, are free of graffiti.

Additional amendments to the Title 22 development standards include the following:

- Commercial cannabis operators would be required to control noise in compliance with § 12.08 (Noise Control) of Title 12 (Environmental Protection) of the LACC.
- Relocation of a commercial cannabis business to a new location would require approval of a new Ministerial Site Plan Review (LACC Chapter 22.186) application and a new or amended County Cannabis Business License in compliance with a standard to be added to Title 8 (Consumer Protection, Business and Wage Regulations) of the LACC.
- All commercial cannabis businesses would be subject to review and inspection from law enforcement and other agents of the County charged with enforcement of the LACC and any other State or local laws.

2.4 REQUIRED ACTIONS AND APPROVALS

The County is the Lead Agency for the proposed Project, consistent with CEQA Guidelines § 15065(b). As such, the County will use this Program EIR to both evaluate the potential environmental impacts that could result from the implementation of the proposed Project and develop changes in the proposed Project and/or adopt mitigation measures which would address those impacts. The County Board of Supervisors will consider adoption of the proposed Project after certification of the Final Program EIR. Pursuant to CEQA Guidelines § 15093, the decision-makers must "…balance, as applicable, the economic, legal, social, technological, or other benefits of a project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'" If the County, as Lead Agency, identifies significant and unavoidable impacts, but nevertheless approves the proposed Project, a Statement of overriding considerations must be written, which shall state the specific reasons to support its action based on the Final Program EIR and/or other information in the record.

Implementation of the proposed Project would require the following County Board of Supervisors' regulatory and/or legislative actions:

- Adoption of environmental findings, certification of the Final Program EIR, and, if needed, adoption of a Statement of Overriding Considerations for any unavoidable, significant environmental impact that will result from the proposed Project;
- Adoption of amendments to the LACC to establish a local licensing program for cannabis activities, and to address other aspects of cannabis activities; and
- Adoption of amendments to the LACC to establish the land use regulations and licensing requirements that would pertain to commercial cannabis activities.

Implementation of the proposed Project also would require the California Coastal Commission's certification of the amendments to the County's Local Coastal Program (e.g., amendments to the LACC that apply to areas within the Coastal Zone).

2.4.1 Project Objectives

The CEQA Guidelines require that this Program EIR project description include a statement of the Project's objectives. The primary objectives of the Project are to:

1. Develop a robust and economically viable legal cannabis industry to ensure production and availability of high-quality cannabis products to help meet local demands and, as a public benefit, improve the County's tax base;
2. Provide opportunities for legal commercial cannabis cultivation, testing, packaging, transportation, distribution, manufacturing, and retail sales in appropriate unincorporated areas of the County, consistent with State law and County regulations;
3. Develop a new regulatory program allowing for the orderly development and oversight of commercial cannabis activities and businesses, consistent with State law and existing agricultural industry practices, standards, and regulations;
4. Encourage commercial cannabis businesses to operate legally and secure a license to operate in full compliance with County and State regulations, maximizing the proportion of licensed activities and minimizing unlicensed activities;
5. Provide an efficient, clear, and streamlined commercial cannabis licensing process and attainable regulations and standards to facilitate participation by commercial cannabis business in the unincorporated areas of the County;
6. Minimize adverse effects of commercial cannabis activities on the natural environment, natural resources, and wildlife, including riparian corridors, wetlands, sensitive habitats, and water resources;
7. Promote energy and resource efficiency in all cannabis activities, consistent with existing agricultural and other industry practices, standards, and regulations;
8. Establish land use requirements for commercial cannabis activities to minimize the risks associated with criminal activity, degradation of visual resources and neighborhood character, groundwater basin overdraft, obnoxious odors, noise nuisances, hazardous materials, and fire hazards;
9. Develop a regulatory program that protects the public health, safety, and welfare through effective enforcement controls (e.g., ensuring adequate law enforcement and fire protection services) for cannabis activities in compliance with State law, to protect

neighborhood character and minimize potential negative effects on people, communities, and other components of the environment; and

10. Limit potential for adverse impacts on children and sensitive populations by ensuring compatibility of commercial cannabis activities with surrounding existing land uses, including residential neighborhoods, agricultural operations, youth facilities, recreational amenities, and educational institutions.

3.0 ENVIRONMENTAL IMPACT ANALYSIS

3.0.1 INTRODUCTION AND APPROACH TO ANALYSIS

This chapter of the Program Environmental Impact Report (EIR) discusses the environmental impact analysis approach, methodology, and cumulative project scenario for analysis of the County of Los Angeles (County) Commercial Cannabis Business Licensing Program (Project). This Program EIR evaluates the reasonably foreseeable environmental consequences of the proposed Project and identifies mitigation measures and alternatives that could avoid or reduce potentially significant adverse environmental impacts. Where mitigation is not feasible to reduce or avoid a potentially significant adverse environmental impact, the lack of feasible mitigation is discussed.

As described in Chapter 1, *Introduction*, potential environmental impacts are addressed programmatically in this Program EIR because the proposed Project would implement proposed amendments to the Los Angeles County Code (LACC) to make minor, technical changes to standards for personal cannabis cultivation and enable the licensing and enforcement of legal commercial cannabis businesses in the unincorporated areas of the County. The proposed Project and these implementation actions would not involve specific development plans or project proposals. Rather, this programmatic analysis considers the policies and programs that would enable the operation of legal commercial cannabis businesses in the unincorporated areas of the County, and the environmental consequences associated with operation of future licensed cannabis businesses (e.g., operational air pollutant emissions, increases in energy demand, increases in vehicle trips). While the details for future licensed commercial cannabis activities are unknown, this Program EIR estimates the reasonably foreseeable location and extent of operation of commercial cannabis businesses associated with the proposed Project based on proposed license type, limits on the number of licenses to be issued, typical cannabis business activities and operational characteristics, and zoning eligibility.

3.0.2 IMPACT ASSESSMENT GUIDELINES

The California Environmental Quality Act (CEQA) requires an EIR analysis to "…identify and focus on the significant environmental effects of a proposed project" (Public Resources Code [PRC] § 21000[a] and CEQA Guidelines § 15126.2[a]). The emphasis of the EIR should be placed on the potential "physical" adverse effects of a proposed project. CEQA Guidelines § 15360 define "environment" as the physical conditions that exist within the area that would be affected by a proposed project including, but not limited to, land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The CEQA Guidelines further define the "area involved" as the area in which significant effects would occur either directly or indirectly as a result of the project. The "environment" includes both natural and man-made conditions.

CEQA Guidelines § 15382 clarifies the definition of "significant effect on the environment" as a substantial, or potentially substantial, adverse change in any of the *physical* conditions within the area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment. However, that economic or social change that may have a *physical* impact (e.g., urban decay) should be considered in an EIR (*Bakersfield Citizens for Local Control v. City of Bakersfield [2004] 124 Cal.App.4th 1184*). The proposed Project does not propose any policies or programs that could result in big box or large regional-serving commercial uses leading to urban decay. Therefore, economic effects are not analyzed any further in this Program EIR pursuant to CEQA.

For each environmental issue area, thresholds for determining impact significance are identified based on the CEQA Guidelines and County-adopted thresholds, along with descriptions of the methodologies used for conducting the impact analysis. For some resource areas such as air quality, greenhouse gas (GHG) emissions, and transportation, the analyses of impacts are more quantitative in nature and involve the comparison of effects against adopted numerical thresholds. For other topics, such as land use and planning, the analyses of impacts are inherently more qualitative, involving the consideration of a variety of factors such as adopted County policies. Where the analysis of impacts warrants a more qualitative assessment, detailed discussion of the specific approach to methodology for assessing impacts is presented in each resource section.

3.0.3 ELEMENTS ANALYZED IN THIS PROGRAM EIR

The scope of this Program EIR is based on the Project Description outlined in Chapter 2, *Project Description*, as well as the proposed scope of analysis contained within the Notice of Preparation (NOP)/Initial Study (IS) (see Appendix A), focusing review of environmental resources that could result in potentially significant impacts. This chapter evaluates the impacts associated with the following seven environmental topics, which were determined to be potentially significant in the NOP/IS scoping process and are addressed in the following sections:

- Section 3.1, *Air Quality*
- Section 3.2, *Energy*
- Section 3.3, *Greenhouse Gas Emissions*
- Section 3.4, *Hazards and Hazardous Materials*
- Section 3.5, *Land Use and Planning*
- Section 3.6, *Transportation*
- Section 3.7, *Utilities/Service Systems*

Sections 3.1 through 3.7 provide a detailed discussion of the environmental setting, impacts associated with the proposed Project, and mitigation measures designed to reduce significant impacts where required and when feasible. The residual impacts following the implementation of any mitigation measures and cumulative impacts also are discussed.

Additionally, Chapter 5, *Other CEQA Considerations,* identifies other resource areas considered for analysis under CEQA and provides a brief discussion of why they were not analyzed in depth in this Program EIR, similar to the analysis of the topics stated above. Chapter 5, *Other CEQA Considerations* also addresses growth inducing effects of the proposed Project.

3.0.4 IMPACT ASSESSMENT METHODOLOGY

Key CEQA Principles Guiding the Program EIR Analysis

The CEQA Guidelines identify key principles that allow for a complete understanding of the environmental context, impacts analysis methods, and conclusions presented in this Program EIR. These principles are intended to inform the reader and facilitate objective and sound interpretation of the analyses and conclusions presented in the Program EIR by decision-makers. According to CEQA Guidelines § 15021, public agencies must avoid or minimize environmental damage where feasible but also balance a variety of public objectives, including economic, environmental, and social factors. In determining the significance of potential environmental effects, CEQA Guidelines § 15064 requires findings of significance of each adverse effect and indicates that findings shall be based on scientific and factual data and in consideration of substantial evidence in the whole record before a lead agency. CEQA Guidelines § 15144 notes that drafting an EIR necessarily involves some degree of forecasting, and while foreseeing the unforeseeable is not possible, an agency must use its best efforts to discover and disclose all that it reasonably foresees using a general "rule of reason." CEQA Guidelines § 15145 notes that if, after a thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate the discussion of the impact. This section deals with a difficulty in forecasting where a thorough investigation is unable to resolve an issue and the answer remains purely speculative.

Environmental Baseline

Baseline conditions are defined as the existing physical setting that the proposed Project may affect (CEQA Guidelines § 15125[a]). Baseline conditions are the local and regional physical environmental conditions as they existed at the time of the NOP/IS, which was published on March 5, 2025. This environmental setting constitutes the baseline physical conditions against which the County will determine whether impacts from the proposed Project and alternatives are significant. The impacts of the proposed Project are defined as changes to the environmental setting or baseline attributable to proposed Project components or operations. The baseline data is detailed within Section 2.2, *Existing Setting*.

Commercial cannabis activities currently are prohibited and, consequently, there are no legal cannabis businesses within the unincorporated areas of the County. Based on County law enforcement records and complaints received by the Los Angeles County Department of Regional Planning (DRP), as of June 2025, an estimated 140 illegal cannabis storefront

retail businesses were operating in the unincorporated areas of the 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 may satisfy the requirements of the proposed Project and continue operating in their current or alternative location.

However, it also is likely that new commercial cannabis businesses would be established in locations where illicit activities currently do not, or have not, occurred. Commercial cannabis businesses would be permissible in constructed and permitted buildings located in certain commercial/mixed-use, industrial, and institutional zones, provided they comply with the proposed ordinance that would further limit eligible areas within these zones and meet all State and local licensing requirements. For example, the proposed ordinance would prohibit commercial cannabis activities on: properties that have a residential use; public lands; or properties that are located within 600 feet of a school providing instruction in kindergarten or any grades one through 12, daycare center, youth center, public library, public park or recreational facility, County licensed game arcade, or non-medical alcoholism or drug abuse recovery or treatment facility. Consequently, the eligible areas of the County in which commercial cannabis activities would be allowed: are characterized by relatively dense, urban development, with building forms and other structural development that vary in size, height, bulk, and scale; currently are served by infrastructure for multimodal transportation, public services, and utilities (e.g., public drainage/flood control and sewage disposal systems); do not exhibit open space, mineral, or agricultural resources; and are unlikely to exhibit substantial paleontological, archaeological, or tribal cultural resources. The eligible zones can be further described as follows:

- Commercial/Mixed-Use Zones – Dense urban development areas such as retail, restaurants, and other public services with neighborhood and transit centers that serve daily needs of adjacent neighborhoods.
- Industrial and Institutional Zones – Typically more concentrated around major thoroughfares and highways than commercial zoning. Industrial uses are clustered around infrastructure hubs (e.g., airports) for economic viability and limit the number of sensitive uses impacted by potential uses of heavy machinery and manufacturing processes.

Assumptions Regarding Commercial Cannabis Activities

Although the proposed Project defines eligible zones for commercial cannabis activities, it cannot be determined on which specific properties within the eligible commercial/mixed-use, industrial, and institutional zones, commercial cannabis activities would be located. Further, as described in Chapter 2, *Project Description*, although the number of each license type initially would be limited, it is unclear whether all the eligible license types would be issued at any given time and whether the County Board of Supervisors would consider increasing the maximum number of any license type at some point in the future. Finally, with the exception of the maximum size of canopy that would be allowed for indoor

cultivation, there are no minimum or maximum size requirements on the buildings that commercial cannabis businesses could occupy.

However, regardless of the limitations to predicting the location and extent of commercial cannabis businesses, certain, reasonable assumptions can be made regarding probable future activities based on typical practices and operational requirements of commercial cannabis businesses located in similarly situated jurisdictions.

A detailed description of the assumptions that were used for the analysis of environmental impacts of each commercial cannabis activity (license type) that the proposed Project would allow is provided in Appendix C of this Program EIR and summarized below.

Indoor Cultivation

A typical indoor cultivation operation would include the planting, growing, and harvesting of cannabis plants using artificial lighting and irrigation, dehumidifiers, and climate control equipment to foster plant germination and growth. In addition to area(s) dedicated for cultivation, an indoor cultivation operation likely would include space for the drying and curing of cannabis; trimming and packaging cannabis; supplies storage areas; office; and amenities for employees (e.g., breakroom and restrooms).

The proposed Commercial Cannabis Business Licensing Program would limit cannabis cultivation canopy space to 22,000 square feet per lot. Therefore, the analysis of environmental impacts resulting from indoor cultivation provided in this Program EIR assumes that cannabis cultivation canopy areas would be this maximum allowed size to assess the likely "worst case scenario."

Indoor cultivation would be subject to several State regulations. Cultivators would be required to comply with any waste discharge requirements that are applicable to the operation, pursuant to the Los Angeles Water Board National Pollutant Discharge Elimination System (NPDES) program. In addition, cultivators would be required to report total electricity use for each power source used to the California Department of Cannabis Control (DCC) upon license renewal. All holders of indoor cultivation license types would be required to demonstrate that electrical power used for the indoor cultivation meets the average electricity GHG emissions intensity required by the respective local utility provider (pursuant to the California Renewables Portfolio Standard Program in Division 1, Part 1, Chapter 2.3, Article 16 of the Public Utilities Code). If a licensed cultivator's average weighted GHG emission intensity, as calculated and reported upon license renewal, is greater than the local utility provider's GHG emission intensity, the licensee must obtain carbon offsets to cover the excess in carbon emissions from the previous annual licensed period (State DCC 2023; California Code of Regulations [CCR] Title 4, § 16305).

Allowable options for cannabis waste disposal include: on-site composting; use of a local agency, waste hauler franchised or contracted by a local agency, or permitted private waste hauler; self-hauling to a location that is permitted to receive cannabis waste; or reintroduction into cultivation operations using organic waste recycling methods. Although on-site composting is a permissible method for disposing cannabis waste, operators are

unlikely to use it because indoor cultivation sites occupy small lots that lack the space required for composting.

Finally, indoor cannabis cultivation also involves the use, storage, transport, and/or discharge of hazardous materials, particularly with respect to the use of fungicides, insecticides, fertilizers, and other agricultural chemicals, the handling and disposal of which are subject to several federal, State, and local regulations depending on the type and quantity of the materials. (See Section 3.4, *Hazards and Hazardous Materials*, for a description of the regulations.)

Distribution

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

Given that distribution only facilitates the transport and temporary storage of cannabis and/or cannabis products, it is unlikely that distribution activities would result in substantial water consumption, wastewater disposal, energy consumption, and/or solid waste disposal. Water consumption would typically be limited to potable water for employees' consumption. Wastewater generation would be limited to employees' use of restroom facilities. Distribution would be limited to urbanized areas that have existing public services, and existing public utilities would provide the incremental increases in potable water and wastewater treatment services to accommodate employees who are involved with distribution activities.

Energy consumption in distribution activities could involve electric or gas energy to illuminate, heat, and cool any buildings used to store cannabis and fuel for vehicles involved in distribution. In general, cannabis and cannabis products must be stored in relatively cool, dry environments; however, the energy required to create such environments is similar to typical energy requirements for commercial, industrial, and institutional uses that currently are allowed in the zones in which distribution activities would occur. Further, given the relatively small size and light weight of cannabis and cannabis products, many distributors would rely upon vans rather than semitrucks to haul cannabis and cannabis products.

Distributors may also operate out of the same facilities that are used for other types of cannabis uses (e.g., indoor cultivation sites) or occupy a separate facility/location. Regardless of the location, distribution facilities are likely to have areas for (un)loading products; storage area(s) for securely storing cannabis and cannabis products; parking areas for transport vehicles; office; and amenities for employees (e.g., breakroom and restrooms). There are no maximum size limits for distribution facilities and, given the potential variability in business operations, there is no standard size for a distribution facility.

Manufacturing (Volatile and Non-Volatile)

Cannabis product manufacturing is defined as production, preparation, propagation, or compounding of manufactured cannabis products directly or indirectly, by extraction methods, independently by means of chemical synthesis, or by a combination of extraction and chemical synthesis at a fixed location dedicated to packaging or repackaging cannabis. This process also can involve the transition of raw cannabis into products, such as oil, rosin, hash, or tinctures, which are often used in other products, such as edibles, salves, and cosmetics. Extraction activities typically involve either solventless extraction or solvent-based extraction.

Solventless extraction involves activities such as dry-sieving, water extraction, and rosin press extraction and are unlikely to be used as part of commercial operations that the Project would allow given the amount of labor and expense associated with producing manufactured products at a commercial scale. In contrast, solvent-based extraction is more likely to occur given the relatively short time and less labor involved with it in comparison to solventless extraction. Typical solvents include ethanol, butane, propane, hexane, petroleum ether, methyl tertbutyl ether, diethyl ether, carbon dioxide, and lipids (e.g., olive oil).

Required manufacturing equipment can vary depending on the specific processes to be implemented. Manufacturing equipment for extraction can include closed loop CO_2 extraction machines, distillation machines, rosin presses, and chromatography machines. Additionally, manufacturers typically use machinery such as capsule fillers to package products. Following extraction, the products are then manufactured into tetrahydrocannabinol (THC) concentrates, edibles, topical products, and cartridges for vape pens for distribution to consumers.

Commercial manufacturing process locations can vary in size and range from a 100-sf room to a 5,000-sf warehouse floor. Given the variability in product concentrations and methodologies that may be used in manufacturing operations, the amount of water consumption involved in manufacturing processes cannot be estimated with certainty. For example, whereas use of petroleum ether or ethanol as solvents can involve the use of boiling water for extraction/separation processes, other solvents like olive oil do not require the use of boiling water for separation processes but may use water for initial extraction of cannabinoids. Similarly, the amount of wastewater that is generated will vary depending on the specific manufacturing process that is used, and the amount of energy consumption that is required would depend on the specific extraction methodology and equipment that is used in the manufacturing process.

Finally, those who engage in manufacturing may operate out of the same facilities that are used for other types of cannabis uses (e.g., indoor cultivation sites) or occupy a separate facility/location. Regardless of the location, processing facilities are likely to have areas for processing equipment; storage area(s) for securely storing cannabis and cannabis products; storage areas for hazardous and other materials used in manufacturing processes; parking

areas for transport vehicles; office; and amenities for employees (e.g., breakroom and restrooms).

Testing

Testing typically involves shipping a sample of cannabis product that is ready to be sold from the cultivator or manufacturer to the testing laboratory to conduct quality control testing pursuant to State law. Once approved, the cannabis product can be sold to consumers.

Many licensed, non-cannabis laboratories use testing methods that are similar to those that are required for the commercial cannabis industry and, consequently, are in possession of all relevant apparatus and materials necessary to comply with the State's testing criteria. There are no minimum spatial or other design requirements that apply to testing laboratories; however, the design of testing laboratories typically involves consideration of the following:

- Use of equipment including bench space, fume hoods, and biosafety cabinets
- Minimum floor-to-floor and ceiling heights
- Column-free zones
- Lab modules and structural bays
- Areas for office space, cold storage, collaboration, restrooms, breakroom(s), and any other ancillary uses/activities
- Areas for the storage of hazardous materials and waste

Given the similarities between non-cannabis and cannabis testing labs regarding the types of equipment and testing procedures that are conducted, it is possible that existing labs that currently do not test cannabis and cannabis products may expand their operations to do so. Alternatively, entirely new labs could be established to test cannabis and cannabis products. Those who possess a State testing license may not possess a license to conduct any other type of commercial cannabis activity; therefore, testing labs would not be combined with any of the other commercial cannabis activities that the proposed Project would allow.

Testing labs would also create water demand from the use of water as a reagent in testing processes, as well as water for employees' consumption and restrooms. Energy consumption would result from lighting, heating, and use of equipment in testing laboratories. Testing laboratory operations could also involve the storage, use, and handling of certain hazardous materials such as methanol and formic acid, which would be subject to federal, State, and local regulations depending on the specific type and quantity of material to be stored, used, or handled.

Retail (Storefront and Non-storefront)

Cannabis retail businesses offer direct sales of cannabis and cannabis products to consumers. There are two primary types of cannabis retail businesses:

- 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.

Typical floor plans and designs of storefront retail cannabis businesses vary based on the desired branding, customer experience, inventory management, presentation/display of products, etc., but most include the following general components: security check-in area near or at the public entrance; display area(s) for cannabis and cannabis products; locations and/or equipment for cashiers ("budtenders"); storage area(s) for products; restrooms; parking for employees and customers; (un)loading areas; employee/supplier entrance separate from the public entrance; and ancillary spaces for employees (e.g., breakroom and office).

Storefront retail establishments tend to fall within one of the following design typologies:

- Bank. As the name suggests, bank style layouts have a similar flow to a local bank, whereby products are located at stations with their own cash registers, and the customer selects products and their order is fulfilled on the spot by an employee.
- Pharmacy. The pharmacy style layout provides a similar customer experience to bank style layouts. In this design, the customers view products located in locked display cases and an employee meets them on the sales floor with a tablet or handheld device to fill a digital shopping cart for the customer. Once the customer is done shopping, the employee completes the sales transaction and the order is fulfilled in the secured back of house.
- Open Retail. The open retail layout involves the display of dummy products, or products that are locked in cases, so customers can fill their own digital shopping cart from a QR code or link on their phone as they browse. Employees will then check and enter the customer's order on the sales floor for it to be filled in the back of house. The guest checks out at a centralized pay station and receives their order.
- Kiosk. In the kiosk model, displays of products exist on the sales floor along with kiosks at which customers may place their orders. Once the order is placed, the customer works with an employee at a central terminal to complete the transaction and receive their product.

Non-storefront retail cannabis establishments do not have the same space and design requirements as storefront retail cannabis establishments, given that they are not designed for the purpose of creating a specific onsite customer experience, branding, presentation/display of products, etc. Instead, facilities are designed solely for employees' use and typically include storage area(s) for products; area(s) for assembling/packaging customer orders; restrooms; parking for employees; (un)loading areas; employee/supplier entrance(s); and ancillary spaces for employees (e.g., breakroom and office). As stated above for distribution, given the relatively small size and light weight of cannabis products,

deliveries are typically conducted using standard automobiles or vans, rather than hauling trucks.

Cannabis retail businesses could generate water demand from employees' and, in the case of storefront retail, customers' consumption of potable water and use of restrooms. In addition, cannabis retail businesses would produce wastewater from the use of restrooms. Energy consumption would result from lighting, heating, and equipment usage (e.g., computer cash registers).

Microbusinesses

The Project would allow cannabis microbusinesses that consist of 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

Given the options of cannabis activities that can constitute a microbusinesses, the physical requirements for conducting microbusinesses can vary. However, it is likely that microbusinesses would involve the same types of spatial configurations, equipment, facilities, resource consumption, and waste generation as the corresponding uses described above—albeit at a smaller scale than would occur if any of the uses constituting the microbusiness were to be licensed as standalone uses (e.g., 10,000 square feet of indoor cultivation canopy with a microbusiness license, rather than 22,000 square feet of indoor cultivation canopy with an indoor cultivation license).

3.0.5 ORGANIZATION OF ENVIRONMENTAL IMPACT ANALYSIS

Each section of this chapter (Sections 3.1 through 3.7) addresses an environmental topic and contains the following information for each component of the proposed Project:

- Introduction. Introduces the topic and provides a general approach to the assessment.
- Environmental Setting. A description of the existing environmental setting, or baseline conditions, against which the proposed Project's environmental impacts are analyzed, followed by a discussion of the applicable regulatory framework associated with the environmental topic and applicable to the proposed Project;
- Impact Assessment Methodology. A list of the impact significance thresholds and criteria applicable to the environmental topic and a description of the methodology employed in the impact analysis. The criterion or threshold for a given environmental effect is the level at which the County finds the effect to be significant. The significance criteria can be a quantitative or qualitative standard, or set of criteria, pursuant to which the significance of a given environmental effect may be determined (CEQA Guidelines § 15064.7);

- Environmental Impact Analysis. An analysis of the proposed Project impacts relative to the applicable thresholds of significance used to determine whether the proposed Project would have a significant effect on the environmental resource being addressed. While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions:
    - Significant and Unavoidable: Significant impacts that cannot be feasibly mitigated or avoided. No measures could be taken to avoid or reduce these adverse effects to insignificant levels. Even after application of feasible mitigation measures, the residual impact would be significant. If the proposed Project is approved with impacts that are significant and unavoidable, decision-makers are required to adopt a Statement of Overriding Considerations pursuant to CEQA Guidelines § 15093 explaining why benefits of the proposed Project outweigh the potential damage caused by these significant and unavoidable impacts.
    - Less than Significant with Mitigation Incorporated: Significant adverse impacts that can be feasibly mitigated or avoided. If the proposed Project is approved with impacts that are less than significant with mitigation incorporated, decision-makers are required to make findings pursuant to CEQA Guidelines § 15091, stating that impacts have been mitigated to the maximum extent feasible and the residual impact would be less than significant.
    - Less than Significant: These are impacts that do not require mitigation or findings to be made. However, mitigation measures may still be recommended to improve consistency with the County's planning policies and regulations.
    - Cumulatively Considerable: Impacts that could occur from the proposed Project in combination with the impacts of other past, present, and reasonably foreseeable future projects (CEQA Guidelines § 15130). For each significant adverse cumulative impact in which the proposed Project would make a cumulatively considerable contribution, the proposed Project is considered to make a significant impact and mitigation measures are presented where feasible to reduce the proposed Project's contribution to the cumulative impact, to an insignificant level. Section 3.0.7, *Cumulative Setting and Approach to Cumulative Impact Analysis*, provides additional information regarding the methodology used in this Program EIR for analyzing cumulative impacts.
    - Residual Impacts: Impacts that would remain after mitigation is applied. If mitigation measures cannot reduce impacts to less than significant levels, impacts are considered significant and unavoidable.
    - No Impact: A determination that no adverse changes in the environment are expected to result from the proposed Project.
- Mitigation Measures. Measures necessary to reduce potentially significant project impacts; and

- Impact Summary. Summarizes final impact determination for each resource after the implementation of mitigation measures and discloses any remaining significant and unavoidable impacts.

The proposed Project consists of the adoption of amendments to the LACC to allow commercial cannabis activities in certain areas within the unincorporated areas of the County. The proposed Project would not cause any direct environmental impacts; however, the proposed Project may result in indirect environmental impacts resulting from the new uses that would be allowed and corresponding physical development that could occur to facilitate these uses. Therefore, this Program EIR provides an evaluation of the indirect environmental impacts that would result from the proposed Project and, for impacts that would be significant, sets forth feasible mitigation measures to address the significant impacts, using the criteria described above. When identifying feasible mitigation measures, each section of this chapter of this Program EIR considers proposed LACC development standards, existing LACC requirements, and other planning policies (e.g., policies in the County's General Plan and Local Coastal Program) that would avoid or reduce potential impacts associated with the proposed Project.

3.0.6 MITIGATION MEASURES AND MONITORING

Pursuant to CEQA Guidelines § 15126.4, where potentially significant environmental impacts have been identified in the EIR, feasible mitigation measures that could avoid or minimize the severity of those impacts are also identified. The mitigation measures are identified as part of the analysis of each impact topic in Sections 3.1 through 3.7 of this Program EIR.

Feasible means "…capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines § 15364). A Lead Agency must impose mitigation measures unless findings can be made that the mitigation measures are found to be infeasible or within the jurisdiction of another agency (*City of Marina v. Board of Trustees of the California State University [2006] 39 Cal.4th 341*). Mitigation measures must be fully enforceable and may involve various means of implementation, such as:

- Measures incorporated directly into the adopted ordinance amendments as new or revised permitting requirements, licensing requirements, or development standards;
- Measures incorporated as standard conditions of approval for individual projects; and/or
- Measures implemented in multi-year County programs or development impact fee programs.

CEQA requires that implementation of adopted mitigation measures or any revisions made to the proposed Project by the Lead Agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines § 15097 require that a public agency adopt a Mitigation Monitoring and Reporting Program (MMRP) for those adopted mitigation measures and project revisions. That is, the monitoring plan may consist of policies included in plan-level documents (CEQA Guidelines § 15097[b]). The MMRP will

be provided as Chapter 8, *Mitigation Monitoring and Reporting Program* following public review and preparation of the Final EIR.

3.0.7 CUMULATIVE SETTING AND APPROACH TO CUMULATIVE IMPACT ANALYSIS

According to the CEQA Guidelines § 15130(a)(1), a "cumulative impact" consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. CEQA Guidelines § 15355 define cumulative impacts as "two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts can result from individually minor, but collectively significant, projects occurring over a period of time (CEQA Guidelines § 15355[b]). CEQA Guidelines § 15355 further state that the individual effects can be various changes related to a single project or the change involved in a number of other closely related past, present, and reasonably foreseeable future projects.

CEQA Guidelines § 15130(a) clarifies that an EIR shall "…discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable." In this context, "cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and/or the effects of probable future projects (as defined by CEQA Guidelines § 15130). The discussion of cumulative impacts must reflect the severity of the impacts as well as the likelihood of their occurrence. The standards for "significant" or "cumulatively considerable" are based on the established significance thresholds for each resource area. Per CEQA Guidelines §§ 15130(b)(1)(B) and 15130(d), consistency with the projections or requirements of previously approved local, regional, statewide, or planning documents may also be a guide to determining whether a project's impact is cumulatively significant.

CEQA Guidelines § 15130(b) identifies the following elements as necessary for an adequate discussion of cumulative effects:

- Cumulative context in the form of a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified and that described or evaluated regional or area-wide conditions contributing to the cumulative impact).
- The geographic scope of the area affected by the cumulative effect and a reasonable explanation for the geographic limitation used (see Table 3-1).
- A summary of the expected environmental effects to result from those projects with specific reference to additional information stating where that information is available.

- A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

According to the CEQA Guidelines, the discussion and evaluation of cumulative impacts need not be as detailed as the discussion of environmental impacts attributable to the proposed Project alone. Additionally, the discussion should remain practical and reasonable (i.e., not speculative) in considering other projects and related cumulative impacts. Beneficial impacts are also considered in this cumulative impact analysis. Furthermore, per CEQA Guidelines § 15130(a)(1), an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR, and that the EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant (CEQA Guidelines § 15130[a][3]). Therefore, the proposed Project would only have a significant cumulative impact if the contribution of the proposed Project to that impact is deemed to be cumulatively considerable in light of applicable thresholds of significance.

The CEQA Guidelines provide two different methods to determine the scope of projects for the cumulative impact analysis:

- List Method – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (CEQA Guidelines § 15130).
- General Plan Projection Method – A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact (CEQA Guidelines § 15130).

This Program EIR examines cumulative effects using a combination of the List and General Plan Projection methods. This approach allows for evaluation of the proposed Project in context of near-term development impacts and longer-term regional growth projections from different programs, plans, or projects that have recently been adopted in the County and adjacent cities such as Los Angeles, Burbank, and Glendale.

CEQA Guidelines Section 15130(b)(2) further states that the EIR should define the geographic scope of the area affected by the cumulative effects and provide a reasonable explanation for the geographic limitation used. The geographic scope for the analysis of cumulative impacts in this Program EIR varies by each environmental impact topic (e.g., air basin, jurisdiction, service area). For many of the impact topics analyzed in this Program EIR, the geographic scope was determined to be limited to the unincorporated areas of the County. However, impact topics such as air quality, GHGs, land use and planning, and transportation have a more regional geographic scope that encompasses a larger area or includes incorporated areas.

Table 3-1. Geographic Context for Cumulative Analysis by Topic Area

Environmental Topic Area	Geographic Context for Cumulative Analysis
Air Quality	South Coast Air Basin
Energy	Unincorporated Area of Los Angeles County
Greenhouse Gases	South Coast Air Basin, State of California, United States, Global
Hazards and Hazardous Materials	Eligible Zones and Immediately Surrounding Areas
Land Use and Planning	Unincorporated Area of Los Angeles County, Southern California Association of Governments (SCAG) Planning Region
Noise	Eligible Zones and Immediately Surrounding Areas
Transportation	SCAG Planning Region
Utilities/Service Systems	Unincorporated Area of Los Angeles County

Table 3-2, *Cumulative Projects List*, provides the projects that were included in the analysis cumulative impacts.

Table 3-2. Cumulative Projects List

Name/Title		Description	Status
1	East San Gabriel Valley Area Plan	The project updates zoning and land-use maps to align with policy, direct growth near transit corridors, protect natural resources, and fulfill the Housing Element Rezoning Program. It will also refine maps to clarify Green Zones Ordinance coverage and amend ordinances—adding new area-wide rules and updating existing standards—to carry out the Area Plan's goals.	Adopted and Final EIR certified May 21, 2024; effective June 20, 2024
2	Gateway Planning Area Rezoning Program	To meet state housing mandates and L.A. County's Regional Housing Needs Allocation (RHNA), the program makes three key land-use changes in the unincorporated communities of South Whittier–Sunshine Acres and West Whittier–Los Nietos: • General Plan Amendment – Reclassifies 58 parcels from General Commercial to Mixed Use, enabling higher-density residential development. • Zone Changes – Updates zoning on 1,315 parcels to match the new land-use designations. • Zoning Ordinance Amendment (Title 22) – Requires an affordable-housing set-aside on specified parcels identified in the 2021-2029 Housing Element. Together, these actions ensure sufficient, appropriately zoned sites for new housing in the Gateway Planning Area.	Adopted and Final EIR certified November 21, 2023; effective December 21, 2023
3	San Fernando Valley Area Plan	The project will: (1) analyze land use in unincorporated areas and coordinate with neighboring jurisdictions; (2) plan transportation upgrades vital to the area's economy; and (3) address wildfire, landslide, and biodiversity concerns, safeguarding the San Fernando Valley's Significant Ecological Areas.	Drafting goals and policies; estimated complete April 2028
4	South Bay Area Plan	The project rezones—but does not compel redevelopment—across four tracks: • Housing Element implementation: 145 parcels in Alondra Park/El Camino Village, La Rambla, Lennox, and Wiseburn rezoned for mixed-use to meet RHNA targets.	Adopted and Final EIR certified March 11, 2025

Name/Title		Description	Status
		• Transit-oriented growth: 282 parcels within ½ mile of the Aviation/LAX Metro station rezoned; West Carson TOD Specific Plan streamlined. • Technical cleanup: 1,363 parcels county-wide rezoned or re-designated to align land-use policy with zoning. • Transitioning uses: 17 West Carson parcels shifted from small-scale industrial to community-serving commercial, better matching nearby housing.	
5	West San Gabriel Valley Area Plan	The West San Gabriel Valley Area Plan (WSGVAP) amends the County General Plan, zoning maps, and Title 22 to steer walkable, connected, and vibrant growth in nine unincorporated communities. Built on a comprehensive land-use analysis and broad stakeholder outreach, the plan sets long-range goals, policies, and actions to guide development across the West San Gabriel Valley.	Adopted and Final EIR certified March 11, 2025; effective April 11, 2025
6	Westside Area Plan	Adopted March 11, 2025, the Westside Area Plan (WSAP) amends the General Plan, updates land-use and zoning maps, and revises Title 22. Covering nine unincorporated communities, the long-range plan sets a vision, goals, policies, and actions that promote walkability, connectivity, and vibrant neighborhoods. It rests on a detailed land-use analysis and extensive collaboration with residents, businesses, agencies, and neighboring jurisdictions.	Adopted and Final EIR certified March 11, 2025; effective April 11, 2025

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3.1 AIR QUALITY

Impacts to air quality could result from atmospheric discharges of pollutants produced by sources involved in facility construction and operation. A significant air quality impact would occur if anticipated emissions of criteria pollutants exceeded adopted thresholds, or if sensitive receptors would be exposed to other emissions such as toxic air contaminants or noxious odors. Sources of emissions involved in construction activities include heavy-duty off-road equipment, fugitive dust and vapors, and on-road vehicle trips; however, the proposed Commercial Cannabis Business Licensing Program (Project) would not facilitate substantial new site development and/or redevelopment. Therefore, the proposed Project would not result in any significant construction-related emissions. Operational emissions would be predominantly attributed to mobile source vehicle trips by employees and patrons, and additional emissions associated with facility maintenance vehicles and equipment and other energy and area sources. Net increases in pollutant emissions generated from the operation of the proposed Project would not exceed applicable thresholds. Impacts on air quality would be less than significant.

This section analyzes the potential for implementation of the Commercial Cannabis Business Licensing Program (Project) to facilitate the generation of criteria air pollutants emissions and toxic air contaminants (TACs) that would cause significant impacts to the environment pertaining to public health and nuisances or contributed to potential conflicts with implementation of applicable Air Quality Management Plans (AQMPs).

A summary of the impacts related to air quality identified in this Section is provided in Table 3.1-1.

Table 3.1-1. Air Quality Summary of Impacts

Air Quality Impacts	Mitigation Measures	Impact Classification
Impact AQ-1. The proposed Project would not conflict with or obstruct implementation of the applicable air quality plans or result in a cumulatively considerable net increase of any criteria pollutant considered in non-attainment under either the SCAQMD or AVAQMD.	None required	Less than significant
Impact AQ-2. The proposed Project would not expose sensitive receptors to substantial pollutant concentrations.	None required	Less than significant
Impact AQ-3. The proposed Project would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people.	None required	Less than significant

Air Quality Impacts	Mitigation Measures	Impact Classification
Cumulative Impacts	None required	Less than significant

3.1.1 Topical Background

In the U.S., air quality is primarily characterized by ambient ground-level concentrations of seven specific pollutants that the U.S. Environmental Protection Agency (USEPA) identifies to be of concern with respect to health and welfare of the public. These specific pollutants – known as "criteria air pollutants" – are pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal ambient concentration criteria are known as the National Ambient Air Quality Standards (NAAQS), and the California ambient concentration criteria are referred to as the California Ambient Air Quality Standards (CAAQS). Federal criteria air pollutants include ground-level ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), respirable particulate matter 10 microns or less in diameter (PM_{10}), fine particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and lead (Pb). Table 3.1-2 shows the NAAQS and CAAQS concentrations for the criteria air pollutants with the corresponding averaging times. The following descriptions of each criteria air pollutant and their health effects are based on information provided by the USEPA.

Table 3.1-1. Criteria Air Pollutant Standards

Pollutant	Averaging Period	Federal (NAAQS)	California (CAAQS)
Ozone (O_3)	1-Hour Average	--	0.09 ppm (180 µg/m^3)
	8-Hour Average	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)
Carbon Monoxide (CO)	1-Hour Average	35.0 ppm (40 mg/m^3)	20.0 ppm (23 µg/m^3)
	8-Hour Average	9.0 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)
Nitrogen Dioxide (NO_2)	1-Hour Average	100.0 ppb (188 µg/m^3)	0.18 ppm (339 µg/m^3)
	Annual Arithmetic Mean	53.0 ppb (100 µg/m^3)	0.030 ppm (57 µg/m^3)
Sulfur Dioxide (SO_2)	1-Hour Average	75 ppb (196 µg/m^3)	0.25 ppm (655 µg/m^3)
	24-Hour Average	0.14 ppm (365 µg/m^3)	0.04 ppm (105 µg/m^3)
	Annual Arithmetic Mean	0.030 ppm (80 µg/m3)	--

Pollutant	Averaging Period	Federal (NAAQS)	California (CAAQS)
Respirable Particulate Matter (PM_{10})	24-Hour Average	150.0 µg/m^3	50.0 µg/m^3
	Annual Arithmetic Mean	--	20.0 µg/m^3
Fine Particulate Matter ($PM_{2.5}$)	24-Hour Average	35.0 µg/m^3	--
	Annual Arithmetic Mean	9.0 µg/m^3	12.0 µg/m^3
Lead (Pb)	30-day Average	--	1.5 µg/m^3
	Rolling 3-Month Average	0.15 µg/m^3	--
Visibility Reducing Particulates	8-Hour Average	No Federal Standards	--
Sulfates	24-Hour Average		25.0 µg/m^3
Hydrogen Sulfide	1-Hour Average		0.03 ppm (42 µg/m^3)
Vinyl Chloride	24-Hour Average		0.01 ppm (26 µg/m^3)

Source: South Coast Air Quality Management District 2016.
Notes: "—" = no federal standard exists; ppb = parts per billion; ppm = parts per million; µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter.

Federal and State Criteria Air Pollutants

Ozone (O_3) is a colorless gas with a sharp odor and is a highly reactive form of oxygen. High O_3 concentrations exist naturally in the stratosphere. However, it is also formed in the atmosphere when volatile organic compounds (VOC) and nitrogen oxides (NO_X) react in the presence of ultraviolet sunlight (also known as smog). The primary sources of VOC and NO_X, the components of O_3, are automobile exhaust and industrial sources. Some mixing of stratospheric O_3 downward through the troposphere to the Earth's surface does occur; however, the extent of O_3 transport is limited.

The propensity of O_3 to react with organic materials makes it damaging to living cells and causes negative health effects. O_3 enters the human body primarily through the respiratory tract and causes respiratory irritation and discomfort, makes breathing more difficult during exercise, and reduces the respiratory system's ability to remove inhaled particles and fight infection. Individuals exercising outdoors, children and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for O_3 effects (USEPA 2025b).

Respirable and Fine Particulate Matter (PM_{10} and $PM_{2.5}$) refers to particles small enough to be inhaled into the deepest parts of the lung, which are of great concern to public health. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Emissions of $PM_{2.5}$ result from fuel combustion (e.g., motor vehicles, power generation and industrial facilities),

residential fireplaces and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC.

Respirable particles (particles less than 10 microns in diameter, denoted as PM_{10}) can accumulate in the respiratory system and aggravate health problems such as asthma, bronchitis, and other lung diseases. Children, the elderly, exercising adults, and those suffering from asthma are especially vulnerable to adverse health effects of particulate matter. A consistent correlation between elevated ambient fine particulate matter (particles less than 10 microns in diameter, denoted as $PM_{2.5}$) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the U.S. and various areas around the world. Studies have reported an association between long-term exposure to air pollution dominated by $PM_{2.5}$ and increased mortality, reduction in lifespan, and an increased mortality from lung cancer (USEPA 2025a).

Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions, to school and kindergarten absences, to a decrease in respiratory function in children who otherwise do not have respiratory ailments, and to increased medication use in children and adults with asthma. Studies also have shown that lung function growth in children is reduced with long-term exposure to particulate matter. In addition to children, the elderly, and people with pre-existing respiratory and/or cardiovascular disease, appear to be more susceptible to the effects of PM_{10} and $PM_{2.5}$ (USEPA 2025a).

Carbon Monoxide (CO) is a colorless, odorless, relatively inert gas. It is a trace constituent in the unpolluted troposphere and is produced by both natural processes and human activities. In remote areas far from human habitation, CO occurs in the atmosphere at an average background concentration of 0.04 parts per million (ppm), primarily as a result of processes such as forest fires and the oxidation of methane (CH_4). Global atmospheric mixing of CO from urban and industrial sources creates higher background concentrations (up to 0.20 ppm) near urban areas. The major source of CO in urban areas is incomplete combustion of carbon-containing fuels, mainly gasoline (USEPA 2009).

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart. Inhaled CO does not directly harm the lungs but affects tissues by interfering with oxygen transport; competing with oxygen to combine with hemoglobin in the blood and form carboxyhemoglobin. Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes (USEPA 2009).

Nitrogen Dioxide (NO_2) is a reddish-brown gas with a bleach-like odor and is responsible for the brownish tinge of polluted air. Nitric oxide (NO) is a colorless gas, formed from

nitrogen (N_2) and oxygen (O) under conditions of high temperature and pressure which are generally present during combustion of fuels (e.g., motor vehicles); NO reacts rapidly with the oxygen in air to form NO_2. The two gases, NO and NO_2, are referred to collectively as NO_X. In the presence of sunlight, atmospheric NO_2 reacts and splits to form a NO molecule and an oxygen atom. The oxygen atom can react further to form O_3, via a complex series of chemical reactions involving hydrocarbons (USEPA 2024a).

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO_2 at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California (fewer or no stoves). In healthy subjects, an increase in resistance to air flow and airway contraction is observed after short-term exposure to NO_2. Individuals with asthma and/or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) experience greater declines in lung function than healthy individuals, indicating increased susceptibility in these sub-groups. More recent studies have found associations between NO_2 exposures and cardiopulmonary mortality, decreased lung function, respiratory symptoms, and emergency room asthma visits (USEPA 2024a).

Sulfur Dioxide (SO_2) is a colorless gas with a sharp odor. It reacts in air to form sulfuric acid, which contributes to acid precipitation, and sulfates, which are components of particulate matter. Main sources of SO_2 include coal and oil used in power plants and industries. Brief exposure to low levels of SO_2 can result in airway constriction in some asthmatics. All asthmatics are sensitive to the effects of SO_2. In asthmatics, an increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, is observed after acute higher exposure to SO_2. In contrast, healthy individuals do not exhibit similar acute responses, even after exposure to higher concentrations of SO_2 (USEPA 2025c).

Lead (Pb) in the atmosphere is present as a mixture of several lead compounds. Leaded gasoline and lead smelters have been the main sources of lead emitted into the air. Due to the phasing out of leaded gasoline, there was a dramatic reduction in atmospheric Pb over the past three decades. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. In adults, increased Pb levels are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death. There is no evidence to suggest that there are direct effects of Pb on the respiratory system (USEPA 2024b).

California Criteria Air Pollutants

The California Environmental Protection Agency (CalEPA) establishes statewide standards, and the California Air Resources Board (CARB) establishes local standards for the six common air pollutants identified above. In addition, CARB has established standards for the following four additional pollutants.

Visibility-reducing particles are a byproduct of various processes and activities involved in land use development. Deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality. Visibility reduction from air pollution is often due to the presence of sulfur and NO_X, as well as PM.

Sulfates ($X\text{-}SO_4^{2-}$) are chemical compounds which contain the sulfate ion (SO_4^{2-}) and are part of the mixture of solid materials that comprise PM_{10}. Most of SO_X in the atmosphere is produced by oxidation of SO_2. Oxidation of SO_2 yields sulfur trioxide, which reacts with water to form sulfuric acid, which contributes to acid deposition. The reaction of sulfuric acid with basic substances such as ammonia yields SO_4^{2-}, a component of PM_{10} and $PM_{2.5}$. Both mortality and morbidity effects have been observed with an increase in ambient SO_4^{2-} concentrations. However, studies to separate the effects of SO_4^{2-} from the effects of other pollutants have generally not been successful. Clinical studies of asthmatics exposed to sulfuric acid suggest that adolescent asthmatics are possibly a subgroup susceptible to acid aerosol exposure.

Hydrogen Sulfide (H_2S) is a colorless, flammable, poisonous compound having a characteristic rotten-egg odor. It is used as a reagent and as an intermediate in the preparation of other reduced sulfur compounds. It is also a by-product of the desulfurization processes in the oil and gas industries and rayon production, sewage treatment, and leather tanning. Geothermal power plants, petroleum production and refining, and sewer gas are specific sources of H_2S in California. High H_2S exposure has been documented as a cause of sudden death in the workplace.

Vinyl Chloride (C_2H_3Cl) is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At room temperature, vinyl chloride is a gas with a sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to its health hazards, vinyl chloride is not used in its monomer form in any end products . Vinyl chloride is a chemical intermediate, not a final product.

Vinyl chloride is an important industrial chemical primarily used to produce polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride is not only used to make PVC products, but it is also a degradation product of chlorinated industrial solvents (e.g., perchloroethylene and trichloroethene). Vinyl chloride emissions are historically associated primarily with landfills and sites contaminated with chlorinated solvents.

Toxic Air Contaminants (TACs) are generally defined as those contaminants that are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. Air toxics are also defined as an air pollutant that may increase

a person's risk of developing cancer and other serious health effects; however, the emission of a toxic chemical does not automatically create a health hazard. Air toxics include metals, other particles, gases absorbed by particles, and certain vapors from fuels and other sources. Most estimated health risks from air toxics can be attributed to relatively few compounds, the most important being PM from the exhaust of diesel-fueled engines (DPM). DPM differs from other air toxics in that it is a complex mixture of hundreds of substances rather than a single substance.

Common stationary sources of TAC emissions include gasoline stations, dry cleaners, and diesel backup generators, which are subject to local air district permit requirements. The other, often more significant, sources of TAC emissions are motor vehicles on freeways, high-volume roadways, or other areas with high numbers of diesel vehicles, such as distribution centers. Off-road mobile sources also are major contributors of TAC emissions and include construction equipment, ships, and trains.

TACs can be separated into carcinogens and non-carcinogens based on the type of effects associated with exposure to the pollutant. For regulatory purposes, carcinogens are assumed to have no safe threshold below which health impacts would not occur. Any exposure to a carcinogen poses some risk of contracting cancer. Non-carcinogens differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

Acute exposure to diesel exhaust may cause irritation to the eyes, nose, throat and lungs, and some neurological effects, such as lightheadedness. Acute exposure may also elicit a cough or nausea, as well as exacerbate asthma. Chronic exposure to DPM in experimental animal inhalation studies has shown a range of dose-dependent lung inflammation and cellular changes in the lung and immunological effects. Based upon human and laboratory studies, there is considerable evidence that DPM is a likely carcinogen. Human epidemiological studies have demonstrated an association between DPM exposure and increased lung cancer rates in occupational settings.

Other types of air pollutant emissions associated with greenhouse gas (GHG) emissions are addressed in Section 3.3, *Greenhouse Gas Emissions*.

3.1.2 Environmental Setting

Existing Air Quality Conditions

Los Angeles County spans two air basins, the South Coast Air Basin (SCAB) in the metropolitan portion of the county and the Mojave Desert Air Basin (MDAB) in the northeast desert portion of the county. While in the same county, these two air basins vary in geographies, topography, climatological patterns, and air quality.

South Coast Air Basin

The SCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. SCAB is bounded by the Pacific Ocean to the south and west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south.

SCAB is in an area of high air pollution potential due to its climate and topography. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific Ocean, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. SCAB experiences warm summers, mild winters, infrequent rainfall, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds.

Additionally, SCAB experiences frequent temperature inversions. Temperature typically decreases with height; however, under inversion conditions, temperature increases as altitude increases, thereby preventing air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog.

Light, daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to CO and NO_2 emissions. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.). In the morning, CO levels are relatively high due to cold temperatures and the large number of cars traveling. High CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO emissions are produced almost entirely from automobiles, the highest CO concentrations in SCAB are associated with heavy traffic. NO_2 concentrations are also generally higher during fall and winter days.

The annual average temperature varies little throughout the SCAB, ranging from the low to mid 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas.

Mojave Desert Air Basin

The MDAB includes the desert portion of Los Angeles County, the eastern region of Kern County, the majority of San Bernardino County, and the eastern portion of Riverside County. Major geographic features include the San Gabriel and San Bernardino Mountains, which separate the air basin from the SCAB, and the Tehachapi Mountains and the Sierra Nevada Mountains, which separate it from the San Joaquin Valley Air Basin.

The MDAB is an assemblage of mountain ranges interspersed with long broad valleys that often contain dry lakes. Many of the lower mountains in the vast terrain rise from 1,000 to 4,000 feet above the valley floor (Antelope Valley Air Quality Management District [AVAQMD] 2016). Elevations in the Antelope Valley portion of the MDAB range from 2,300 to over 8,000 feet (Department of Water Resources 2004). Prevailing winds in the MDAB are out of the west and southwest. These prevailing winds are due to the proximity of the MDAB to coastal and central regions and blockage from the Sierra Nevada Mountains to the north. Air masses pushed onshore in Southern California by differential heating are channeled through the MDAB. The MDAB is separated from the Southern California and Central Calley regions by mountains (highest elevation approximately 10,000 feet) whose passes form the main channels for these air masses. The Antelope Valley is bordered in the northwest by the Tehachapi Mountains, separated from the Sierra Nevada in the north by the Tehachapi Pass (3,800 feet above mean sea level in elevation). The Antelope Valley is bordered to the south by the San Gabriel Mountains, bisected by Soledad Canyon (3,300 feet) (AVAQMD 2016).

During the summer the MDAB is generally influenced by a Pacific Subtropical High cell that sits off the coast, inhibiting cloud formation and encouraging daytime solar heating. MDAB is rarely influenced by cold air masses moving south from Canada and Alaska, as these frontal systems are weak and diffuse by the time they reach the desert. Most desert moisture arrives from infrequent warm, moist, and unstable air masses from the south. MDAB averages between three and seven inches of precipitation per year (from 16 to 30 days with at least 0.01 inches of precipitation). The MDAB is classified as a dry-hot desert climate, with portions classified as dry-very hot desert, to indicate at least three months when maximum average temperatures over 100.4°F occur (AVAQMD 2016). Most of the Antelope Valley is classified high desert, although small portions extend into the San Gabriel Mountains. Antelope Valley is characterized by low annual precipitation, typically totaling less than 10 inches per year; precipitation is infrequent and often occurs as brief, intense storms (Lear 2023). The wettest month of the year is March, with an average of 3.54 inches of rainfall, and the driest months are July and August, with an average of 0.04 inches of rainfall (Weather Atlas 2024). In Antelope Valley, the summer daily maximum temperatures average approximately 94.1°F, and the winter daily maximum temperatures average approximately 54.1°F (Weather Atlas 2024).

Regional Attainment Status

The federal and state environmental protection agencies assign an attainment designation for each criteria pollutant. The attainment designation identifies if the regional criteria air pollutant concentrations meet the health-based standards defined in the NAAQS and CAAQS. If the air quality in a geographic area meets or is cleaner than the national standard, it is called an attainment area (designated unclassifiable/attainment); areas that do not meet the national standard are called nonattainment areas. In some cases, the USEPA is not able to determine an area's status after evaluating the available information. Those areas

are designated unclassifiable. Table 3.1-3 and Table 3.1-4 reflect the federal and state attainment statuses provided by the South Coast Air Quality Management District (SCAQMD) and the AVAQMD, respectively.

Table 3.1-3. Federal and State Attainment Status for SCAQMD

Pollutant	Federal Attainment Status	State Attainment Status
Ozone (O_3)	Nonattainment (Extreme – 1-Hour and 8-Hour)	Nonattainment
Respirable Particulate Matter (PM_{10})	Attainment (Maintenance – 24-Hour)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment (Serious – 24-hour, Annual)	Nonattainment
Carbon Monoxide (CO)	Attainment (Maintenance – 1-Hour and 8-Hour)	Attainment
Nitrogen Dioxide (NO_2)	Attainment (Maintenance – Annual; Unclassifiable – 1-Hour)	Attainment
Sulfur Dioxide (SO_2)	Attainment (Unclassified – 1-Hour, 24-Hour)	Attainment
Lead (Pb)	Nonattainment (Partial – 3-Months Rolling)	Attainment
Visibility-Reducing Particles	N/A	Attainment
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride	N/A	N/A

Source: SCAQMD 2022.

Table 3.1-4. Federal and State Attainment Status for AVAQMD

Pollutant	Federal Attainment Status	State Attainment Status
Ozone (O_3)	Nonattainment (8-hour)	Nonattainment
Respirable Particulate Matter (PM_{10})	Attainment (Unclassified – 24-Hour)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Attainment (Unclassified)	Unclassified (Annual)
Carbon Monoxide (CO)	Attainment (Unclassified)	Attainment (1-Hour, 8-Hour)
Nitrogen Dioxide (NO_2)	Attainment (Unclassified)	Attainment (1-Hour, Annual)
Sulfur Dioxide (SO_2)	Attainment (Unclassified)	Attainment (1-Hour, 24-Hour)
Lead (Pb)	Attainment (Unclassified – Calendar Quarter, Rolling 3-Month Average)	Attainment (30-Day Average)

Pollutant	Federal Attainment Status	State Attainment Status
Visibility-Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride	N/A	Unclassified

Source: AVAQMD 2017.

Local Air Quality

Los Angeles County has 28 active monitoring stations to measure ambient pollutant concentrations (SCAQMD 2025). Each station was sited to meet monitoring objectives that call for stations that monitor the highest pollutant concentrations, representative concentrations in areas of high population density, the impact of major pollution emissions sources, and general background concentration levels. Table 3.1-5 summarizes the number of days (in the years 2020-2023) the NAAQS and the CAAQS were exceeded, and the maximum pollutant levels during such exceedance for SCAB as reported by the SCAQMD.

Table 3.1-5. Ambient Air Quality Monitoring Summary for South Coast Air Basin

Pollutant / Standard	Number of Days Thresholds Were Exceeded and Maximum Levels during Such Exceedances			
	2020	2021	2022	2023
Carbon Monoxide (CO)				
Max 1-Hour Concentration (ppm)	4.5	4.3	3.4	3.2
Max 8-Hour Concentration (ppm)	3.1	3.7	3.0	2.6
Ozone (O_3)				
State 1-Hour ≥ 0.09 ppm	104	91	88	76
State 8-Hour ≥ 0.07 ppm	145	133	126	115
Federal 8-Hour ≥ 0.07 ppm	141	130	123	115
Max 1-Hour Concentration (ppm)	0.185	0.148	0.155	0.155
Max 8-Hour Concentration (ppm)	0.140	0.120	0.122	0.118
Nitrogen Dioxide (NO_2)				
Max 1-Hour Concentration (ppb)	101.6	91.5	95	88.2
Sulfur Dioxide (SO_2)				
Max 1-Hour Concentration (ppb)	6.0	7.7	6.7	23.2
Suspended Particulates (PM_{10})				
Federal 24-Hour ≥ 150 µg/m^3	0	0	1	1

Pollutant / Standard	Number of Days Thresholds Were Exceeded and Maximum Levels during Such Exceedances			
	2020	2021	2022	2023
State 24-Hour ≥ 50 µg/m^3	173	179	168	158
Max 24-Hour Concentration (µg/m^3)	124	132	177	186
Fine Particulates ($PM_{2.5}$)				
Federal 24-Hour ≥ 35 µg/m^3	13	20	9	4
Max 24-Hour Concentration (µg/m^3)	53.1	102.1	53.8	53.8
Lead (Pb)				
Max Monthly Average Concentration (µg/m^3)	0.016	0.013	0.010	0.012
Max 3-Month Rolling Average Concentration (µg/m^3)	0.011	0.012	0.008	0.008
Sulfate				
Max 24-Hour Concentration (µg/m^3)	5.2	4.8	9.6	26.8

Sources: SCAQMD 2020-2023.
Notes: µg/m^3 = micrograms per cubic meter; $PM_{2.5}$ = inhalable particles with diameters that are generally 2.5 micrometers and smaller; ppb = parts per billion; ppm = parts per million.

Table 3.1-6 summarizes the number of days (in the years 2020-2023) the NAAQS and the CAAQS were exceeded, and the maximum pollutant levels during such exceedance for the MDAB. CARB collected the majority of this data from its Lancaster monitoring site, located in Los Angeles County. This station collects information 24 hours a day, seven days a week on the ambient levels of pollutants, including O_3, PM_{10}, $PM_{2.5}$, NO_2, SO_2, and CO. This site was chosen because it is within the jurisdiction of the AVAQMD and, therefore, reports representative data for the AVAQMD (AVAQMD 2016).

Table 3.1-6. Ambient Air Quality Monitoring Summary for Mojave Desert Air Basin

Pollutant / Standard	Number of Days Thresholds Were Exceeded and Maximum Levels during Such Exceedances			
	2020	2021	2022	2023
Carbon Monoxide (CO)				
Max 1-Hour Concentration (ppm)	1.67	1.46	1.380	--
Max 24-Hour Concentration (ppm)	0.707	0.745	0.632	--
Ozone				
State 1-Hour ≥ 0.09 ppm	45	43	38	33
State 8-Hour ≥ 0.07 ppm	141	146	129	121

Pollutant / Standard	Number of Days Thresholds Were Exceeded and Maximum Levels during Such Exceedances			
	2020	2021	2022	2023
Federal 8-Hour ≥ 0.07 ppm	8	3	33	--
Max 1-Hour Concentration (ppm)	0.099	0.086	0.98	--
Max 8-Hour Concentration (ppm)	0.083	0.079	0.082	--
Nitrogen Dioxide (NO_2)				
State 1-Hour ≥ 0.18 ppm	0	0	0	0
Max 1-Hour Concentration (ppm)	0.052	0.046	0.044	0.035
Suspended Particulates (PM_{10})				
Federal 24-Hour ≥ 150 µg/m^3	1	1	0	--
State 24-Hour ≥ 50 µg/m^3	42	21	9	--
Max 24-Hour Concentration (µg/m^3)	192.3	411.2	76.3	105.2
Fine Particulates ($PM_{2.5}$)				
Federal 24-Hour ≥ 35 µg/m^3	24	14	0	0
Max 24-Hour Concentration (µg/m^3)	74.8	35.8	15.2	12.5

Sources: CARB 2020-2023.
Notes: µg/m^3 = micrograms per cubic meter; $PM_{2.5}$ = inhalable particles with diameters that are generally 2.5 micrometers and smaller; ppb = parts per billion; ppm = parts per million.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB identified the following groups who are most likely to experience adverse health effects due to exposure to air pollution: children less than 14 years of age; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory disease (CARB n.d.). According to the SCAQMD, land uses that constitute sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. SCAQMD guidance for assessed localized air quality impacts requires the identification of sensitive receptors within 500 meters (1,640 feet) of emission sources (SCAQMD 2025).

3.1.3 Regulatory Setting

Federal, state, and local laws and regulations have been enacted to address concentrations of air pollutants and other metrics of air quality conditions. Provisions of the federal Clean Air Act (CAA) govern air quality in the U.S. and regulate emission sources. In addition to being subject to the requirements of the CAA, air quality management in California is also

administered by more stringent regulations under the California Clean Air Act (CCAA). At the federal level, the USEPA administers the CAA, and in California the CARB at the state level, air quality management districts at the regional level, and air pollution control districts at local levels, administer the CCAA.

Federal Regulations

Federal Clean Air Act

The CAA governs air quality at the national level and the USEPA is responsible for enforcing the regulations provided in the CAA. Under the CAA, the USEPA is authorized to establish NAAQS that set protective limits on concentrations of air pollutants in ambient air. Enforcement of the NAAQS is required under the 1977 CAA and subsequent amendments. As required by the CAA, NAAQS have been established for the seven criteria air pollutants: O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, and Pb. These pollutants are common byproducts of human activities and have been documented through scientific research to cause adverse health effects. The CAA grants the USEPA authority to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS concentrations have been met on a regional scale relying upon air monitoring data from the most recent three-year period.

As part of its enforcement responsibilities, the USEPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the State Implementation Plan.

In addition to the criteria pollutants, the air toxics provisions of the CAA require the USEPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112 of the CAA, the USEPA establishes National Emission Standards for Hazardous Air Pollutants. The list of Hazardous Air Pollutants or air toxics includes specific compounds that are known or suspected to cause cancer or other serious health effects.

State Regulations

California Clean Air Act

The CCAA was enacted in 1988 (California Health & Safety Code Section 39000 et seq.). California also has ambient air quality standards (i.e., CAAQS), which predate USEPA's formation in 1970 and the original NAAQS for pollutants considered harmful to public health and the environment, including the six criteria pollutants, as well as sulfates, hydrogen sulfide, vinyl chloride (chloroethene), and visibility reducing particles. The CAAQS currently in effect for each pollutant, as well as the attainment status of the SCAB, are shown in Table 3.1-3. In 1959, California enacted legislation requiring the California Department of

Public Health to establish air quality standards and necessary controls for motor vehicle emissions. The CCAA requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date. California law mandates CAAQS which includes more stringent standards than the NAAQS; however, attainment of the NAAQS has precedence over attainment of the CAAQS.

California Air Resources Board

CARB ensures the implementation of the CCAA and responds to the federal CAA. CARB is also responsible for the control of vehicle emission sources, while the local air district is responsible for enforcing standards and regulating stationary sources. Under the CCAA, regional jurisdictions of the state are required to develop plans to achieve and maintain the CAAQS by the earliest feasible date, which is determined in the most recent SIP based on existing emissions and reasonably foreseeable control measures that will be implemented in the future. This is administered by CARB at the state level, and by the air quality management districts at the regional and local levels. California is divided into 35 regions with local air quality agencies that determine the degree of reductions needed to lower concentrations of pollutants under the applicable air quality standards and improve protection for public health.

Toxic Air Contaminants

CARB also controls emissions of TACs throughout the state. Particulate exhaust emissions (i.e., DPM) were identified as a TAC by CARB in 1998. State efforts to reduce DPM emissions have focused on the use of improved fuels, adding particulate filters to engines, and requiring the production of new technology engines that emit fewer exhaust particulates. TACs in California are regulated primarily through the Tanner Air Toxics Act (Chapter 1047, Statutes of 1983) and the Air Toxics "Hot Spots" Information and Assessment Act (Chapter 1252, Statutes of 1987). Assembly Bill (AB) 1807 sets forth a formal procedure for CARB to designate substances as TACs. Research, public participation, and scientific peer review must occur before CARB can designate a substance as a TAC. The Air Toxics Hot Spots Information and Assessment Act requires that TAC emissions from stationary sources be quantified and compiled into an inventory according to criteria and guidelines developed by CARB. Under Airborne Toxic Control Measure 2485, all diesel-fueled commercial trucks are subject to a strict limit on idling of no more than five minutes at any location within 100 feet of sensitive receptors.

CARB Gasoline Vehicle Emissions Adjustment Factors

CARB developed the mobile source emissions model Emission Factor (EMFAC) 2017 as the preferred tool for estimating air pollutant emissions from on-road vehicle travel for land use development and transportation projects in California. The September 2019 federal revocation of the statewide authority to set GHG emissions standards and set zero emission vehicle (ZEV) mandates compromised the validity of emission factors contained within the EMFAC2017 model, as fewer ZEVs may be sold in future years thereby indirectly increasing

emissions from gasoline-fueled vehicles. To account for the potential reduction in market share of ZEVs in future years, CARB published *EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicle Rule Part One* that was approved by the USEPA in March 2020 (CARB 2020). CARB guidance includes multipliers for EMFAC2017 output rates that apply to emissions of NO_X, total organic gases and reactive organic gases (ROGs) / VOCs, particulate matter (PM_{10} and $PM_{2.5}$), and CO from gasoline fueled light and medium duty vehicles.

California Code of Regulations – Asbestos and Lead

The California Code of Regulations (CCR) regulates potential asbestos exposure in construction when construction, alteration, repair, maintenance, renovation or demolition of structures, substrates, or portions thereof contain asbestos (8 CCR §1529 [a][1][C]). Additionally, in California, materials containing greater than one-tenth of one percent (>0.1%) asbestos by weight are regulated as asbestos-containing material.

The CCR Title 17, Division 1, and Chapter 8 pertain to all public and residential buildings in California. Pursuant to these and USEPA regulations, lead-based paint (LBP) is defined as paint or other surface coatings containing an amount of lead equal to or greater than one milligram per square centimeter (1.0 mg/cm^2) or more than half of one percent (>0.5% or 5,000 ppm) by weight. The CCR also defines lead hazards as deteriorated LBP, disturbance of LBP or presumed LBP without containment, or any other nuisances which may result in persistent or quantifiable lead exposure. Additionally, CCR, Title 8, §1532.1(a) regulates worker exposure to materials containing lead during construction work. These regulations require worker protection during construction "where lead or materials containing lead are present."

California Building Code

CCR, Title 24, known as the California Building Code (CBC), sets forth the regulations for building construction and system design and installation to achieve energy efficiency and preserve outdoor and indoor environmental quality. The CBC includes the following subparts which are most applicable to development under the proposed Project.

CCR, Title 24, Part 6 comprises the California Energy Code, which was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to increase the baseline energy efficiency requirements. The Title 24 standards were updated in 2021 and became effective on January 1, 2023. The updated standards apply to all buildings for which an applicable building permit is submitted on or after January 1, 2023, and established new standards for electric-ready requirements, expanded solar photovoltaic (PV) and battery storage, and strengthened ventilation standards for improved air quality. The Title 24 standards also include efficiency improvements to the residential standards for attics, walls, water heating, and lighting; and efficiency improvements to the non-residential standards are in alignment with the American Society of Heating and Air-Conditioning Engineers 90.1-2013 National Standards.

Although it was not originally intended to reduce criteria pollutant or TAC emissions, electricity production by fossil fuels results in ozone precursor emissions and energy-efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased criteria pollutant and TAC emissions from residential and non-residential buildings.

CCR, Title 24, Part 11 comprises CALGreen, which establishes mandatory green building code requirements as well as voluntary measures (Tier 1 and Tier 2) for new buildings in California. The mandatory provisions in CALGreen will reduce the use of VOC-emitting materials, strengthen water efficiency conservation, increase construction waste recycling, and increase energy efficiency. Tier 1 and Tier 2 are intended to further encourage building practices that minimize the building's impact on the environment and promote a more sustainable design.

Regional and Local Regulations

South Coast Air Quality Management District

The SCAQMD has jurisdiction over a total area of 10,743 square miles, consisting of SCAB – which comprises 6,745 square miles, including Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties – and the Riverside County portion of the Salton Sea Air Basin and MDAB.

The SCAQMD is tasked with preparing regional programs and policies designed to improve air quality within the SCAB, which are assessed and published in the form of the AQMP. The AQMP is updated every four years to evaluate the effectiveness of the adopted programs and policies and to forecast attainment dates for nonattainment pollutants to support the SIP based on measured regional air quality and anticipated implementation of new technologies and emissions reductions. The most recent publication is the 2022 AQMP.

The 2022 AQMP is the regional plan for improving air quality and meeting federal standards for air pollutants. Through a series of strategies, the AQMP outlines the needed actions to reduce air pollution emissions and attain the 2015 8-hour ozone standard of 70 parts per billion (ppb) by 2037.

The 2022 AQMP control strategy includes a variety of implementation approaches such as regulation, accelerated deployment of available cleaner technologies, best management practices, co-benefits from existing programs (e.g., climate, energy efficiency), incentives, and "black box measures" from the CAA (Section 182[e][5]). "Black box" measures reflect the reliance on emissions reduction from developing advanced technologies that are not yet known. The rationale for allowing "black box" measures is that "extreme" ozone nonattainment areas have 20 years to attain the standard and, in that time, advanced technologies to achieve further emission reductions are presumed to become available.

The plan recognizes that the most significant challenge to achieve attainment is the reduction of NO_x emissions. To meet the 2015 O_3 standard, NO_x emissions must be reduced by 124 tons per day, or about 83 percent below current levels. Traditional combustion

controls and after controls will not be sufficient to achieve the level of NO_x emissions reduction needed for attainment. Instead, it requires a widespread adoption of zero emissions technologies where feasible, and the lowest emitting technologies where zero emission technologies are not feasible, across all emission sectors. Close collaboration with federal, state, and regional governments, businesses, and the public will be critical to tackling this challenge. Meeting the standard also will require federal government action to address sources that are subject to federal regulation and beyond the regulatory authority of the SCAQMD and CARB.

In 2012, the SCAQMD adopted the Attainment Plan for the 2012 Annual $PM_{2.5}$ Standard which established a goal to transition the South Coast Air Basin, a "'serious" nonattainment area for the 2012 $PM_{2.5}$ standard, into attainment by December 31, 2025. In March of 2023, SCAQMD withdrew their previous plan addressing the standard to avoid potential disapproval of the plan by the USEPA. SCAQMD subsequently developed a new plan that requested a 5-year extension to demonstrate attainment of the standard (by December 31, 2030). The $PM_{2.5}$ Plan was adopted on June 7, 2024. The new plan requires accelerated implementation of control measures from the 2022 AQMP as well as limited additional measures to reduce ammonia and direct $PM_{2.5}$ emissions in order to meet the 2030 target (SCAQMD 2024).

The SCAQMD also has established various rules to manage and improve air quality in the SCAB. Proponents of projects located within SCAQMD's jurisdictional area shall comply with all applicable SCAQMD Rules and Regulations pertaining to air quality, including but not limited to:

- Rule 401 (Visible Emissions) prohibits discharges of any pollutant into the atmosphere from any single source of emissions that is as dark or darker in shade as that designated No. 1 on the Ringelmann chart (opacity equal to or greater than 20 percent) for up to or more than three minutes in any one hour.
- Rule 402 (Nuisance) states that a person should not emit air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- Rule 1113 (Architectural Coatings) establishes limits on the VOC content of specific architectural coating applications. Non-residential building envelope coatings are required to have VOC content of less than 50 grams per liter.
- Regulation XIII (New Source Review) authorizes the SCAQMD to deny any Permit to Construct for any new or modified source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia, unless Best Available Control Technology is employed (Rule 1303) and it can be demonstrated through emissions modeling that the source would not cause or contribute to air quality violations.

Antelope Valley Air Quality Management District

The AVAQMD serves the MDAB within Los Angeles County. Covering about 1,300 square miles, the AVAQMD manages air quality for nearly two dozen unincorporated communities in the County's 5th Supervisorial District and the municipalities of Palmdale and Lancaster. The AVAQMD operates monitoring stations in the Antelope Valley, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections.

The AVAQMD is part of the Western Mojave Desert nonattainment area that was designated as nonattainment by the USEPA in October 2015. In response to its "severe" nonattainment status the AVAQMD had issued ozone attainment plans. The most updated plan – AVAQMD Federal 70 ppb Ozone Attainment Plan – published in January 2023: (1) demonstrates that the AVAQMD will meet the primary required federal O_3 planning milestone, attainment of the 70 ppb 8-hour ozone NAAQS, by August 2033; (2) presents the progress the AVAQMD will make towards meeting all required ozone planning milestones; and (3) discusses the 2015 70 ppb 8-hour ozone NAAQS, preparatory to an expected non-attainment designation for the new NAAQS.

The AVAQMD has established various rules to manage and improve air quality within its jurisdictional area of the MDAB. AVAQMD's rules mimic those outlined by SCAQMD including Rule 401, Rule 402, Rule 1113, and Regulation XIII. Proponents of projects located within AVAQMD's jurisdictional area shall comply with all applicable AVAQMD Rules and Regulations pertaining to air quality.

Los Angeles County 2035 General Plan

Adopted in 2015, the Los Angeles County 2035 General Plan guides the long-term physical development and conservation of unincorporated areas through a framework of goals, policies, and implementation programs. It also serves as an advisory document to coordinate land use planning, public service and facilities planning, circulation and transportation planning, and environmental management initiatives. Through a series of principles, goals, and policies, the General Plan guides the county towards healthy, livable, and sustainable communities. The Air Quality Element of the General Plan includes goals and policies related to reducing air quality impacts, including the following which are relevant to the proposed Project:

- Policy AQ 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.
- Policy AQ 1.2: Encourage the use of low or no VOC emitting materials.
- Policy AQ 1.3: Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.
- Policy AQ 2.1: Encourage the application of design and other appropriate measures when siting sensitive uses, such as residences, schools, senior centers, daycare centers,

medical facilities, or parks with active recreational facilities within proximity to major sources of air pollution, such as freeways.

3.1.4 Impact Assessment Methodology

Significance Thresholds

Consistent with Appendix G of the California Environmental Quality Act (CEQA) Guidelines and County practice, the proposed Project would have a potentially significant effect on air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plans;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations; and/or
- Create objectionable odors affecting a substantial number of people.

For local thresholds of significance, the SCAQMD published its CEQA Air Quality Handbook (published in 1993) to guide air quality assessments for CEQA projects within its jurisdiction, and supplemental updates have been published to the agency website as air quality impacts assessment procedures evolved over time (SCAQMD 1993). To assist in the impact assessment of air pollutant emissions, the SCAQMD published Air Quality Significance Thresholds to establish mass daily threshold screening values for air pollutant emissions from CEQA projects within the SCAB (SCAQMD 2023) (see Table 3.1-7). The mass daily thresholds were derived using regional emissions modeling techniques to prevent the occurrence of air quality violations that would obstruct implementation of the regional AQMP and hinder efforts to improve regional air quality. The air quality significance thresholds were updated in March 2023 to reflect the USEPA's redesignation of the Coachella Valley from Severe-15 to Extreme nonattainment for the 2008 O_3 NAAQS (SCAQMD 2023).

Table 3.1-7. SCAQMD Significance Thresholds

Criteria Pollutant	Construction Emissions Thresholds (lbs/day)	Operational Emissions Thresholds (lbs/day)
Nitrogen Oxides (NO_x)	100	55
Volatile Organic Compounds (VOC)	75	55
Particulate Matter (PM_{10})	150	150
Particulate Matter ($PM_{2.5}$)	55	55
Sulfur Oxides (SO_x)	150	150

Criteria Pollutant	Construction Emissions Thresholds (lbs/day)	Operational Emissions Thresholds (lbs/day)
Carbon Monoxide (CO)	550	550
Lead (Pb)	3	3

Source: SCAQMD 2023.

Similarly, the AVAQMD published CEQA and Federal Conformity Guidelines (2016) that established thresholds of significance that are similar to, but more specific than, the CEQA Guidelines (Appendix G) thresholds stated above. The AVAQMD's CEQA and Federal Conformity Guidelines state that a project may have a significant impact regarding air quality if it:

- Generates total emissions (direct and indirect) in excess of the thresholds given in Table 3.1-8 (below);
- Generates a violation of any ambient air quality standard when added to the local background;
- Does not conform with the applicable attainment or maintenance plan(s); and/or
- Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (non-cancerous) greater than or equal to 1.

The AVAQMD numerical thresholds of significance are given as a daily value and an annual value, so that a multi-phased project (such as a project with a construction phase and a separate operational phase) with phases shorter than one year can be compared to the daily value. The AVAQMD's CEQA and Federal Conformity Guidelines state that upon request, the AVAQMD will clarify which threshold is most appropriate to use for a given project.

Table 3.1-8. AVAQMD Significance Thresholds

Criteria Pollutant	Annual Threshold (tons per year [tpy])	Daily Threshold (pounds per day [lbs/day])
Carbon Monoxide (CO)	100	548
Nitrogen Oxides (NO_x)	25	137
Volatile Organic Compounds (VOC)	25	137
Sulfur Oxides (SO_x)	25	137
Particulate Matter (PM_{10})	15	82
Particulate Matter ($PM_{2.5}$)	12	65
Hydrogen Sulfide (H_2S)	10	54
Lead (Pb)	0.6	3

Source: AVAQMD 2016.

Methodology

As described in Chapter 2, *Project Description,* the proposed Project consists of the adoption of amendments to the Los Angeles County Code (LACC) to establish commercial cannabis activities as an allowable use within certain eligible zoning districts in the unincorporated county. The proposed Project would not generate direct impacts associated with air emissions as the proposed Project is not a development project. Rather, the proposed Project would enable new uses within eligible zoning districts, the operation of which could produce new criteria pollutant emissions.

Certain reasonable assumptions can be made about the level of future commercial cannabis activities (e.g., new uses and minor physical alterations) that would result from the proposed Project. Commercial cannabis businesses, for example, would be limited to existing structures, would be subject to numerous licensing and operational requirements, and would be required to comply with applicable policies and regulations of the County General Plan and LACC to be eligible for ministerial permit processing under the County's existing site plan review procedures.

For the purposes of presenting an analysis of potential criteria pollutant emissions from future cannabis operations enabled under the proposed Project against adopted thresholds from the SCAQMD and AVAQMD, quantitative methods, including data from the California Energy Commission and the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.29, were utilized to establish small-scale, independent emissions scenarios for each allowable cannabis business type, excluding distribution and microbusiness operations.[1, 2] Despite the development standards found in the proposed commercial cannabis regulations, further detailed in Chapter 2, *Project Description*, that would limit certain commercial cannabis activities, it cannot be determined with certainty the specific locations, sizes, and amount of new physical development and operational levels that would result from commercial cannabis activities that would be permissible under the proposed Project. Consequently, detailed modeling of air emissions resulting from the overall operation of all future commercial cannabis activities resulting from the proposed Project would be infeasible and speculative.

[1] Cannabis distribution includes the procurement, sale, and transport of cannabis and cannabis products between licensed businesses. Distribution in this context emulates the same emissions scenario as retail operations and, therefore, was not independently analyzed.

[2] As described in Chapter 2, *Project Description*, microbusinesses consist of at least three small-scale cannabis business types, and there is no limit to the number of cannabis microbusiness licenses that would be allowed within unincorporated areas of the county. However, each use included in a microbusiness would count toward the use's respective cap on licenses in the applicable unincorporated area. Because of this, there is no way to accurately predict which business types would make up each microbusiness or how many microbusiness licenses would be approved. Therefore, creating a hypothetical scenario for the purpose of estimating GHG emissions using CalEEMod would be overly speculative. Instead, a conservative estimate can be identified by adding together the emissions estimates from the three highest emitting cannabis business types, using CalEEMod.

Presented below is the detailed methodology for the analysis of air quality impacts. As described above and in Chapter 3, *Environmental Impact Analysis*, the following analysis utilizes a programmatic approach to evaluate the air quality impacts associated with the proposed Project and emphasizes the thresholds involving compliance with the rules and regulations of the SCAQMD and AVAQMD. The impact assessment also considers emissions on a cumulative scale and the potential for public nuisances related to cannabis odors.

Conflicts with Applicable Air Quality Plans

Air quality violations occur when facilities are out of compliance with applicable SCAQMD and AVAQMD rule requirements, permit conditions or legal requirements, or with applicable federal or state air pollution regulations. The applicable air quality plans within Los Angeles County are SCAQMD's 2022 AQMP and AVAQMD's Federal 70 ppb Ozone Attainment Plan. Both applicable air quality plans are, in part, based on underlying growth projections within the Southern California Association of Governments (SCAG) 2024-2050 Connect SoCal Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Consistency with SCAQMD and AVAQMD's air quality plans is also assessed by determining potential effects of permanent facility operations on population, housing, and employment assumptions utilized in the development of the air quality plan, and by extension the RTP/SCS. If implementation of the proposed Project would render the assumptions invalid, a significant air quality impact may occur.

Cumulatively Considerable Net Increase in Criteria Pollutants

CEQA Guidelines Section 15130 requires that an Environmental Impact Report (EIR) discuss cumulative impacts of a project when the project's incremental effects are cumulatively considerable. A "cumulative impact" is an impact that is created as a result of the combination of the proposed project together with other projects causing related impacts. "Cumulatively considerable" means that the incremental effects of the individual project are significant when viewed in connection with the effects of past projects, current projects, and probable future projects, which in this case includes growth within the county.

This analysis focuses on the air quality impacts that could occur from criteria air pollutant emissions associated with the implementation of the proposed Project. Consistent with County, SCAQMD, and AVAQMD guidance, this analysis evaluates the contribution of the proposed Project to cumulative air quality impacts by comparing the estimated emissions against the SCAQMD and AVAQMD's thresholds of significance defined above. As discussed below, the proposed Project would generate negligible construction related emissions from the limited amount of new development (e.g., interior remodels, installation of signage, new lighting, and building façade treatments) that would result from the proposed Project. Proposed regulations would limit licensed cannabis operations to existing structures, and the proposed Project does not propose any changes in the land use or zoning of any properties that would elicit additional new development or redevelopment. However,

operational emissions, such as employee or customer vehicle trips, cultivation practices, or equipment usage, would result from future commercial cannabis activities.

As mentioned above, emissions that would be generated under the implementation of the proposed Project were estimated for cannabis cultivation, manufacturing, testing, and retail operations using CalEEMod. The results of the CalEEMod analysis are discussed below and are presented in Appendix D.

Construction Air Quality Impacts

As stated above, the proposed Project would not generate short-term construction impacts associated with air emissions as the proposed Project would not permit the development of new buildings or the redevelopment of existing buildings to accommodate a proposed cannabis business. Rather, the proposed Project would enable new uses within eligible zoning districts and allow for commercial cannabis businesses to be established in only previously existing structures. Any development or redevelopment associated with a potential cannabis business, or upgrades to comply with the LACC, would be required to comply with the Chapter 8, *Air Quality Element*, of the General Plan and all applicable LACC regulations. Applicable policies that commercial cannabis businesses would be subject to can be found in Section 3.1.3, *Regulatory Setting*, under *Los Angeles County 2035 General Plan*. All separate licenses, approvals, and/or policy consistency analyses would be required before cannabis business licenses could be issued. Moreover, any air pollutant emissions resulting from short-term construction activities required for minor renovations and site improvements would be spread throughout the Project area and result in a negligible percentage of county-wide emissions. As such, construction-related air quality impacts are considered *less than significant* and do not require further analysis in this Program EIR.

Operational Air Quality Impacts

Air pollutant emissions generated by the long-term operation of various commercial cannabis activities were estimated on an independent scale using CalEEMod. Operational emissions were not estimated for distribution and microbusiness operations.[3] Depending on the type of development project being simulated, CalEEMod will include standardized default data for each land use and sub-land use category. Emissions for each allowed cannabis business type were calculated based on the most likely worst-case and unmitigated scenario. Because no development is proposed as a part of the proposed Project, CalEEMod scenarios only analyzed operational emissions for each business type using default values, as well as some factors and assumptions deemed typical for legal cannabis operations of similar scale to those allowed under the proposed Project.

CalEEMod requires locations to be chosen for each emissions scenario. For the purposes of each scenario, the operation or facility location was chosen based on parcel eligibility (e.g.,

[3] See Footnotes 1 and 2, above.

within unincorporated areas, developed, eligible zoning boundary). Each CalEEMod simulation calculated emissions for a single operation or premises and did not account for aspects of the chosen surrounding parcel's existing landscape features. Given the programmatic nature of the proposed Project, the estimated emissions are provided to serve as an illustrative example of typical emissions that could occur as a result of licensing of commercial cannabis activities in the county.

Table 3.1-9. Operational Emissions Estimates for Allowed Cannabis Business Types

Cannabis Business Type Model (Single Operation/Facility)	Daily Unmitigated Operational Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Testing	0.07	0.04	0.42	<0.01	0.08	0.02
Manufacturing	0.05	0.03	0.27	<0.01	0.05	0.01
Retail	0.29	0.12	1.39	<0.01	0.26	0.07
Cultivation	0.86	0.08	1.92	<0.01	0.20	0.05
Annual Total	2.13	0.27	4.00	<0.01	0.59	0.15

Table 3.1-10. Projected Operational Emissions Compared to Thresholds

Pollutant	SCAQMD Daily Emissions Thresholds (Operation) (lbs/day)	AVAQMD Daily Emissions Threshold (lbs/day)	Project Emissions (lbs/day)
NO_X	55	137	0.27
VOC	55	137	2.13
PM_{10}	150	82	0.59
$PM_{2.5}$	55	65	0.15
SO_2	150	137	<0.01
CO	550	548	4.00

Impacts on Sensitive Receptors

Health Risks from Criteria Air Pollutants

In December 2018, the California Supreme Court held that the EIR for the Friant Ranch Project – a 942-acre master-planned, mixed use development with over 2,500 senior dwelling units, 250,000 square feet (sf) of commercial space, and extensive open space/recreational amenities on former agricultural land in north central Fresno County – was deficient in its informational discussion of air quality impacts as they relate to adverse human health effects.

As noted in the *Brief of Amicus Curiae* prepared by the SCAQMD in the Friant Ranch case (April 6, 2015), SCAQMD concluded that currently available regional modeling tools are not well suited to analyze relatively small changes in criteria pollutant concentrations

associated with individual projects. Regional modeling tools developed by air districts throughout the state are generally designed to be used at the federal, state, regional, and/or local levels and are not well-equipped to analyze whether and to what extent the criteria pollutant emissions of an individual project directly impact human health in a particular area. Even where a Health Risk Assessment (HRA) can be prepared, however, the resulting maximum health risk value is only a calculation of risk – it does not necessarily mean anyone will contract cancer or non-cancer health risks as a result of the project. Though the *Brief of Amicus Curiae* was prepared by the SCAQMD, the SCAQMD maintains some of the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the state.

For local plans or projects that exceed any identified numerical threshold adopted by local agencies or air districts, EIRs typically identify and disclose generalized health effects of certain air pollutants, but are currently unable to establish a reliable connection between any local plan or an individual project and a particular health effect. In addition, no relevant agency has approved a quantitative method to reliably and meaningfully do so. Several factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning, technological limitations for modeling at a local plan or project level, and the intrinsically complex nature of the relationship between air pollutants and health effects in conjunction with local environmental variables. As such, this Program EIR does not provide a detailed analysis linking the significant air quality impacts associated with the proposed Project with a specific health effect, and impacts are considered *less than significant* and do not require further analysis in this Program EIR.

Toxic Air Contaminants

The CARB indicates that one of the highest public health priorities is the reduction of DPM generated by vehicles on California's freeways and highways, as it is one of the primary TACs with the most direct and common implications for respiratory health problems. Per CARB criteria, heavily traveled roadways where annual average daily trips (AADT) exceed 100,000 can be sources of particulate emissions from diesel-fueled engines.

The CARB has made recommendations on considering existing sensitive uses when siting new TAC-emitting facilities and likewise, considering TAC-emitting sources when siting sensitive receptors. The CARB and SCAQMD recommend the following buffer distances to be observed when locating these types of TAC emitters or sensitive land uses:

- Freeways or major roadways – 500 feet
- Dry cleaners – 500 feet
- Auto body repair services – 500 feet
- Gasoline dispensing stations with an annual throughput of less than 3.6 million gallons – 50 feet; gasoline dispensing stations with an annual throughput at or above 3.6 million gallons – 300 feet

The AVAQMD also recommends that the following project types for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated under AVAQMD significance threshold criteria number 4:

- Any industrial project – 1,000 feet
- Distribution center (40 or more trucks per day) – 1,000 feet
- Major transportation project (50,000 or more vehicles per day) – 1,000 feet
- Dry cleaner using perchloroethylene – 500 feet
- Gasoline dispensing facility – 300 feet

The SCAQMD and AVAQMD recommend that site-specific HRAs be performed to document potential cancer risk when siting sensitive land uses within the above buffer zones.

Mobile-source CO Modeling

Localized air quality impacts and respiratory health risks could occur as a result of CO hotspots. Areas with high vehicle volumes, such as congested intersections (i.e., Level of Service [LOS] E or worse), have the potential to create high concentrations of CO, known as CO hot spots. With respect to the formation of CO hotspots, a project's localized air quality impact is considered significant if CO emissions create a hotspot where either the California 1-hour standard of 20 ppm or the federal and state 8-hour standard of 9.0 ppm is exceeded. In general, this only occurs at severely congested intersections (i.e., LOS E or worse).

SCAQMD conducted CO modeling for the attainment demonstration in the Federal Attainment Plan for Carbon Monoxide (*CO Plan* for the SCAQMD's 2003 *Air Quality Management Plan*). SCAQMD modeled the four most congested intersections in the Basin, including: (1) Wilshire Boulevard and Veteran Avenue; (2) Sunset Boulevard and Highland Avenue; (3) La Cienega Boulevard and Century Boulevard; and (4) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day (SCAQMD 2003). This intersection is located near the on- and off-ramps to Interstate (I-) 405 in West Los Angeles. Based on this study, the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (maximum 1-hour concentration) and 3.2 (maximum 8-hour concentration) at Wilshire Boulevard and Veteran Avenue, exclusive of ambient background CO concentrations, which is well below the federal and state CO standards. This indicates that even these highly congested intersections would not cause a CO hotspot to form.

3.1.5 Environmental Impacts Analysis

AQ-1: The proposed Project would not conflict with or obstruct implementation of the applicable air quality plans or result in a cumulatively considerable net

increase of any criteria pollutant considered in non-attainment under either the SCAQMD or AVAQMD.

As previously discussed, in analyzing future pollutant emissions in the county, SCAQMD's 2022 AQMP and AVAQMD's Federal 70 ppb Ozone Attainment Plan both rely upon growth projections, which are based in part on SCAG's Demographics and Growth Forecast 2024-2050, as well as transportation activity data from SCAG's Connect SoCal RTP/SCS. SCAG compiles growth estimates received from individual jurisdictions and generates projections for the region (SCAG 2024). When the SCAG projections are released, regulatory documents such as a general plan or specific plan are considered to comply with SCAG projections, as the information contained in such documents has at that point been incorporated into the SCAG projections. SCAG updates the regional forecasts and projections approximately every five years. In April 2024, SCAG adopted the Connect SoCal 2024 Plan, which uses growth projections from the 2050 Demographics and Growth Forecast published the same year (SCAG 2024).

Pursuant to SCAQMD and AVAQMD adopted methodologies, a project is deemed inconsistent with the air quality plan if it results in an inconsistency with existing land use plans that inform growth estimates in the applicable air quality plan (SCAQMD 2024; AVAQMD 2023). Zoning changes, specific plans, general plan amendments, and similar land use plan changes that do not increase dwelling unit density, vehicle trips, or vehicle miles traveled are deemed to not exceed this threshold (Los Angeles County 2014).

As detailed in Chapter 2, *Project Description*, the proposed Project consists of amendments to the LACC to establish certain commercial cannabis businesses as an allowed use within existing eligible zoning districts. The proposed Project would not change the land use or zoning designation of any site, and it would not result in substantial, new physical development; only limited interior and exterior site improvements (e.g., new signage and lighting) would occur to support cannabis businesses within constructed and permitted structures. Additionally, the proposed Project would not affect the population or land use buildout established by the RTP/SCS and the County of Los Angeles's 2035 General Plan. Therefore, the proposed Project would be consistent with these plans and the related growth estimates in the applicable air quality plan, resulting in impacts that would be *less than significant*.

Future operation of licensed commercial cannabis businesses enabled by the proposed Project would generate criteria air pollutant emissions. Traditionally, operations that generate emissions include mobile source vehicle trips by employees and patrons, use of facility equipment, energy consumption, and the provision of water. As described further in Chapter 3, *Environmental Impact Analysis*, the location and total number of different cannabis licensed sites would vary depending on the adopted regulations and the degree to which applicants can find a suitable location for their chosen cannabis business type. However, the types and quantity of emissions generated by licensed cannabis businesses would not be atypical of emissions generated by other uses already allowed under the LACC

within the eligible zone district. Further, it must be noted that in many cases, operational emissions from licensed cannabis businesses would not represent entirely new emissions, as the licensing of cannabis businesses would not involve development of vacant or undeveloped sites and cannabis businesses would occupy existing developed structures that may have previously supported existing uses which generated emissions. Regardless, as presented above in Tables 3.1-9 and 3.1-10, individually, the operation of licensed commercial cannabis businesses would generate negligible criteria pollutant emissions that would not exceed applicable SCAQMD or AVAQMD daily or annual thresholds of significance. Therefore, impacts to air quality related to cumulatively considerable operational emissions would be *less than significant*.

AQ-2: The proposed Project would not expose sensitive receptors to substantial pollutant concentrations.

Sensitive receptors are people in the population who are particularly susceptible to health effects due to exposure to air contaminants. 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 substantial construction activities that expose sensitive receptors to substantial pollutant concentrations. Cannabis business activities would exclusively take place in commercial, commercial-only mixed-use, 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 eligible zones is unknown and, consequently, their location relative to sensitive receptors is unknown at this time.

Toxic Air Contaminants and Adverse Health Risks

The proposed Project would not place sensitive land uses within the buffer zones recommended by CARB, SCAQMD, and AVAQMD, and the uses enabled by the proposed Project are not considered to be operational point-sources of TACs. Operation of new licensed cannabis businesses would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as the use of chemicals (e.g., pesticides, fertilizers) for landscaping or application of cleaning solutions that would not be considered major sources of TACs. Therefore, impacts to sensitive receptors from TACs are considered *less than significant*.

CO Hotspots

As previously discussed in Section 3.1.4, *Thresholds of Significance,* while thresholds have been adopted for determining impacts from the generation of a CO "hot spot," past studies by the SCAQMD have concluded that localized CO impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards.

Despite the uncertainty of the exact location of each commercial cannabis business and the concentration of traffic volume in those areas, as discussed in Impact AQ-1 and presented in Table 3.1-9 and 3.1-10, criteria pollutant emissions resulting from the operations of commercial cannabis businesses would not exceed existing SCAQMD and AVAQMD thresholds of significance. Therefore, the proposed Project would not result in the creation of a CO hot spot or exceed any of the federal and state ambient air quality standards (NAAQS and CAAQS). Because emissions from independent operations would not generate levels of emissions that would adversely affect local air quality and public health, impacts to sensitive receptors are considered *less than significant*.

AQ-3: The proposed Project will not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people.

According to the SCAQMD CEQA Air Quality Handbook, other emissions, such as those leading to objectionable 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. Tetrahydrocannabinol (THC), the cannabinoid primarily responsible for cannabis' psychoactive effects, does not emit odor.

However, the proposed Project only allows for indoor cannabis cultivation and manufacturing, as described in Chapter 2, *Project Description*. In addition, all commercial cannabis businesses would be subject to all applicable LACC regulations, including Chapter 11.37, Section 11.37.070, that requires the development and implementation of an odor management plan that would be subject to the Public Health Department's review and approval. Odor management plans must prevent odors from a cannabis facility from being detected by a person outside of the facility or indoor cultivation site.

Other applicable regulations are enforced by the SCAQMD and AVAQMD; each District has 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 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 from 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 businesses but would not generate long-term odor impacts.

Therefore, because the proposed Project is not expected to increase the exposure of people to emissions or odors, impacts are considered to be *less than significant*.

3.1.6 Cumulative Impacts

The implementation of the proposed Project would not result in substantial, new physical development; only limited interior and exterior site improvements (e.g., new signage and lighting) would potentially occur to support cannabis businesses within constructed and permitted structures and result in negligible construction related emissions. Additionally, as discussed above, operational emissions would have a less than significant impact on air quality. All commercial cannabis operations would be required to comply with all applicable air quality regulations as enforced by the SCAQMD, AVAQMD, and the County. As such, the proposed Project would not result in cumulatively considerable emissions of criteria pollutants and cumulative impacts to air quality would be *less than significant*.

3.1.7 Mitigation Measures

The proposed Project would result in *less than significant* impacts regarding air quality. Therefore, no mitigation measures are required.

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3.2 ENERGY

The Commercial Cannabis Business Licensing Program (Project) would license cannabis activities that would result in direct and indirect consumption of energy resources. A significant energy impact would occur if the proposed Project would consume electricity, natural gas, or transportation fuels in a wasteful, excessive, or inefficient manner. However, pursuant to the proposed Los Angeles County Code (LACC) amendments, all commercial cannabis businesses would occupy existing buildings that are located within urban and suburban areas that currently consume energy resources for non-cannabis uses. Therefore, such buildings would have the capacity to accommodate future cannabis operations and would not result in the wasteful, excessive, or inefficient consumption of energy resources.

This section evaluates energy-related impacts associated with the proposed Commercial Cannabis Business Licensing Program (Project) and identifies measures to avoid or reduce any inefficient, wasteful, or unnecessary consumption of energy. The information has been prepared in accordance with Public Resources Code (PRC) Section 21100(b)(3), California Environmental Quality Act (CEQA) Guidelines Section 15126.2(b), and CEQA Guidelines Appendix F. Given that the proposed Project consists of amendments to the LACC and other planning documents, the following analysis focuses on the indirect energy-related impacts associated with the commercial cannabis activities and associated development that would be permissible pursuant to the proposed Project.

A summary of the impacts related to energy resources identified in this Section is provided in Table 3.2-1.

Table 3.2-1. Energy Summary of Impacts

Energy Impacts	Mitigation Measures	Impact Classification
Impact EN-1. The proposed Project would not create a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	None required	Less than significant
Impact EN-2. The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	None required	Less than significant
Cumulative Impacts	None required	Less than significant

3.2.1 Background

Electricity

The production of electricity requires the consumption or conversion of other natural resources, whether it be water (hydroelectric power), wind, oil, gas, coal, or solar energy. The delivery of electricity as a utility involves several system components for distribution and use. Electricity is distributed through a network of transmission and distribution lines referred to as a power grid. Energy capacity, or electrical power, is generally measured in watts (W), while energy use is measured in watt-hours (Wh), which is the integral electricity consumption over a period of one hour. On a utility-scale, the capacity of electricity generation and amount of consumption is generally described in megawatts (MW) and megawatt-hours (MWh), respectively. Southern California Edison (SCE) is the electricity provider for the unincorporated areas of the county, and is discussed in greater detail in Section 3.2.2, *Environmental Setting*.

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is a fossil energy source formed deep beneath the Earth's surface. Surveys are performed to identify potential productive natural gas deposits, and wells are drilled either vertically or horizontally to extract the gas from its origin. Natural gas consumed in California is obtained from subterranean reservoirs and delivered through high-pressure transmission pipelines. Natural gas provides almost one-third of the total energy requirements in California and generally is measured in units of standard cubic feet or British thermal units (BTU). The Southern California Gas Company (SoCalGas) is the natural gas provider for the unincorporated areas of the county, and described in greater detail in Section 3.2.2, *Environmental Setting*.

Transportation Fuels

The spark-ignited internal combustion engines of on-road motor vehicles and off-road equipment use fossil fuel energy for propulsion. Gasoline and diesel fuel are formulations of fossil fuels refined for use in various applications. Gasoline is the primary fuel source for most passenger automobiles, and diesel fuel is the primary fuel source for most off-road equipment and medium and heavy-duty trucks. The assessment of energy resources includes a quantitative evaluation of the transportation fuels that would be consumed during construction and operation of the Project.

Other aspects of the potential environmental impacts related to energy resources are assessed in sections of this Program Environmental Impact Report (EIR) as follows: criteria air pollutant emissions are addressed in Section 3.1, *Air Quality*; greenhouse gas (GHG) emissions are addressed in Section 3.3, *Greenhouse Gas Emissions*; vehicle trips and vehicle miles traveled (VMT) are addressed in Section 3.6, *Transportation*; and utility services are addressed in Section 3.7, *Utilities/Service Systems*.

3.2.2 Environmental Setting

Existing Energy Conditions

Electricity

The California Energy Commission (CEC) manages electricity, natural gas, and renewable energy production, consumption, research, and conservation within the state. In 2023, Californians consumed 276,231 gigawatt hours (GWh) of electricity, with Los Angeles County consuming 62,908 GWh—or approximately 22.77 percent of the State's electricity usage (CEC 2023a).

SCE is the electricity provider for the unincorporated area of Los Angeles County. Serving over 15 million people across the central, coastal, and southern regions of California, SCE receives electrical power from various energy resources. According to the 2023 SCE Power Content Label, SCE's primary generation resources were eligible renewable energy (37.6 percent), unspecified power (28.8 percent), and natural gas (20 percent) (SCE 2023). Unspecified power refers to electricity purchased through open market transactions and not traceable to a specific generation source.

Compared to the aggregate power mix of California (i.e., the combined power mix of all energy providers), SCE differs by utilizing a slightly higher percentage of eligible renewable energy resources, a lower percentage of natural gas, and a higher percentage of unspecified power (see Table 3.2-2) (SCE 2023).

Table 3.2-2. Southern California Edison Power Content Label

Energy Resources	SCE Power Mix	SCE Green Rate	2023 California Power Mix
Eligible Renewable	37.5%	100%	36.9%
- Biomass & Biowaste	*0.1%*	*0%*	*2.1%*
- Geothermal	*5.2%*	*0%*	*4.8%*
- Eligible Hydroelectric	*0.7%*	*0%*	*1.8%*
- Solar	*19.8%*	*100%*	*17.0%*
- Wind	*11.7%*	*0%*	*11.2%*
Coal	0%	0%	1.8%
Large Hydroelectric	4.5%	0%	11.7%
Natural Gas	20.0%	0%	36.6%
Nuclear	9.1%	0%	9.3%
Other	0.1%	0%	0.1%
Unspecified*	28.8%	0%	3.7%
Total	100%	100%	100%

Source: SCE 2023.
Notes: "Unspecified" means electricity from transactions that are not traceable to specific generation sources.

Natural Gas

According to the CEC, California consumed 1,196,114.41 million cubic feet (cf) of natural gas in 2023. Los Angeles County made up about 24.69 percent of this usage, consuming about 295,329.48 million cf (CEC 2023b).

Servicing central and southern regions of California, SoCalGas is the natural gas provider for the unincorporated area of Los Angeles County. SoCalGas delivers about 2.54 billion cf of natural gas a day through an integrated gas transmission system consisting of pipeline and storage facilities (California Gas and Electric Utilities 2024). Most of the natural gas is produced from out-of-state basins in New Mexico and Texas, with the remaining supply produced locally in Central and Southern California.

Transportation Fuels

The two major types of transportation fuels used in the U.S. are gasoline and distillates/diesel. As petroleum products, gasoline and distillates are made from crude oil, a nonrenewable energy source that contributes to GHG emissions. The CEC estimates that about 50 percent of GHG emissions in California are from the transportation sector.

The CEC maintains a statewide database of annual transportation fuel retail sales in accordance with the Petroleum Industry Information Reporting Act called the California Retail Fuel Outlet Annual Reporting (CEC-A15) system. According to the 2023 CEC-A15 data, Los Angeles County is the largest consumer of transportation fuels in the State. The county accounts for approximately 22.39 percent of statewide gasolines sales and 12.52 percent of statewide diesel sales—or 3,039 million gallons and 290 million gallons, respectively (CEC 2024).

3.2.3 Regulatory Setting

Federal, state, and local laws and regulations have been enacted that address energy consumption and efficiency from various end uses.

Federal Regulations

At the federal level, the U.S. Environmental Protection Agency (USEPA), the U.S. Department of Energy, and the U.S. Department of Transportation are the three agencies with the most influence over national energy policies, especially transportation energy consumption. Generally, federal agencies establish and enforce fuel economy standards for automobiles and light trucks, fund energy-related research and development projects, and transportation infrastructure projects to manage transportation energy resource demand.

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the U.S. Pursuant to this Act, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for

passenger cars and light trucks were approved for model years 2017 through 2021 (77 Federal Register [FR] 62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the U.S.

Energy Policy Act of 1992

The Energy Policy Act of 1992 is intended to reduce U.S. dependence on foreign petroleum and improve air quality. The Energy Policy Act includes several provisions intended to build an inventory of alternative fuel vehicles in large, centrally fueled fleets in metropolitan areas. The Energy Policy Act requires certain federal, State, and local government and private fleets to purchase a percentage of light duty alternative fuel vehicles each year. Financial incentives were also included in the Energy Policy Act, such as federal tax deductions for businesses and individuals to cover the incremental cost of alternative fuel vehicles. States also are required by the Energy Policy Act to consider a variety of incentive programs to help promote the expansion of alternative fuel vehicle fleets.

Energy Policy Act of 2005

The Energy Policy Act of 2005 includes provisions for renewed and expanded tax credits for electricity generated by qualified energy sources (i.e., landfill gas), provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification, and establishes a federal purchase requirement for renewable energy called the Renewable Fuels Standard (RFS).

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act (EISA) was signed into law. This federal legislation requires ever-increasing levels of renewable fuels to replace petroleum. The USEPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the U.S. contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the U.S. As required under the Act, the original RFS program required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded to reduce GHG emissions from the use of renewable fuels, decrease imported petroleum, and promote the growth of the renewable fuels sector in the U.S.

The EISA includes key provisions to increase energy efficiency and the availability of renewable energy, thereby reducing GHG emissions. The EISA requires the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy

efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Achieving approximately 25 percent greater efficiency for light bulbs by phasing out old incandescent light bulbs between 2012 and 2014, and requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and,
- While superseded by the 2019 USEPA and NHTSA actions described in Section 3.1, *Air Quality*, the EISA included: (1) establishing a minimum average fuel economy of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by 2020; and (2) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

Vehicle Emission Standards

In 2009, a national policy was adopted for fuel efficiency and emissions standards in the U.S. auto industry, which applies to passenger cars and light-duty trucks for model years 2012 to 2016 (referred to as the Pavley standards). The standards surpass the prior Corporate Average Fuel Economy standards and required an average fuel economy standard of 35.5 mpg and average of 250 grams of carbon dioxide (CO_2) per mile by model year 2016, based on USEPA calculation methods (Voorhees 2009).

In 2012, standards were adopted for model year 2017 to 2025 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and a maximum of 163 grams of CO_2 per mile. According to the USEPA, a model year 2025 vehicle would emit approximately one-half of the GHG emissions from a model year 2010 vehicle.

On April 12, 2023, the USEPA announced new, more ambitious proposed standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027 (USEPA 2025).

Greenhouse Gas Emissions Standards for Medium- and Heavy- Duty Vehicles

The USEPA and NHTSA have adopted a series of standards for medium- and heavy-duty vehicles that would improve fuel efficiency, reduce carbon pollution, and mitigate climate change impacts.

In September 2011, Phase 1 of the program was adopted. This initial phase established the first fuel efficiency requirements for medium- and heavy-duty vehicles for vehicle model years 2014 to 2018.

In October 2016, Phase 2 was finalized for medium- and heavy-duty vehicle standards that would cover model years 2019 to 2021 for semi-trucks, large pickup trucks, vans, buses, and work trucks.

In March 2024, Phase 3 was adopted to revise existing standards for heavy-duty vehicles in model year 2027 and establish new standards for model years 2028 to 2032. Phase 3 applies to heavy-duty vocational vehicles (e.g., delivery trucks, refuse haulers, public utility trucks, transit, and shuttles) and tractors (e.g., day cabs and sleeper cabs on tractor-trailer trucks).

State Regulations

California has adopted statewide legislation to address issues related to various aspects of energy consumption and efficiency. Several regulatory entities administer energy policy throughout the state. The California Public Utilities Commission (CPUC) is a State agency created by a constitutional amendment to regulate privately owned utilities providing telecommunications, electric, natural gas, water, railroad, rail transit, and passenger transportation services. The CPUC is responsible for assuring that California utility customers have safe, reliable utility services at reasonable rates, while protecting utility customers from fraud. The CPUC regulates the planning and approval of physical construction of electric generation, transmission, or distribution facilities and local distribution pipelines of natural gas. The CEC is the primary energy policy and planning agency in California. Created by the State Legislature in 1974, the CEC has five major responsibilities: forecasting future energy needs and maintaining a historical energy database; licensing thermal power plants 50 MW or larger; promoting energy efficiency through appliance and building standards; developing energy technologies and supporting renewable energy; and planning for, and directing statewide response to, energy emergencies.

Warren-Alquist Act

The California Legislature passed the Warren-Alquist Act in 1974. The Warren-Alquist Act created the CEC. The legislation directed the CEC to formulate and adopt the nation's first energy conservation standards for both buildings constructed and appliances sold in California; removed the responsibility of electricity demand forecasting from the utilities, which had a financial interest in high-demand projections, and transferred it to a more impartial CEC; and directed CEC to embark on an ambitious research and development program, with a particular focus on fostering what were characterized as non-conventional energy sources.

Renewable Energy Standard/Renewable Portfolios Standard

- Senate Bill (SB) 1078, SB 107, and SB X1-2: SB 1078 (2002) and SB 107 (2006) created the Renewable Energy Standard, which required electric utility companies to increase procurements from eligible renewable energy resources by at least 1 percent of their retail sales annually until reaching 20 percent by 2010. SB X1-2 (2011) requires a Renewables Portfolio Standard, similar to the Renewable Energy Standard, of 33 percent by 2020. SB 350, described below, increased the renewable requirement to 50 percent for 2030.
- SB 350: SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 under Executive Order (EO) S-14-08 to 50 percent by 2030. This

objective will increase the use of Renewables Portfolio Standard-eligible resources, including solar, wind, biomass, geothermal, and others. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. To help meet these goals and reduce GHG emissions, large utilities will be required to develop and submit Integrated Resource Plans. These plans detail how utilities will meet their customers' resource needs, reduce GHG emissions, and increase the use of clean energy resources. SB 350 also transforms the California Independent System Operator, a nonprofit public corporation, into a regional organization, contingent upon approval from the State legislature. The bill also authorizes utilities to undertake transportation electrification.

- SB 100: SB 100 created the 100 Percent Clean Energy Act of 2018, which mandates that all electricity in California must be obtained from renewable and zero-carbon energy sources by 2045. The policy includes updated and additional Renewable Portfolio Standards for investor- and publicly-owned utility providers at milestone years; specifically, providers must have a renewable energy supply of: (1) 44 percent by 2024; (2) 52 percent by 2027; and (3) 60 percent by 2030, as opposed to the original 50 percent that was mandated by SB 350. Further, SB 100 requires the CEC, CPUC, and the California Air Resources Board (CARB) to prepare a reoccurring joint report to evaluate the challenges and opportunities in implementing SB 100.
- SB 1020: SB 1020 created the Clean Energy, Jobs, and Affordability Act of 2022. It revises the state policy established by SB 100 by adding interim targets for obtaining renewable and zero-carbon energy sources by 2045. SB 1020 mandates renewable energy and zero-carbon resource suppliers to provide 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. Further, it requires all State agencies to procure 100 percent of renewable and zero-carbon electricity by 2035.
- EO N-79-20: On September 23, 2020, Governor Gavin Newsom signed EO N-79-20, issuing a statewide goal and time frame for transitioning to zero-emission (ZE) vehicles. The order mandates all passenger cars and trucks, drayage trucks, and off-road vehicles and equipment sold in California to be 100 percent zero-emission by 2035. Additionally, 100 percent of medium- and heavy-duty vehicles shall be zero-emission by 2045. The executive order directs various state agencies to develop strategies to promote the adoption of ZE vehicles, including strategies related to interagency coordination, market development, infrastructure upgrades, multimodal transportation plans, climate change regulations, and community support.

Advanced Clean Fleets and Advanced Clean Trucks Regulation

In April 2023, CARB released the Advanced Clean Fleets (ACF) regulation to accelerate the transition to zero-emission medium- and heavy-duty vehicles. The ACF regulation mandates that manufacturers may only sell ZE medium- and heavy-duty vehicles starting in 2036. Beginning January 1, 2024, drayage trucks must be registered in the CARB Online System to conduct drayage activities in California. Federal and high-priority fleets must comply with a Model Year Schedule, requiring fleets to purchase only ZE vehicles starting

in 2024. State and local agencies are required to ensure 50 percent of vehicle purchases are ZE beginning in 2024 and 100 percent by 2027. In tandem with the ACF regulation, CARB also issued the Advanced Clean Trucks (ACT) regulation to focus on transitioning vehicles to zero emissions for trucks classified from Class 2b to Class 8. Similar to ACF, the ACT mandates an increase in ZE truck sales and requires a company and fleet reporting system.

California Building Standards Code

California Code of Regulations (CCR), Title 24, or the California Building Code (CBC), which establishes the regulations for building construction and system design and installation to achieve energy efficiency and preserve outdoor and indoor environmental quality. The CBC includes the following subparts that are most applicable to development that would result from the proposed Project.

CCR, Title 24, Part 6 comprises the California Energy Code, which was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to increase the baseline energy efficiency requirements. The Title 24 standards were updated in 2021 and became effective on January 1, 2023. The updated standards apply to all buildings for which an applicable building permit is submitted on or after January 1, 2023, and established new standards for electric-ready requirements, expanded solar photovoltaics (PV) and battery storage, and strengthened ventilation standards for improved air quality. The Title 24 standards also include efficiency improvements to the residential standards for attics, walls, water heating, and lighting; and efficiency improvements to the non-residential standards to be aligned with the American Society of Heating and Air-Conditioning Engineers 90.1-2013 National Standards. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy-efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

CCR, Title 24, Part 11 comprises CALGreen, that establishes mandatory green building code requirements as well as voluntary measures (Tier 1 and Tier 2) for new buildings in California. The mandatory provisions in CALGreen will reduce the use of volatile organic compound (VOC) emitting materials, strengthen water efficiency conservation, increase construction waste recycling, and increase energy efficiency. Tier 1 and Tier 2 are intended to further encourage building practices that minimize the building's impact on the environment and promote a more sustainable design.

State of California 2015 Integrated Energy Policy Report

On April 29, 2015, Governor Jerry Brown signed EO B-30-15, establishing a new statewide goal to reduce GHG emissions 40 percent below 1990 levels by 2030. SB 1389 (Bowen, Chapter 568, Statutes of 2002) requires CEC to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies;

enhance the state's economy; and protect public health and safety. The 2024 Integrated Energy Policy Report provides the results of the CEC's assessments of a variety of energy issues facing California (CEC 2024).

Regional and Local Regulations

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties. SCAG addresses regional issues related to transportation, the economy, community development, and the environment. SCAG develops plans pertaining to transportation, growth management, hazardous waste management, housing, and air quality. SCAG prepares the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that supports the land use and transportation components of the Air Quality Management Plans, which provide GHG-reduction co-benefits. The 2024-2050 RTP/SCS, also known as "Connect SoCal 2024," was approved by SCAG's Regional Council in April 2024, and serves to provide a clear, long-term vision of the regional transportation and land use goals, policies, objectives, strategies, and investments for the SCAG region while at the same time providing strategies to meet GHG emissions reduction and air quality conformity requirements. The 2024–2050 RTP/SCS divides the challenges facing the region into four main areas with further subdivision of issues including: 1) mobility; 2) communities; 3) environment; and 4) economy. Specifically, the Plan was developed to achieve targets for GHG emissions reductions, consistent with SB 375 and other regional goals. This includes a description of how the region can attain the GHG emission-reduction targets set by CARB by achieving a 19 percent reduction in GHG emissions by 2035 compared to the 2005 level (SCAG 2024).

South Coast Air Quality Management District

As discussed in Section 3.1, *Air Quality*, the South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the South Coast Air Basin (where the County is located) and developing rules and regulations to bring the Air Basin into attainment of the ambient air quality standards. To reduce local air pollution, SCAQMD has promoted several programs supporting energy conservation, low-carbon fuel technologies (e.g., natural gas vehicles; electric hybrids, hydraulic-hybrids, and battery-electric vehicles), renewable energy, VMT reduction, and market incentive.

Antelope Valley Air Quality Management District

As discussed in Section 3.1, *Air Quality*, the Antelope Valley Air Quality Management District (AVAQMD) operates monitoring stations in the Antelope Valley, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. Similar to SCAQMD, the AVAQMD enforces rules associated with different performance standards for new stationary sources and promotes incentive programs to promote energy

efficiency and conservation, low-carbon fuel technologies (e.g., natural gas vehicles, electric vehicles [EVs] and public EV chargers, hydraulic-hybrids, and battery-electric vehicles), and other renewable energy sources.

Los Angeles County 2035 General Plan

Adopted in 2015, the Los Angeles County 2035 General Plan guides the long-term physical development and conservation of unincorporated areas through a framework of goals, policies, and implementation programs. It also serves as an advisory document to coordinate land use planning, public service and facilities planning, circulation and transportation planning, and environmental management initiatives. Through a series of principles, goals, and policies, the General Plan guides the county towards healthy, livable, and sustainable communities. The General Plan includes the Mineral and Resources section of the Conservation and Natural Resources Element, as well as the Air Quality Element, for policies on energy conservation and promoting renewable energy. Applicable policies are provided below.

Air Quality (AQ) Element

- Policy AQ 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.
- Policy AQ 1.2: Encourage the use of low or no volatile organic compound (VOC) emitting materials.
- Policy AQ 1.3: Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.
- Policy AQ 1.4: Work with local air quality management districts to publicize air quality warnings, and to track potential sources of airborne toxics from identified mobile and stationary sources.
- Policy AQ 2.1: Encourage the application of design and other appropriate measures when siting sensitive uses, such as residences, schools, senior centers, daycare centers, medical facilities, or parks with active recreational facilities within proximity to major sources of air pollution, such as freeways.
- Policy AQ 2.10: Encourage the use of zero-emission and near-zero-emission construction, agriculture, and manufacturing equipment and freight decarbonization technologies, such as charging infrastructure for freight vehicles.
- Policy AQ 3.2: Reduce energy consumption in existing buildings and County operations through energy efficiency retrofits.
- Policy AQ 3.5: Phase in the decarbonization of existing and new development.

Conservation and Natural Resources (C/NR) Element

- Policy C/NR 12.1: Encourage the production and use of renewable energy resources.
- Policy C/NR 12.2: Encourage the effective management of energy resources, such as ensuring adequate reserves to meet peak demands.

- Policy C/NR 12.3: Encourage distributed systems that use existing infrastructure and reduce environmental impacts.

Los Angeles County Community and Area Plans

Los Angeles County has adopted certain area and community plans that include energy conservation policies that apply to development within the area to which each plan applies (Los Angeles County Long Range Planning n.d.). The following sets forth the energy conservation policies of the plans that involve areas in which commercial cannabis activities would be allowed:

Antelope Valley Area Plan (2015):

- Goal COS (Conservation and Open Space) 10: Diverse energy systems that utilize existing renewable or waste resources to meet future energy demands.
    - Policy COS-10.1: Encourage the use of non-hazardous materials in all individual renewable energy systems and all utility-scale renewable energy production facilities to prevent the leaching of potentially dangerous run-off materials into the soil and watershed.
    - Policy COS 10.6: Encourage the development of Conversion Technologies such as anaerobic digestion and gasification for converting post recycled residual waste into renewable fuels and energy.
- Goal COS 11: Energy systems for use in public facilities that reduce consumption of non-renewable resources while maintaining public safety.
    - Policy COS 11.1: Promote energy retrofits of existing public facilities throughout the County to complement and reduce dependence upon utility-scale renewable energy production facilities.
- Goal COS 14: Energy infrastructure that is sensitive to the scenic qualities of the Antelope Valley and minimizes potential environmental impacts.

Hacienda Heights Community Plan (2011):

- Policy PS (Public Services and Facilities) 6.3: Ensure adequate energy from both traditional and alternative sources whenever available while promoting more sustainable alternatives.

Santa Clarita Valley Area Plan (2012):

- Objective LU (Land Use) 7.1: Achieve greater energy efficiency in building and site design.
    - Policy LU-7.1.2: Promote the use of solar panels and renewable energy sources in all projects.
    - Policy LU-7.1.3: Encourage development of energy-efficient buildings and discourage construction of new buildings for which energy efficiency cannot be demonstrated.
    - Policy LU-7.1.4: Support the establishment of energy-efficient industries in the Santa Clarita Valley.

- Policy CO-4.1.6: Support amendments to the County Building Code that would promote upgrades to water and energy efficiency when issuing permits for renovations or additions to existing buildings.
- Goal CO-8: Development designed to improve energy efficiency, reduce energy and natural resource consumption, and reduce emissions of greenhouse gases.
  - Objective CO-8.2: Reduce energy and materials consumption and greenhouse gas emissions in public uses and facilities.
  - Policy CO-8.2.1: Ensure that all new County buildings and all major renovations and additions meet adopted green building standards, with a goal of achieving the LEED (Leadership in Energy and Environmental Design) Silver rating or above, or equivalent, where appropriate.
  - Policy CO-8.2.2: Ensure energy efficiency of existing public buildings through energy audits and repairs, and retrofit buildings with energy efficient heating and air conditioning systems and lighting fixtures.
  - Policy CO-8.2.3: Support purchase of renewable energy for public buildings, which may include installing solar photovoltaic systems to generate electricity for County buildings and operations and other methods as deemed appropriate and feasible, in concert with significant energy conservation efforts.
  - Policy CO-8.3.2: Promote construction of energy efficient buildings through the certification requirements of the ordinances developed through the County's Green Building Program.
  - Policy CO-8.3.3: Promote energy efficiency and water conservation upgrades to existing non-residential buildings at the time of major remodel or additions.

OurCounty: The Los Angeles Countywide Sustainability Plan

Adopted by the County Board of Supervisors in August 2019, OurCounty: The Los Angeles Countywide Sustainability Plan is a shared vision for what local governments and stakeholders can do to protect the environment, improve economic opportunity, and advance equity within the unincorporated area. This Plan outlines energy-specific strategies, targets, and actions, such as achieving 100 percent renewable energy by 2025 (Target for Strategy 7A); reducing building energy use intensity by 35 percent by 2045 (Target for Strategy 9C); and adopting an energy and water efficiency ordinance to require building owners to report their energy and water use (Action 117).

2045 Los Angeles County Climate Action Plan

The 2045 Los Angeles County Climate Action Plan (CAP) is a series of strategies, measures, and actions to mitigate the unincorporated areas' GHG emissions. This Plan aligns with the County's commitments to the 2016 Paris Climate Agreement and the *We Are Still In* Declaration, which pledges the County to adapting its programs and services to reduce GHG emissions and help limit global temperature increases. The 2045 CAP establishes two GHG emission reduction targets and one long-term goal:

- By 2030, reduce GHG emissions by 40 percent below 2015 levels.

- By 2035, reduce GHG emissions by 50 percent below 2015 levels.
- By 2045, achieve carbon neutrality in unincorporated Los Angeles County.

The Plan also focuses on building energy strategies, including transitioning existing buildings to all-electric (Measure E1), improving energy efficiency of existing buildings (Measure E4); and adopting building performance standards for existing buildings (Measure E4.1).

Los Angeles County Building Code, LACC Title 26 (2023)

The Los Angeles County Building Code, LACC Title 26, is known as the "Building Code," and provides regulations on design, construction, materials, occupancy, and maintenance of all buildings, structures, grading, and specific equipment. With its purpose to ensure safe, accessible, and sustainable buildings, Title 26 covers topics such as means of egress (Chapter 10), special safety provisions (Chapter 66); earthquake hazard reduction (Chapters 95 and 96); and grading (Appendix J).

Los Angeles County Specific Plans

Los Angeles County has adopted the following specific plans that include energy-related policies that apply to new development within the area that is subject to the respective specific plan.[1]

Florence-Firestone Transit Oriented District Plan (FFTODP): The FFTODP was adopted on February 7, 2023, and took effect in March of 2023. The FFTODP mirrors and builds on the policies of the Los Angeles County General Plan and the 2019 Florence-Firestone Community Plan. The FFTODP describes the current electrical infrastructure and describes targeted improvements to existing utility infrastructure that is needed for future implementation. The FFTODP also describes how energy infrastructure improvements would be supported by the California Climate Investments Program's (CCIP) cap-and trade initiative which aids communities in clean energy and energy efficiency funding for eligible disadvantaged communities.

Connect Southwest LA: A Transit Oriented District (TOD) Specific Plan for West Athens-Westmont Specific Plan: In July 2019, the Connect Southwest LA Specific Plan was adopted, setting a vision that describes the West Athens Westmont community's key values and aspirations for the future. This Plan sets forth a series of goals and policies related to energy resources, such as incentivizing solar installations for new and existing commercial

[1] The East LA 3rd Street Specific Plan was not included below because it does not detail specific energy policies or goals other than ensuring compliance with those included in the General Plan.

buildings and promoting low-interest financing for energy efficiency projects in existing developments.

Newhall Ranch Specific Plan: Adopted in May 2003, the Newhall Ranch Specific Plan outlines the regulations and design guidelines for development that may occur within the next 25 years. The Plan includes minor guidelines on energy conservation and usage, including land use planning objectives to reduce VMT and energy consumption.

West Carson TOD Specific Plan: The West Carson TOD Specific Plan, adopted in 2018, sets forth requirements for development to create an enhanced district identity, improve connections, and increase overall quality of life. This Plan includes policies and guidelines associated with responsible energy use, such as encouraging resource-efficient building materials for renovations and integrating sustainable design features, such as photovoltaic panels.

Willowbrook TOD Specific Plan: The Willowbrook TOD Specific Plan became effective in June of 2024. One of the goals of the Willowbrook TOD Specific Plan is to revitalize the community by facilitating development and improving access to differing modes of transportation. For new development, the Willowbrook TOD Specific Plan outlines Sustainable Design Guidelines that include energy efficiency measures including green roofs, solar panels, and increased implementation of shaded areas

Northlake Specific Plan: Adopted in 1992, the Northlake Specific Plan sets forth a development plan to balance a variety of land use types and intensities, including multiple schools, a library, and an 18-hole championship golf course. Policies and guidelines regarding energy consumption include fostering compatible land use arrangements to reduce dependence on private automobiles.

3.2.4 Impact Assessment Methodology

Significance Thresholds

Appendix G of the CEQA Guidelines sets forth the following thresholds for analyzing a project's impacts regarding energy. Los Angeles County uses these same thresholds and does not have unique energy thresholds in addition to the following. Appendix G states that a project normally would have a significant impact if the project would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and/or
- Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Methodology

The proposed Project consists of the adoption of amendments to the LACC and certain adopted County planning documents (e.g., applicable specific plans) that govern development to allow commercial cannabis activities within certain areas of the

unincorporated County. 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 as a result of implementation of the proposed Project to support cannabis businesses within constructed and permitted structures. Therefore, the proposed Project would not generate substantial short-term construction impacts associated with energy consumption. However, the proposed Project would permit new uses and associated physical development that would result in energy consumption that otherwise would not occur and is the subject of this analysis.

This section utilizes data from the CEC and the California Emissions Estimator Model (CalEEMod), consistent with the air quality analysis in Section 3.1, *Air Quality*, and the GHG emissions analysis in Section 3.3, *Greenhouse Gas Emissions*. Potential impacts of the proposed Project were evaluated by reviewing the characteristics of the proposed Project to assess its potential to affect the capacities of energy service utilities. CalEEMod modeling was utilized to establish small-scale, independent emissions scenarios for each allowable cannabis business type, excluding distribution and microbusiness operations.[2,3] Despite the development standards found in the proposed commercial cannabis regulations, which are further described in Chapter 2, *Project Description*, that would limit certain commercial cannabis activities, it cannot be determined with certainty the specific locations, sizes, and amount of new physical development and operational levels that would result from permissible commercial cannabis activities.[4] Consequently, detailed modeling of energy consumption resulting from the overall operation of all future commercial cannabis activities from the proposed Project are speculative. Therefore, quantification of energy consumption associated with new commercial cannabis business operations cannot be

[2] Cannabis distribution includes the procurement, sale, and transport of cannabis and cannabis products between licensed businesses. Distribution in this context emulates the same energy consumption scenario as retail operations and therefore was not independently analyzed.

[3] Based on the Project's description, microbusinesses consist of at least three small-scale cannabis business types, and there is no limit to the number of cannabis microbusiness licenses that would be allowed within unincorporated areas of the county. However, it should be noted that each use included in a microbusiness would count toward the use's respective cap on licenses in the applicable unincorporated area. Because of this, there is no way to accurately predict which business types would make up each microbusiness or how many microbusiness licenses would be approved. Because of this, there is no way to accurately predict which business types would make up each microbusiness or how many microbusiness licenses would be approved. Therefore, creating a hypothetical scenario to be inputted into CalEEMod would be overly speculative. Instead, a conservative estimate can be identified by adding together the energy consumption estimates from the three cannabis business types with the most energy demand, as determined by CalEEMod.

[4] Details on the analysis and methodology for each CalEEMod scenario, including further explanation of data points utilized for various calculation defaults (i.e., size [square footage], location, etc.) and presented in Appendix D.

cumulatively estimated; CalEEMod models of energy consumption are presented to aid in the understanding of energy consumption on a single operation/facility scale.

The following analysis utilizes a programmatic approach to evaluate the energy usage impacts associated with the proposed Project and emphasizes the thresholds involving compliance with the rules and regulations of the County, the established criteria from CEQA Guidelines Appendix G, and consistent with the analysis in Section 3.1, *Air Quality* and Section 3.3, *Greenhouse Gas Emissions*. Accordingly, the proposed Project would cause a significant impact on energy resources if energy consumption exceeds the projected supply or delivery capacity of either the electric or natural gas systems of the County, or if the proposed Project would conflict with applicable renewable energy or energy efficiency plans, policies, standards, or regulations.

Operation of the commercial cannabis businesses resulting from implementation of the proposed Project would require energy consumption involving the use of electricity, natural gas, and transportation fuels. 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 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]). However, certain features of cannabis operations (e.g., lighting, climate control systems, and odor control equipment, for indoor cultivation) could result in substantial demands for energy resources.

Annual electricity and natural gas demand for the proposed commercial cannabis business types were generated by the long-term operation of various commercial cannabis activities, were estimated on an independent scale using CalEEMod, and are summarized in Table 3.2-3. Depending on the type of activities being simulated, CalEEMod will include standardized default data for each land use and sub-land use category. Energy consumption for each allowed cannabis business type were calculated based on the most likely worst-case and unmitigated scenario. Because no new building development is proposed as a part of the proposed Project, CalEEMod scenarios only analyzed operational energy consumption for each business type. The year 2026 was utilized as the estimated start of operation and, therefore, all energy usage factors utilized reflect specific forecasted planning considerations, including future integration of renewables and advancement in energy efficiency technologies.

CalEEMod requires locations to be chosen for each modeling scenario. For the purposes of each scenario, the operation or facility location was chosen based on parcel eligibility (e.g., within unincorporated areas, developed, eligible zoning boundary). Each CalEEMod simulation calculated energy consumption for a single operation or facility. More details about location, zoning district eligibility, and land use type can be found in Appendix D.

Table 3.2-3. Annual Unmitigated Operational Energy Consumption per Commercial Cannabis Business Type

Commercial Cannabis Business Type	Electricity (kWh/yr)	Natural Gas (th/yr)
Cultivation	5,302,000	0
Retail	45,954	280.20
Manufacturing	9,592.7	428.12
Testing	17,820	253.52
Annual Totals	5,375,366.7	961.84

Note: kWh/yr = kilowatt-hours per year; th/yr = therms per year

Table 3.2-4. Los Angeles County Energy Demand

Year	Electricity (GWh)	Natural gas (million therms)
2023	62,908,000	2,954,000,000

Sources: CEC 2023; U.S. Energy Information Administration 2025.

3.2.5 Environmental Impacts Analysis

EN-1: The proposed Project would not create a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Construction

As previously described, 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 as a result of implementation of the proposed Project to support cannabis businesses within constructed and permitted structures. Consequently, implementation of the proposed Project, would not result in a significant amount of construction-related energy demand. The energy demand resulting from short-term construction activities involved with the establishment of a commercial cannabis business would be negligible when compared to existing energy demand for the unincorporated areas of the county. As such, construction-related energy consumption impacts are considered *less than significant*.

Operation

Operation of future commercial cannabis businesses resulting from the proposed Project would result in energy consumption as described further below.

Electricity

Among the various cannabis business types, indoor cultivation requires the highest energy demands due to the use of energy-intensive equipment, including high-intensity light fixtures, fans, climate control systems, CO_2 enrichment systems, air circulation and

ventilation systems, and water pumps (see Table 3.2-2). However, because commercial cannabis activities would replace businesses that currently occupy eligible sites or would occupy vacant (yet previously occupied and currently developed) properties, existing energy infrastructure would continue to serve the properties on which commercial cannabis businesses would be established. The proposed Project would not result in any growth or buildout that would require development of additional energy infrastructure or increase energy usage past assumed energy demand.

All future commercial cannabis operations would be required to comply with the applicable requirements of the 2045 CAP, CBC, CALGreen Code, and LACC (Title 26); operators would be required to demonstrate compliance with applicable requirements prior to obtaining a local license. Commercial cannabis businesses would receive renewable energy, similar to other businesses in the unincorporated areas of the county that have been receiving renewable energy since at least October 2022. In addition, certain commercial cannabis businesses would be required to comply with applicable Title 4 energy efficiency requirements. For example, indoor cultivation licensees would be required to limit electricity usage so that it does not exceed the average electricity GHG emissions intensity required by their local utility provider (e.g., SCE) pursuant to the California Renewables Portfolio Standard Program of the Public Utilities Code (Title 4, Division 19, Chapter 7, Article 2, § 16305(a), Renewable Energy Requirements). If the licensed cultivator's average weighted GHG emission intensity is greater than the local utility provider's GHG emission intensity, the licensee would be required to obtain carbon offsets to cover the excess carbon emissions from the previous annual licensed period [Ibid, § 16305(b), Renewable Energy Requirements).

Therefore, operations associated with the proposed Project would not result in the wasteful, inefficient, and/or unnecessary consumption of electricity, and impacts would be *less than significant*.

Natural Gas

The Project is not anticipated to result in substantial new demand for natural gas supplies. Apart from facility needs (e.g., building heating systems), natural gas is typically not required for commercial cannabis activities (e.g., cultivation and manufacturing operations). Given that commercial cannabis activities would be required to be located in existing buildings and would have similar demands for natural gas as uses that previously occupied the buildings, the proposed Project would result in a negligible increase in demand for natural gas supplies. Existing SoCalGas infrastructure and natural gas supplies are sufficient to meet any incremental increases in demand that could result from the proposed Project. As such, natural gas consumption would not substantially increase as a result of the proposed Project, and impacts would be *less than significant*.

Transportation Fuels

The proposed Project would result in the consumption of vehicle fuel as employees, distribution vehicles, lab testing vehicles, and customers would travel to and from any given licensed cannabis operation. The proposed Project would limit commercial cannabis businesses to eligible commercial, commercial-only mixed-use, industrial, and institutional zones. Based on the data collected by Fehr & Peers, cannabis businesses would not generate substantially more daily trips or have a substantial VMT impact when compared to existing uses allowed within commercial and industrial zoning districts. Most cannabis business types would typically result in less trips than other land uses allowed within those zones under existing land use designation and zoning regulations (see Appendix E). However, some uses, including cannabis retail uses, have the likely potential to result in greater trip generation than existing uses, and therefore have the potential to increase VMT when compared to existing conditions.

Regardless of the potential increase in VMT for some cannabis businesses as a result of the proposed Project, any increases in the demand for fuel within the county as a result of the licensing of commercial cannabis businesses are likely to negligibly affect transportation fuel supplies, which are considered at a statewide level of demand and supply. For instance, based on reported statewide fuel demands, an increase in countywide fuel demand by 5,000,000 gallons of fuel per year—or an addition of approximately 152 million miles of person vehicle travel—would constitute an increase in statewide fuel demands of less than 0.03 percent.

Given the foreseeable negligible increase in regional and statewide demand and use of vehicle fuels, the proposed Project is not anticipated to substantially constrain available supplies or result in the wasteful use of such resources. Impacts are therefore considered *less than significant*.

EN-2:	The proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The proposed Project may cause a significant environmental impact if it would conflict with applicable statewide or regional plans, policies, or regulations adopted to expand renewable energy resource infrastructure or achieve energy efficiency targets. As described in Section 3.2.3, *Regulatory Setting*, a robust set of regulations are in place pertaining to renewable energy and energy efficiency, as well as transportation fuel consumption. The following includes an analysis of the consistency of the proposed Project with applicable requirements which are derived from the County General Plan, LACC, CBC, CALGreen, OurCounty Sustainability Plan, 2045 CAP, and SCAG's 2024–2050 RTP/SCS.

General Plan and LACC

As previously described, commercial cannabis businesses resulting from the proposed Project would be subject to applicable LACC regulations and General Plan/Local Coastal Program (LCP) policies. The County would issue cannabis business licenses only for sites

zoned for cannabis uses under LACC Title 22 and that meet all other County requirements (e.g., locational, structural, and operational regulations of the LACC and policies of the General Plan/LCP). Prior to issuing a local license, the County would confirm that the prospective licensee has obtained approval of a Site Plan Review thereby demonstrating compliance with the LACC and General Plan/LCP. Therefore, all commercial cannabis activities resulting from the Project would comply with the County's General Plan/LCP and the LACC.

Title 24: Part 6 and Part 11 (CALGreen)

Title 24, Part 6, known as the Building Energy Efficiency Standards, establishes mandatory energy efficiency standards for residential and non-residential buildings, aimed at reducing energy consumption and promoting sustainability. Similarly, Part 11, known as CALGreen, outlines the State-mandated green building standards code. The CALGreen mandatory measures apply statewide, and the voluntary provisions can be adopted by local jurisdictions. In 2023, the County adopted the Los Angeles Green Building Standards Code which is based on CALGreen and includes requirements that would apply to commercial cannabis businesses resulting from the project. Because all commercial cannabis businesses would occur in previously existing structures, these parcels would be developed with structures that were established either prior to and comply with, or pre-date and do not comply with, the current Los Angeles Green Building Standards Code. If the structures pre-date and do not comply with the Los Angeles Green Building Standards Code, a commercial cannabis business could use them despite their noncompliance with the Los Angeles Green Building Standards Code, provided no new development requiring compliance with the current requirements occurs. If any development is required for commercial cannabis operations, applicants would need to obtain a building permit from the County and—given the type and amount of proposed redevelopment—may require the structure to be modified so that it complies with current building standards. Therefore, the Project would maintain overall compliance with Title 24, and those existing in legal non-conforming structures would not result in a net increase in energy usage.

OurCounty Sustainability Plan

The OurCounty Sustainability Plan outlines actions to decrease energy usage and reduce VMT. The Plan focuses on enhancing the well-being of every community in the County while reducing damage to the environment and adapting to the changing climate. As a strategic plan, the OurCounty Sustainability Plan does not supersede land use plans that have been adopted by the Regional Planning Commission and Board of Supervisors, including the Los Angeles County General Plan.

As stated previously, because the proposed Project would result in limited new development associated with a commercial cannabis businesses occupation of an existing, developed site, and would require all licenses to maintain compliance with LACC and the County's General Plan, it would not result in growth or substantial new development.

Moreover, all commercial cannabis licenses that result from the Project would be required to comply with the goals for increasing energy and water use efficiency within the OurCounty Sustainability Plan.

2045 Los Angeles CAP

The Los Angeles 2045 CAP outlines strategies to increase renewable energy production and improve energy efficiency. The 2045 CAP also aligns with the goals of the OurCounty Sustainability Plan. The County's 2045 CAP outlines performance goals and objectives for producing zero-carbon electricity and decarbonizing existing buildings in order to comply with the State's goal of reaching net zero GHG emissions no later than 2045 (AB 1279, EO-B-55-18). Since October 2022, all residents and businesses in the unincorporated county have been receiving 100 percent renewable energy through the Clean Power Alliance (County of Los Angeles 2024). All newly implemented commercial cannabis businesses would also fall under this category and support the goals outlined within the 2045 CAP. Any new development related to commercial cannabis businesses would be required to demonstrate consistency with the 2045 CAP's strategies, measures, and actions, the proposed Project would inherently ensure future compliance with energy efficiency targets.

Connect SoCal 2024

The Connect SoCal 2024 outlines population and economic growth projections for the County; all new development within the County must comply with the control measures and goals outlined in the 2024-2050 RTP/SCS. As stated above, the 2024-2050 RTP/SCS includes a description of how the region can attain CARB's GHG emission-reduction target, (i.e., a 19 percent reduction in GHG emissions by 2035 compared to the 2005 level) (SCAG 2024).

The proposed Project would not increase growth or buildout within the county that would conflict with the predictions and goals of the 2024-2050 RTP/SCS. The proposed Project does not involve, and would not result in, new housing development that would cause Los Angeles County to exceed the population growth forecasts set forth in the 2024-2050 RTP/SCS. Further, given the initial limitations on the number of licenses that would be issued, the requirement for commercial cannabis businesses to occupy existing buildings that are either currently or were previously occupied by other businesses, and at least most employees of future commercial cannabis businesses likely already reside in Los Angeles County, it is unlikely that the proposed Project would result in economic growth that could result in a corresponding increase in population growth that exceeds the forecasts set forth in the 2024-2050 RTP/SCS. Finally, the proposed Project would not conflict with the goals regarding improvements to mobility and access to diverse destinations, providing better "placemaking," providing more transportation choices, and reducing vehicular demand and associated emissions.

Based on the information above, the operational features of future commercial cannabis businesses would comply with approved plans for energy efficiency and renewable energy and, therefore, impacts would be *less than significant*.

3.2.6 Cumulative Impacts

Electricity and Natural Gas

As stated above, the proposed Project would not result in direct impacts to electricity and natural gas consumption but does have the potential to result in indirect impacts associated with the development and operation of commercial cannabis businesses resulting from the Project.

All commercial cannabis businesses associated with the proposed Project would be required to comply with CALGreen Code, the LACC (including the County's Green Building Code), and the County's General Plan/LCP. Increases in both electricity and natural gas consumption would be negligible compared to county-wide demand projections. As such, cumulative projects would also be required to be consistent with applicable mandatory regulations set forth in the CALGreen Code and Title 24 state energy standards. Therefore, the proposed Project would not make a cumulatively considerable contribution to a significant cumulative impact involving the consumption of energy.

Transportation Fuels

As previously described, the proposed Project would result in the consumption of vehicle fuel as employees, distribution vehicles, lab testing vehicles, and customers would travel to and from any given licensed cannabis operation. However, any increases in the demand for fuel within the county are likely to negligibly affect transportation fuel supplies, which are considered at a statewide level of demand and supply. Given the foreseeable negligible increase in regional and statewide demand and use of vehicle fuels, the proposed Project is not anticipated to substantially constrain available supplies or result in the wasteful use of such resources. As such, the proposed Project would not make a cumulatively considerable contribution to a significant cumulative impact involving the consumption of energy.

3.2.7 Mitigation Measures

The proposed Project would result in less than significant impacts regarding energy. Therefore, no mitigation measures are required.

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3.3 GREENHOUSE GAS EMISSIONS

Environmental impacts may arise from atmospheric discharges of pollutants known to contribute to climate change. These greenhouse gases (GHG) are produced by sources involved in facility construction and operation. Sources of emissions involved in construction activities include heavy-duty off-road equipment and on-road vehicle trips. Operational emissions would be predominantly attributed to mobile source vehicle trips by employees and patrons, and additional emissions associated with facility maintenance and other energy and utility resources. A significant GHG emissions impact would occur if a project would generate GHG emissions of sufficient magnitude to conflict with reduction targets promulgated by state, regional, and/or local authorities. Implementation of the proposed Commercial Cannabis Business Licensing Program (Project) would not generate GHG emissions that would have a significant effect on the environment, nor would the Project conflict with any of the state, regional, and/or local regulations adopted to reduce GHG emissions.

This section analyzes the potential impacts associated with GHG emissions from the implementation of the Commercial Cannabis Business Licensing Program (Project). Given that the proposed Project consists of amendments to the Los Angeles County Code (LACC) to establish commercial cannabis activities as an allowable use within certain eligible zoning districts in the unincorporated county, the following analysis focuses on the indirect GHG-related impacts associated with the commercial cannabis activities that would result from the proposed Project.

A summary of the impacts related to GHG emissions identified in this Section is provided in Table 3.3-1.

Table 3.3-1. GHG Emissions Summary of Impacts

GHG Emission Impacts	Mitigation Measures	Impact Classification
Impact GHG-1. The proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and the proposed Project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.	None required	Less than significant
Cumulative Impacts	None required	Less than significant

3.3.1 Background

Greenhouse Gases

The natural process through which heat is retained in the Earth's troposphere is called the "greenhouse effect." The greenhouse effect traps heat in the troposphere through a three-fold process, summarized as follows: short-wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long-wave (i.e., thermal) radiation; and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. This "trapping" of the long-wave radiation emitted back toward the Earth is the underlying process of the greenhouse effect. The greenhouse effect provides a habitable climate on the planet, but large magnitudes of GHG emissions from anthropogenic sources since the Industrial Revolution have created an excess of these gases in the atmosphere.

GHGs are the result of both natural and human-influenced activities. Volcanic activity, forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooling are the primary sources of GHG emissions. Without human activity, the Earth would maintain an approximate, but varied, balance between the emission of GHGs into the atmosphere and the storage of GHGs in oceans and terrestrial ecosystems. Increased combustion of fossil fuels (e.g., gasoline, diesel, and coal) has contributed to a rapid increase in atmospheric levels of GHGs over the last 150 years.

GHG pollutants most prevalently generated by human activities that have the greatest quantifiable influence on climate include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Additionally, GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), black carbon (black carbon is the strongest light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass), and water vapor. Methodologies and regulations approved by the Intergovernmental Panel on Climate Change (IPCC), the U.S. Environmental Protection Agency (USEPA), and the California Air Resources Board (CARB) focus on CO_2, CH_4, N_2O, and chlorofluorocarbons (CFCs). CO_2 is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHGs are less abundant but have higher Global Warming Potential (GWP) than CO_2. CFCs have been banned in the U.S. and are artificially created, so these GHGs are not included in this analysis.

- CO_2. The production and absorption of CO_2 from human activities occurs through the burning of fossil fuels (e.g., oil, natural gas, and coal), solid waste, and wood products, and as a result of other chemical reactions, such as those required to manufacture cement. CO_2 is constantly being exchanged among the atmosphere, ocean, and land surface as it is both produced and absorbed by many microorganisms, plants, and animals. Since the Industrial Revolution began around 1750, human-related activities have increased CO_2 concentrations in the atmosphere by approximately 50 percent, primarily resulting from fossil fuel combustion and cement production (Lindsey and Miller 2025). Globally, the largest source of human-related CO_2 emissions is the

combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities (USEPA 2025b). CO_2 is sequestered (i.e., removed from the atmosphere) when it is absorbed by plants as part of the biological carbon cycle. Terrestrial sequestration can offset up to 1.5 billion tons of CO_2 per year globally through reforestation and improved land management; geological sequestration has the potential to offset 10 billion tons per year, depending on available reservoirs and technological advancements; and ocean sequestration can offer an even higher capacity but requires extensive studies to understand and mitigate other ecological risks (Milkias, n.d.)

- CH_4. CH_4 is emitted from a variety of both human-related and other sources. Anthropogenic sources of CH_4 include the production and transport of coal, natural gas, and oil, from livestock and other agricultural practices, and from the decay of organic waste in municipal solid waste landfills. It is estimated that up to 65 percent of global CH_4 emissions are related to human activities. Other sources of CH_4 include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and wildfires (USEPA 2025g).
- N_2O. Microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen, produce N_2O (Tecon and Or 2017). In addition to agricultural sources, some industrial processes (e.g., fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to the atmospheric load of N_2O. Concentrations of N_2O began to rise at the beginning of the Industrial Revolution, reaching 314 parts per billion (ppb) by 1998 (USEPA 2024a).

To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent of CO_2, denoted as carbon dioxide equivalent (CO_2e). CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the Global Warming Potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Table 3.3-2 shows the GWP for some of the most environmentally prevalent GHGs.

Table 3.3-2. Global Warming Potential for Various Greenhouse Gases

Pollutant	Lifetime (Years)	Global Warming Potential (20-Year)	Global Warming Potential (100-Year)
Carbon Dioxide (CO_2)	--	1	1
Methane (CH_4)	12	21	25
Nitrous Oxide (N_2O)	114	310	298
Nitrogen Trifluoride	740	Unknown	17,200
Sulfur Hexafluoride (SF_6)	3,200	23,900	22,800
Perfluorocarbons (PFCs)	2,600-50,000	6,500-9,200	7,390-12,200

Pollutant	Lifetime (Years)	Global Warming Potential (20-Year)	Global Warming Potential (100-Year)
Hydrofluorocarbons (HFCs)	1-270	140-11,700	124-14,800

Source: CARB 2025.

Effects of Global Climate Change

The primary effect of rising global concentrations of atmospheric GHG levels is a rise in the average global temperature of approximately 0.17 degrees Fahrenheit (°F) per decade since 1901. Since the late 1970s, however, the U.S. has warmed faster than the global rate (USEPA 2024b). Climate change modeling from the World Meteorological Organization (WMO) shows that further warming is likely to occur given the expected rise in global atmospheric GHG concentrations from innumerable sources of GHG emissions worldwide (including from economically developed and developing countries and deforestation), which would induce further changes in the global climate system during the current century (WMO 2025). Based on policies and actions in place as of November 2024, the global temperature increases estimates to reach a median of 36.86°F in 2100 (Burgueño Salas 2025).

Over the past decade, the scientific community has improved its predictive capabilities through an advanced understanding of the fundamental processes responsible for global climate change. However, many uncertainties remain in predictive models including: local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. As the study of climate change and climate science progresses our understanding of the effects of climate change become more accurate. Yet, due to the complexity of the Earth's climate system and the inability to precisely model it, the uncertainty surrounding climate change remains. Nevertheless, the IPCC stated that "observed increases in well-mixed GHG concentrations since around 1750 are unequivocally caused by human activities…[and] human influence has warmed the climate at a rate that is unprecedented in at least the last 2,000 years." (IPCC 2021). Thousands of studies conducted by tens of thousands of scientists around the world have documented changes in the climate, with many lines of evidence demonstrating that human activities, especially GHGs, are the primary cause (U.S. Global Change Research Program 2017).

According to California's Fourth Climate Change Assessment (California Natural Resources Agency [CRNA] 2018) adverse effects from global climate change in California could:

- By 2050, increase intensity and frequency of heat waves, causing two to three times more heat-related deaths in cities.
- By 2100, increase average annual maximum daily temperature by 5.6°F to 8.8°F.
- By 2100, cause declines in the average water supply from snowpack by two-thirds from historic levels.

- By 2100, increase the frequency of extreme wildfires and increase the average area burned statewide by 77 percent.
- By 2100, erode 31 to 67 percent of Southern California beaches, increasing the risk of tidal inundation and coastal flood hazards.

Below is a summary of some of the potential effects that could be experienced in California and particularly within the Central Coast region as a result of global warming and climate change. Other types of environmental impacts related to air pollutant emissions are addressed in Section 3.1, *Air Quality*.

Air Quality and Heat-Related Public Health Impacts

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone (O_3), but the magnitude of the effect and, therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State (Sommerfeldt 2016). However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

The California Energy Commission's Cal-Adapt website, an outcome of California's first Climate Adaptation Strategy, provides climate change scenarios and impacts beneficial to local decision-makers. The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios and is comprised of the average values (i.e., temperature, sea level rise, and snowpack) from a variety of scenarios and models meant to illustrate how the climate may change based on a variety of different potential social and economic factors.

As reported by Cal-Adapt, the County of Los Angeles has the potential of an average increase in temperature of approximately 5.2 °F to 8.4 °F by 2070–2099, compared to the baseline 1961–1990 period (73.3 °F). This would result in a potential increase of approximately 7 to 12 percent. Data suggests that the predicted future increase in temperatures from climate change could potentially interfere with efforts to control and reduce ground-level ozone in the region (Cal-Adapt 2025).

Water Supply

Uncertainty remains concerning the overall impact of global climate change on future water supplies in California. Studies have found that "[c]onsiderable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change" (Kiparsky and Gleick 2003). For example, some studies identify little change in total annual precipitation in projections for California while others

show significantly more precipitation. Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, a reduced snowpack coupled with increased rainfall during winters could lead to reductions in spring season runoff and higher evapotranspiration because higher temperatures could reduce the amount of water available for recharge.

These effects of climate change may also have adverse effects on water quality. Changes in precipitation and runoff entering waterbodies and more frequent flooding can exacerbate many forms of water pollution, including increases in erosion and discharge of sediments or increasing runoff carrying harmful pollutants. Increases in water temperatures may also cause eutrophication and excess algal growth, as well as make it more difficult to attain water quality standards. These effects would impact natural processes, as well as the quality of much of California's water supplies (USEPA 2025d).

Hydrology and Sea Level Rise

Climate change could potentially affect the amount of snowfall, rainfall, and snowpack, and the intensity and frequency of storms. As a result, climate change could lead to adverse flood hydrographs (e.g., flash floods, rain or snow events, and coincidental high tide and high runoff events), sea level rise and coastal flooding, coastal erosion, and the potential for saltwater intrusion. Sea level rise can be a product of global warming through two main processes, including the expansion of seawater as the oceans warm and the melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood control facilities, including levees and coastal armoring, to handle storm events. Along the county's coastline, sea levels are projected to increase by 5.16 inches by 2030, 22.8 inches by 2060, and 76.8 inches by 2100, increasing coastal flooding and dune and bluff erosion, which threatens many coastal communities and infrastructure (National Oceanic and Atmospheric Administration [NOAA] 2025).

Agriculture

California has an approximately $60-billion agricultural industry that produces approximately three-quarters of the country's fruits and over a third of the country's vegetables (California Department of Food and Agriculture 2024). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year for certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Changes in the climate can affect terrestrial, coastal, and marine ecosystems by altering the hydrologic cycle and water quality, reducing the range of habitats, altering animal behavior and migration patterns, and altering the timing of natural processes such as flower blooms (USEPA 2025c). Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage. Recent studies have found that in California, 16 of 29 vegetation communities are highly or nearly highly vulnerable to climate change (California Natural Resources Agency [CNRA] 2018). The county's landscapes and ecosystems span islands, mountains, deserts, beaches, and coastlines. The region is home to many of the threatened and endangered plants and animals in the continental U.S. (approximately 4,000 species), and it is the most urbanized area to be designated one of Conservation International's global Biodiversity Hotspots (Los Angeles County Chief Sustainability Office 2025).

3.3.2 Existing Setting

Existing GHG Emissions from Human Activity

The burning of fossil fuels, such as coal and oil, especially for the generation of electricity and powering of motor vehicles, has led to substantial increases in CO_2 emissions (and thus substantial increases in atmospheric concentrations). In 2022, atmospheric CO_2 concentrations measured 421 parts per million (ppm) at NOAA's Mauna Loa Atmospheric Baseline Observatory in Hawaii, representing an increase from the level of 280 ppm that occurred for 6,000 years of human civilization before the Industrial Revolution (NOAA 2022).

Global GHG Emissions

The IPCC was formed by the World Meteorological Organization in 1988 to provide governments at all levels with scientific information that they can use to develop climate policies. The IPCC is the United Nation's body for assessing the science related to climate change and is responsible for tracking and reporting global emissions of GHGs. IPCC's Sixth Assessment Report, which was published in 2023, reported that global net anthropogenic GHG emissions were 59 ± 6.6 gigatons (Gt) CO_2e in 2019, approximately 12 percent (6.5 Gt CO_2e) higher than in 2010 and approximately 54 percent (21 Gt CO_2e) higher than in 1990 (IPCC 2023). The annual average during the decade 2010-2019 was 56 ± 6.0 Gt CO_2e, or 9.1 Gt CO_2e per year higher than in 2000–2009. This is the highest increase in average decadal emissions on record. The average annual rate of growth slowed from 2.1 percent per year between 2000 and 2009 to 1.3 percent per year between 2010 and 2019. Almost half (i.e., approximately 42 percent) of cumulative anthropogenic CO_2 emissions between 1850 and 2019 have occurred in the last 30 years (IPCC 2023).

Global temperatures in 2024 were recorded as 2.3°F above the 20th-century baseline (1951-1980), which tops the record set in 2023. Scientists have concluded the warming trend of recent decades is driven by heat-trapping carbon dioxide, methane, and other GHGs. In 2022 and 2023, Earth saw record increases in CO_2 emissions from fossil fuels, according to a recent international analysis. The concentration of CO_2 in the atmosphere has increased from pre-industrial levels in the 18th century of approximately 278 ppm to 420 ppm today (Vlock and Jacobs 2025) (Vlock & Jacobs, 2025).

U.S. GHG Emissions

In 2020, the total gross U.S. GHG emissions were 6,340.2 million metric tons (MMT) of CO_2e. Total U.S. emissions have decreased by 2.3 percent from 1990 to 2021, down from a high of 15.8 percent above 1990 levels in 2007. Emissions decreased from 2020 to 2021 by 5.2 percent (314.3 MMT CO_2e). From 2019 to 2020, there was a sharp decline in emissions, which is largely due to the impacts of the COVID-19 Pandemic on travel and economic activity. However, the decline also reflects the combined impacts of long-term trends in many factors, including population, economic growth, energy markets, technological changes, energy efficiency, and the carbon intensity of energy fuel choices. Following this decrease, travel and economic activity began to increase again, and in 2021, CO_2 emissions from fossil fuel combustion increased by 6.8 percent from the previous year. Emissions from the energy and transportation sectors, associated with increases in consumption of natural gas, coal, and petroleum also increased. In 2021 overall, CO_2 emissions from fossil fuel combustion were 1.9 percent below 1990 levels (USEPA 2023). In 2022, the total U.S. GHG emissions by sector were 28.0 percent for the transportation sector, 25 percent for the electric power sector, 23 percent for industry, 13 percent for residential and commercial sectors, and 10.0 percent for agriculture (USEPA 2023).

State of California GHG Emissions

Within their latest report, *California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators* (2024), CARB summarizes and highlights the major annual changes and notable longer-term trends of each year's GHG inventory. Notable highlights include the following:

In 2022, California generated approximately 371.1 MMT CO_2e, or approximately 6 percent of total U.S. emissions (CARB 2024). Despite a population increase of 17 percent between 2000 and 2022, the gross per capita emissions in the state were reduced by 24 percent from 13.8 metric tons (MT) CO_2e per person in 2001 to 5.08 MT CO_2e per person in 2022, an approximately 44.1 percent decrease (Ritchie and Roser 2023). This reduction indicates the contributions that energy conservation and energy efficiency have in reducing per capita emissions. Another factor that has reduced California's fuel use and GHG emissions is its mild climate compared to that of many other states.

Transportation is the source of approximately 37.7 percent of the state's GHG emissions, followed by industrial sources at 19.6 percent, and electricity generation – both in-state and

out-of-state – at 16.1 percent. Residential and commercial sources account for 10.6 percent, combined, while agriculture accounts for 8 percent. High GWP, such as refrigerants, comprised 5.7 percent of California's GHG emissions in 2022. Waste accounted for approximately 2.2 percent of state emissions (CARB 2024).

Table 3.3-3. California Greenhouse Gas Emissions Inventory

Source	CO_2e Emissions (Million Metric Tons)					
	2017	2018	2019	2020	2021	2022
Transportation	166.4	165.2	162.3	135.6	145.6	139.9
Electric Power	64.4	65.0	60.2	59.5	62.4	59.8
Industrial	81.4	82.0	80.8	73.3	73.9	72.7
Commercial & Residential	38.3	37.5	40.6	38.9	38.8	39.5
Agriculture	31.6	32.1	31.3	31.5	30.9	29.8
High GWP	20.1	20.5	20.7	21.3	21.3	21.3
Recycling & Waste	8.2	8.3	8.4	8.6	8.4	8.2
Emissions Total	410.4	410.7	404.4	368.7	381.3	371.2

Source: CARB 2024.

County of Los Angeles Emissions Inventory

Los Angeles County recently adopted the 2045 Climate Action Plan (CAP) that included an updated baseline inventory for the unincorporated areas in Los Angeles County for 2015, utilizing the inventory found in the OurCounty: The Los Angeles Countywide Sustainability Plan, but using the EMFAC (Emissions Factor) 2021 emission factors and an inventory for the year 2018, given the availability in that year of the most recent complete data set of emissions-generating activity. The 2015 and 2018 emission profiles developed for the 2045 CAP are shown in Table 3.3-4. As shown therein, the 2045 CAP estimates GHG emissions for the unincorporated county in 2018 to be approximately 5.17 million MT CO_2e, a decrease of approximately 7 percent since 2015. The greatest reductions in these emissions occur from the stationary energy sector (includes emissions from residential buildings, commercial and institutional buildings, and manufacturing and construction).

Table 3.3-4. Unincorporated Los Angeles County Greenhouse Gas Emissions Inventory

Source Category	2015 Annual GHG Emissions (MTCO2e)	Percent of Total*	2018 Annual GHG Emissions (MTCO2e)	Percent of Total*
Transportation	2,838,133	51	2,704,685	53
Stationary Energy	1,908,637	35	1,698,809	33
Waste	469,997	9	469,382	9
Industrial Processes	253,529	5	239,505	5

Source Category	2015 Annual GHG Emissions (MTCO2e)	Percent of Total*	2018 Annual GHG Emissions (MTCO2e)	Percent of Total*
Agricultural and Forestry	60,860	1	60,860	1
Total	5,531,155	100	5,173,240	100

Source: County of Los Angeles Department of Regional Planning 2024
Notes: * Percentages do not add up to 100 percent due to rounding.

3.3.3 Regulatory Setting

Global climate change is addressed through the efforts of various federal, state, regional, and local governmental agencies, as well as national and international scientific and governmental conventions and programs. These agencies work jointly and individually to understand and regulate the effects of GHG emissions and resulting climate change through legislation, regulations, planning, policymaking, education, and a variety of additional programs. Federal, state, and local laws and regulations have been enacted that address GHG emissions and the consequences of climate change. The USEPA is responsible for implementing federal policy to address GHG emissions, and the CARB has jurisdictional authority at the state level.

Federal Regulations

The federal government administers a wide array of public-private partnerships to reduce GHG intensity generated in the United States. Those programs focus on energy efficiency, renewable energy, methane and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. The USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the Energy Star labeling system for energy-efficient products) encourage voluntary endeavors by large corporations, consumers, industrial and commercial buildings, and many major industrial sectors to enhance energy efficiency and lessen GHG emissions.

Federal Clean Air Act

The Federal Clean Air Act (CAA) was passed in 1963, was amended in 1990, and was the first comprehensive federal law to regulate air emissions from stationary and mobile sources. Among other things, the law authorizes the USEPA to establish National Ambient Air Quality Standards (NAAQS), which help to ensure basic health and environmental protection from air pollution. The federal CAA also gives the USEPA the authority to limit emissions of air pollutants coming from sources like chemical plants, utilities, and steel mills.

In April 2007, the U.S. Supreme Court ruled that GHGs are "air pollutants" under the federal CAA. On December 7, 2009, two distinct findings regarding GHGs were adopted as Section 202(a) of the federal CAA. These include the “Endangerment Finding” and the “Cause or Contribution Finding.” The Endangerment Finding states that the current and projected concentrations of the six key well-mixed GHGs in the atmosphere threaten the public

health and welfare of current and future generations. The Cause and Contribution Finding states that the combined emissions of these well-mixed GHGs from new motor vehicles and vehicle engines contribute to the GHG pollution that threatens public health and welfare.

In 1990, the U.S. Congress adopted the federal CAA Amendments (CAAA), which updated the nation's air pollution control program. The Federal CAAA established several requirements, including new deadlines for achieving federal clean air standards.

The USEPA is the federal agency charged with administering the federal CAAA and other air quality-related legislation. As a regulatory agency, USEPA's principal functions include setting NAAQS; establishing minimum national emission limits for major sources of pollution; and promulgating regulations.

The federal CAAA requires USEPA to approve state implementation plans (SIPs) to meet and/or maintain the NAAQS. California's SIP is comprised of plans developed at the regional or local level.

Energy Independence and Security Act

The Energy Independence and Security Act (EISA) of 2007 includes several key provisions that will increase energy efficiency and the availability of renewable energy, which will reduce GHG emissions as a result. The EISA facilitates the reduction of GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
- Achieving approximately 25 percent greater efficiency for light bulbs by phasing out old incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.
- While superseded by the 2019 USEPA and National Highway Traffic Safety Administration (NHTSA) actions described in Section 3.1, *Air Quality*, the EISA included: a) establishing a minimum average fuel economy of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by 2020; and b) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.
- Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

Vehicle Emission Standards

In 2009, a national policy was adopted for fuel efficiency and emissions standards in the U.S. auto industry, which applies to passenger cars and light-duty trucks for model years 2012 to 2016 (referred to as "the Pavley standards"). The standards surpass the prior Corporate Average Fuel Economy standards and require an average, minimum fuel economy standard of 35.5 mpg and maximum of 250 grams of CO_2 per mile by model year 2016, based on USEPA calculation methods. These standards were formally adopted on April 1, 2010.

In 2012, standards were adopted for model year 2017 to 2025 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve a minimum 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and maximum 163 grams of CO_2 per mile. According to the USEPA, a model year 2025 vehicle would emit approximately one-half of the GHG emissions from a model year 2010 vehicle.

On October 25, 2016, the USEPA established rules for a comprehensive Phase 2 Heavy-Duty National Program that established fuel consumption and CO_2 standards for each of the four regulatory categories of heavy-duty vehicles. The rule also included separate standards for the engines that power combustion tractors and vocational vehicles. These standards build upon the Phase 1 and Phase 2 standards for light-duty vehicles spanning model years 2012-2025.

On April 12, 2023, the USEPA announced new, more ambitious proposed standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027 (USEPA 2025e).

Greenhouse Gas Emissions Standards for Medium- and Heavy-Duty Vehicles

The USEPA and the NHTSA have adopted a series of standards for medium- and heavy-duty vehicles that would improve fuel efficiency, reduce carbon pollution, and mitigate climate change impacts.

In September 2011, Phase 1 of the program was adopted. This initial phase established the first fuel efficiency requirements for medium- and heavy-duty vehicles for vehicle model years 2014 to 2018.

In October 2016, Phase 2 was finalized for medium- and heavy-duty vehicle standards that would cover model years 2019 to 2021 for semi-trucks, large pickup trucks, vans, buses, and work trucks (USEPA 2025e).

In March 2024, Phase 3 was adopted to revise existing standards for heavy-duty vehicles in model year 2027 and establish new standards for model years 2028 to 2032. Phase 3 applies to heavy-duty vocational vehicles (e.g., delivery trucks, refuse haulers, public utility trucks, transit, and shuttles) and tractors (e.g., day cabs and sleeper cabs on tractor-trailer trucks) (USEPA 2025f).

State Regulations

California has adopted statewide legislation to address various aspects of climate change and GHG emissions. The Governor of California has also issued several Executive Orders (EO) related to the State's evolving climate change policy.

California Air Resources Board

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets California ambient air quality standards (CAAQS), compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. CARB is responsible for the control of vehicle emission sources, while the local air district is responsible for enforcing standards and regulating stationary sources.

As directed by Assembly Bill (AB) 32, CARB adopted the first Scoping Plan, which presented a set of actions designed to reduce overall GHG emissions in California. This initial Scoping Plan provided an economy-wide approach to reducing emissions and highlighted the value of combining carbon pricing with other complementary programs to meet California's 2030 and 2045 GHG emissions targets while ensuring progress in all sectors. Relative to transportation, the Scoping Plan included nine measures or recommended actions related to reducing vehicle miles traveled (VMT) and transportation-related GHGs through fuel and efficiency measures. These measures would be implemented statewide rather than on a project-by-project basis.

AB 32 requires CARB to update the Scoping Plan at least every 5 years. CARB released the First Update to the Climate Change Scoping Plan in May 2014 to provide information on the development of specific regulations and to adjust projections in consideration of the economic recession. The 2014 Update to the Scoping Plan presented an update on the program and its progress toward meeting the 2020 limit. It also identified the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In response to EO B-30-15 and Senate Bill (SB) 32, all state agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the Scoping Plan to reflect the 2030 target. The 2017 Update to the Climate Change Scoping Plan was approved by CARB on December 14, 2017 (CARB 2017). The 2017 Scoping Plan builds upon the framework established by the initial 2018 Scoping Plan and 2014 Update while identifying new, technologically feasible, and cost-effective strategies to ensure that the State meets its GHG reduction targets.

After the 2017 Scoping Plan, CARB adopted more aggressive SB 375 targets in 2018 to support its goals. These targets encourage Sustainable Communities Strategies (SCSs) designed to collectively achieve a 19 percent reduction in statewide per capita GHG

emissions from passenger vehicles by 2035, relative to 2005 levels . However, CARB recognized that additional state and local actions are needed to achieve the transportation system reductions necessary to meet adopted climate goals, which is approximately a 25 percent reduction in statewide per capita GHG emissions by 2035 relative to 2005.

In 2022, CARB released a 2022 Scoping Plan Update, which includes a discussion of the relationship between local government actions and achievement of the State's long-term GHG emissions reduction goals, and non-binding recommendations to support local governments in their efforts to reduce GHG emissions (CARB 2022). The 2022 Scoping Plan Update also lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279 (CARB 2022).

The 2022 update presents the scenario recommended by CARB staff out of four scenarios that were analyzed for achieving California's ambitious goals. The proposed scenario builds on existing programs for the deployment of clean fuels and technologies, and for the first time brings California's forests, wetlands, and agricultural lands into the process with the potential to leverage sustainable management to use these landscapes for carbon storage. The scenarios also reflect the need for additional methods of capturing CO_2 that include pulling it from the smokestacks of facilities, or drawing it out of the atmosphere, and then safely and permanently storing it. This update aims to more effectively integrate equity and environmental justice throughout, and to ensure that vulnerable communities are not disproportionately impacted by climate change. The Plan also incorporates five dozen recommendations from the AB 32 Environmental Justice Advisory Committee (CARB 2022).

The recommended scenario included in the 2022 Scoping Plan Update is intended to keep California on track to reach its 2030 GHG reduction target as well as achieve carbon neutrality by 2045. The recommended scenario includes:

- An identified path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- A technologically feasible, cost-effective path to achieve carbon neutrality by 2045 or earlier.
- Strategies for severing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth.
- Equity and protection of California's most impacted communities as a driving principle throughout the document with a focus on considerations such as affordability, air quality, and health benefits from a dramatic reduction in petroleum combustion.
- The contribution of natural and working lands (NWLs) to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Reduction of emissions from the industrial, energy, and transportation sectors by 80 percent below 1990 levels by 2050 in accordance with EO S-3-05.

- The need to deploy all viable tools to address the crisis that climate change presents based on the most up-to-date science, including carbon capture and sequestration as well as direct air capture.

California Legislation on Climate Change

Other recent California legislation related to GHG emissions and climate change includes the following:

- AB 1493 – Requires CARB to define standards for cars and light trucks manufactured after 2009 (Pavley regulation). Among other things, the bill directed CARB to adopt regulations that achieve the maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, beginning with the 2009 model year.
    - Upon adoption of subsequent federal GHG standards by the USEPA that preserved the benefits of the Pavley regulations, the Pavley regulations were revised to accept compliance with the federal standards as compliance with California's standards in the 2012 through 2016 model years. This is referred to as the "deemed to comply" option.
- EO S-3-05 – Announced GHG emission reduction targets.
- AB 32 (Global Warming Solutions Act of 2006) – Requires CARB to adopt regulations to evaluate statewide GHG emissions and then create a program and emission caps to limit statewide emissions to 1990 levels.
- EO S-01-07 – Requires a statewide goal to be established to reduce the carbon intensity of California's transportation fuels.
- SB 97 – Acknowledges that climate change analysis is to occur in conjunction with the California Environmental Quality Act (CEQA) process and that the Governor's Office of Planning and Research is responsible for developing CEQA Guidelines.
- SB 375 – Creates a process whereby local governments and other stakeholders work together within their region to achieve the reduction of GHG emissions.
- EO B-30-15 – Established a new interim statewide GHG emission reduction target.
- Climate Change Scoping Plan – Designed to reduce overall carbon emissions in California.
- CARB GHG Emission Inventory – Creates GHG emissions limits and requires an emissions inventory for the industries determined to be significant sources of GHG emissions.
- SB 32 – Extension of AB 32 requiring the state to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged).
- SB 100 and 350 – Supports the reduction of GHG emissions from the electricity sector by accelerating California's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015.
- SB 1020 – Revises the SB 100 standards by requiring the following percentage of retail sales of electricity to California end-use customers to come from eligible renewable energy resources and zero-carbon resources: 90 percent by December 31, 2035; 95% by December 31, 2040; and 100% by December 31, 2045.

- SB 1383 – Requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants.
- EO B-55-18 – Established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter.
- AB 1279 (California Climate Crisis Act) – Declares the policy of the state both to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. AB 1279 also requires the state to ensure that updates to the Scoping Plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California.
- California Code of Regulations (CCR), Title 20 – Establishes appliance efficiency regulations, which require appliance manufacturers to meet state and federal standards for energy and water efficiency. New appliances regulated under Title 20 include refrigerators and freezers, room air conditioners, room air conditioning heat pumps, lamps, battery charger systems, and others.
- CCR, Title 24 – Sets several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility.

California Green Building Standards Code (CALGreen Code) (Title 24, CCR, Part 6 and 11)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The 2022 California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective January 2023. The 2022 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting; and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers 90.1-2013 national standards (California Energy Commission [CEC] 2022). In September of 2024, the current 2025 Building Energy Efficiency Standards were adopted with an effective date of January 1, 2026. The 2025 Standards accommodate the new and more efficient technologies that are constantly under development and aid in California's progress toward 100 percent clean electricity and carbon neutrality (CEC 2024).

The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, became effective in 2023. The 2023 CALGreen Code establishes mandatory green building code requirements as well as voluntary measures (Tier 1 and Tier 2) for new buildings in California. The mandatory provisions in CALGreen will reduce the use of volatile organic compound (VOC) emitting materials, strengthen water efficiency conservation, increase construction waste recycling, and increase energy efficiency. Tier 1 and Tier 2 are intended to further encourage building practices that minimize the building's

impact on the environment and promote a more sustainable design. The new 2025 CALGreen Code further reduces GHG emissions, increases on-site renewable energy, encourages automation of loads to be flexible to save consumer money, and improves indoor air quality and public health (CEC 2024).

Regional and Local Regulations

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties. SCAG addresses regional topics related to transportation, the economy, community development, and the environment. SCAG develops plans pertaining to transportation, growth management, hazardous waste management, housing, and air quality.

SCAG prepares the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that supports the land use and transportation components of the Air Quality Management Plans, which provide some GHG-reduction co-benefits. The most recent RTP/SCS, also known as "Connect SoCal 2024," was approved by SCAG's Regional Council in April 2024, and provided a long-term vision of the regional transportation and land use goals, policies, objectives, strategies, and investments for the SCAG region while at the same time providing strategies to meet GHG emissions reduction and air quality conformity requirements. Connect SoCal 2024 divides the challenges facing the region into four main areas with further subdivision of issues including: (1) mobility; (2) communities; (3) environment; and (4) economy. Specifically, the Plan was developed to achieve targets for GHG emissions reductions, consistent with SB 375 and other regional goals. This includes a description of how the region can attain the GHG emission-reduction targets set by CARB by achieving a 19 percent reduction in GHG emissions by 2035 compared to the 2005 level (SCAG 2024).

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) has jurisdiction over a total area of 10,743 square miles, consisting of the South Coast Air Basin (SCAB) – which comprises 6,745 square miles, including Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties – and the Riverside County portion of the Salton Sea and Mojave Desert Air Basins.

The SCAQMD is tasked with preparing regional programs and policies designed to improve air quality within the SCAB, which are assessed and published in the form of the Air Quality Management Plan (AQMP). The AQMP is updated every four years to evaluate the effectiveness of the adopted programs and policies and to forecast attainment dates for nonattainment pollutants to support the State Implementation Plan based on measured regional air quality and anticipated implementation of new technologies and emissions reductions. The most recent publication is the 2022 AQMP. Additional information

regarding the 2022 AQMP and other emissions regulations which SCAQMD enforces can be found in Section 3.1, *Air Quality*.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds (SCAQMD 2008a). The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 $MTCO_2e$ per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency (SCAQMD 2008b). However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects).

The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance threshold for other jurisdictions (SCAQMD 2025). The Working Group discussed methodologies for determining project significance including categorical exemptions, consistency with regional GHG budgets in approved plans, a numerical threshold, performance standards, and emissions offsets. The SCAQMD Working Group recommended draft, tiered thresholds to meet reduction requirements from AB 32. Since the development of the draft, tiered thresholds, California passed SB 32 in order to reduce state GHG emissions to 40 percent below 1990 levels by 2030. These recommended thresholds are over a decade old and were not designed to meet the stricter 2030 reduction requirements; as a result, these thresholds are outdated and were not utilized in this analysis.

Antelope Valley Air Quality Management District

The Antelope Valley Air Quality Management District (AVAQMD) serves the Mojave Desert Air Basin within Los Angeles County. Covering about 1,300 square miles, the AVAQMD includes air quality management for nearly two dozen unincorporated communities in the County's 5th Supervisorial District and the municipalities of Palmdale and Lancaster. The AVAQMD operates monitoring stations in the Antelope Valley, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections.

The AVAQMD is part of the Western Mojave Desert nonattainment area, which was designated as nonattainment by the USEPA in October 2015. In response to its "severe" nonattainment status the AVAQMD had issued ozone attainment plans. The most updated plan—AVAQMD Federal 70 ppb Ozone Attainment Plan—published in January 2023: (1) demonstrates that the AVAQMD will meet the primary required federal ozone planning milestone, attainment of the 70 ppb 8-hour ozone NAAQS, by August 2033; (2) presents the progress the AVAQMD will make towards meeting all required ozone planning milestones;

and (3) discusses the 2015 70 ppb 8-hour ozone NAAQS, preparatory to an expected non-attainment designation for the new NAAQS. Additional information regarding AVAQMD rules to manage and improve air quality is provided in Section 3.1, *Air Quality*.

Los Angeles County Green Building Standards

In April 2016, the County amended the County Code to include Title 31, Green Building Standards Code. The Green Building Standards Code incorporates by reference standards from the CALGreen Code and supersedes the green building ordinance and the drought tolerant landscaping ordinance in Title 22 of the County Code. The Green Building Standards Code includes mandatory residential and non-residential measures related to low impact development, electric vehicle charging infrastructure, cool roof installations, and construction waste management practices (County Code Title 31, Chapter 4 and Chapter 5).

Los Angeles County 2035 General Plan

Adopted in 2015, the Los Angeles County 2035 General Plan guides the long-term physical development and conservation of unincorporated areas through a framework of goals, policies, and implementation programs. It also serves as an advisory document to coordinate land use planning, public service and facilities planning, circulation and transportation planning, and environmental management initiatives. The Plan includes various policies related to GHG emissions and climate change. The 2035 General Plan includes the following elements and policies that pertain to the analysis of GHG-related impacts.

Air Quality (AQ) Element

- Policy AQ 1.2. Encourage the use of low or no VOC emitting materials.
- Policy AQ 2.10. Encourage the use of zero-emission and near-zero-emission construction, agriculture, and manufacturing equipment and freight decarbonization technologies, such as charging infrastructure for freight vehicles.
- Policy AQ 3.2. Reduce energy consumption in existing buildings and County operations through energy efficiency retrofits.
- Policy AQ 3.5. Phase in the decarbonization of existing and new development

Conservation and Natural Resources (C/NR) Element

- Policy C/NR 12.1. Encourage the production and use of renewable energy resources
- Policy C/NR 12.2. Encourage the effective management of energy resources, such as ensuring adequate reserves to meet peak demands.
- Policy C/NR12.3. Encourage distributed systems that use existing infrastructure and reduce environmental impacts.

OurCounty: Los Angeles Countywide Sustainability Plan

Adopted by the County Board of Supervisors in August 2019, the OurCounty: The Los Angeles Countywide Sustainability Plan is a shared vision for how local governments and stakeholders can protect the environment, improve economic opportunity, and advance equity within the unincorporated area. The OurCounty: The Los Angeles Countywide Sustainability Plan sets forth the following goals, strategies, targets, and actions that pertain to this analysis of GHG-related environmental impacts.

- Goal 1. Resilient and healthy community environments where residents thrive in place.
  - Strategy 1A. Minimize the exposure of vulnerable populations to pollution and reduce health disparities. Countywide targets include decreasing average on-road diesel particulate matter emissions to 80 percent below 2017 levels by 2025 and 100 percent below 2017 levels by 2035.
- Goal 2. Buildings and infrastructure that support human health and resilience
  - Strategy 2B. Require sustainable and healthy building design and construction. Actions include adopting CALGreen Tier 1 green building standards and identifying which Tier 2 standards could be adopted as code amendments (Action 31).
- Goal 7. A fossil fuel-free LA County
  - Strategy 7A. Transition to a zero-carbon energy system that reduces air and climate pollution and that minimizes the dangers of a changing climate to our communities and economy. Targets include the following:
    - Countywide targets of achieving carbon neutrality by 2050, with interim targets of 35 percent reduction in total greenhouse gas emissions by 2025 and 50 percent reduction in total greenhouse gas emissions by 2035.
    - Countywide targets of new distribution energy resources, including 3 gigawatts (GW) by 2025, 6 GW by 2035, and 10 GW by 2045.
    - All unincorporated areas to be powered by 100 percent renewable energy by 2025.

2045 Los Angeles County Climate Action Plan (2045 CAP)

The Los Angeles County 2045 CAP is a series of strategies, measures, and actions to mitigate the unincorporated areas' GHG emissions. The 2045 CAP aligns with the County's commitments to the 2016 Paris Climate Agreement and the We Are Still In Declaration (published in June 2017), which pledges the County to adapting its programs and services to reduce GHG emissions and help limit global temperature increases (U.S. Green Chamber of Commerce n.d.). The 2045 CAP establishes two GHG emission reduction targets and one long-term goal:

- By 2030, reduce GHG emissions by 40 percent below 2015 levels.
- By 2035, reduce GHG emissions by 50 percent below 2015 levels.
- By 2045, achieve carbon neutrality in unincorporated Los Angeles County.

In addition, Chapter 3 of the 2045 CAP establishes the GHG emissions framework for five categories: energy supply; transportation; building energy and water; waste; and agriculture, forestry, and other land uses. Strategies that are relevant to this analysis of GHG-related environmental impacts include the following:

- Energy Supply: Decarbonize the energy supply.
- Building Energy and Water: Decarbonize buildings; improve efficiency of existing buildings energy use; conserve water.
- Waste: Minimize waste, particularly organic waste, which can be addressed through source reduction, composting, and waste conversion technologies.

3.3.4 Impact Assessment Methodology

Significance Thresholds

For the purposes of this analysis and according to Appendix G of the CEQA Guidelines, the proposed Project would have a potentially significant effect related to GHG emissions if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Methodology

This analysis of potential GHG impacts reviews the existing GHG emissions described in Section 3.3.2, *Existing Setting*, and determines the potential impacts of the proposed Project regarding GHG emissions, consistent with the analysis in Section 3.1, *Air Quality*, and Section 3.2, *Energy*. As described in Chapter 2, *Project Description,* the proposed Project consists of the adoption of amendments to the LACC and other planning documents that govern development, to allow commercial cannabis activities within certain eligible zoning districts in the unincorporated county. The proposed Project would not generate direct impacts to GHG emissions associated with new physical development. However, the proposed Project would allow new uses within eligible zoning districts and associated short-term construction and operations could produce new GHG emissions.

As stated above, GHG emissions and climate change were evaluated in accordance with Appendix G of the CEQA Guidelines. CEQA Guidelines § 15064.4 provides:

In determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes.

For GHG emissions and global warming, there currently is not an established or universally agreed-upon quantified threshold of significance for GHG impacts. Moreover, SCAG, CARB, the County, SCAQMD, and AVAQMD do not have adopted quantitative project-level significance thresholds for GHG emissions that apply to the proposed Project. However, despite the absence of clearly defined thresholds for GHG emissions, the CEQA Guidelines § 15064.4 provides guidance to lead agencies for determining the significance of impacts from GHG emissions. CEQA Guidelines § 15064.4(a) provides that a lead agency shall have the discretion to determine, in the context of a particular project, whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model methodology to use; and/or (2) rely on qualitative analysis or performance-based standards.

For the purposes of presenting an analysis of potential GHG emissions from future cannabis operations enabled under the proposed Project against adopted thresholds from the SCAQMD and AVAQMD, quantitative methods, including data from the CEC and the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.29, were utilized to establish small-scale, independent emissions scenarios for each allowable cannabis business type, excluding distribution and microbusiness operations.[1,2] Despite the requirement that the proposed Project would limit commercial cannabis activities to existing structures, it cannot be determined with certainty the specific locations, sizes, and operations that would result from the proposed Project. Consequently, detailed modeling of air emissions resulting from the operation of future commercial cannabis activities resulting from the proposed Project would be speculative. Moreover, as stated above, there is no established or adopted quantitative threshold that is directly applicable to the proposed Project that could be used to determine the significance of impacts.

Therefore, given these limitations to the use of CalEEMod to generate quantitative data to analyze the GHG-related impacts associated with the proposed Project, this analysis also includes a qualitative comparison to applicable GHG reduction plans, policies, and/or regulations. Applicable regulatory frameworks include SCAG's Connect SoCal 2024, CARB's 2022 Climate Change Scoping Plan Update, the California and Los Angeles County Green Building Standards Code, and the County's General Plan.

[1] Cannabis distribution includes the procurement, sale, and transport of cannabis and cannabis products between licensed businesses. Distribution in this context emulates the same emissions scenario as retail operations and, therefore, was not independently analyzed.

[2] Based on the Project description, microbusinesses consist of at least three small-scale cannabis business types, and there is no limit to the number of cannabis microbusiness licenses that would be allowed within unincorporated areas of the county. However, each use included in a microbusiness would count toward the use's respective cap on licenses in the applicable unincorporated area. Because of this, there is no way to accurately predict which business types would make up each microbusiness or how many microbusiness licenses would be approved. Therefore, creating a hypothetical scenario for the purpose of estimating GHG emissions using CalEEMod would be overly speculative. Instead, a conservative estimate can be identified by adding together the emissions estimates from the three highest emitting cannabis business types, using CalEEMod.

Construction GHG Emissions

As stated above, the proposed Project would not generate direct, short-term construction impacts associated with GHG emissions as the proposed Project consists of the adoption of amendments to the LACC, rather than the implementation of a specific, physical development project. The specific type and level of redevelopment required to establish a commercial cannabis business will vary depending on the specific characteristics of a site. Therefore, insufficient information exists to use CalEEMod to model GHG emissions for construction activities that would result from the proposed Project.

Operational GHG Emissions

GHG emissions generated from the operation of various commercial cannabis activities were estimated independently using CalEEMod and summarized in Table 3.3-5. Operational emissions were not estimated for distribution and microbusiness operations.[3] Operation of the proposed Project would generate GHG emissions from on-site operations such as electricity use, demand for potable and recycled water supplies, disposal of solid waste, and the use of consumer products. GHG emissions also would result from vehicle trips generated by the proposed Project.

Depending on the type of development project being simulated, CalEEMod will include standardized default data for each land use and sub-land use category. Emissions for each allowed cannabis business type were calculated based on the most likely worst-case and unmitigated scenario (see Chapter 3, *Environmental Impact Analysis*). The year 2026 was utilized as the estimated start of operation and, therefore, all GHG emission factors utilized forecasted future (2026) carbon intensities to reflect specific planning considerations, including future integration of renewables.

CalEEMod requires locations to be chosen for each emissions scenario. For the purposes of each scenario, the operation or facility location was chosen based on parcel eligibility (i.e., within unincorporated areas, on developed land, and within an eligible zone). Each CalEEMod simulation calculated emissions for a single operation or facility and did not consider aspects of the chosen surrounding parcel's existing landscape features. More details about location, zoning district eligibility, and land use type can be found in Chapter 2, *Project Description*.

Table 3.3-5 GHG Emissions Estimates for Allowed Cannabis Types

Cannabis Business Type Model (Single Facility/Operation)	Annual Unmitigated Operation GHG Emissions (MT/yr)			
	CO_2	CH_4	N_2O	CO_2e
Testing	16.004	0.0176	0.0009	16.728
Manufacturing	10.175	0.0192	0.0004	10.841

[3] See footnotes 1 and 2, above.

Cannabis Business Type Model (Single Facility/Operation)	Annual Unmitigated Operation GHG Emissions (MT/yr)			
	CO_2	CH_4	N_2O	CO_2e
Retail	50.574	0.0148	0.0019	51.591
Cultivation	867.52	0.4413	0.0143	882.84
Annual Totals:	944.273	0.4929	0.0175	961.98

3.3.5 Environmental Impacts Analysis

GHG-1: The proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

As previously discussed, the proposed Project would not result in direct impacts associated with GHG emissions, but rather indirect impacts associated with a limited amount of redevelopment (e.g., interior remodels of buildings, and installation of signage and lighting) associated with the establishment of a commercial cannabis business on an existing, developed lot, as well as the operation of the commercial cannabis business. Sources of GHG emissions would generally include construction worker vehicles and equipment. For redevelopment on existing, developed lots, construction would occur over a limited period of time. Overall, any development or redevelopment associated with a potential cannabis business, or upgrades to comply with the LACC, would be spread throughout and across the Project area and would result in a negligible amount of GHGs when compared to county-wide GHG emissions.[4]

Operation of commercial cannabis businesses would generate GHG emissions from employee and customer vehicle trips, energy sources such as electricity demand and natural gas combustion, water conveyance and distribution, wastewater treatment, and solid waste decomposition. As described further in Chapter 3, *Environmental Impact Analysis*, the specific locations, sizes of buildings to be occupied, and other important characteristics of individual commercial cannabis businesses are unknown; therefore, a holistic, quantitative analysis of operational emissions resulting from the proposed Project would be speculative and potentially inaccurate and misleading. Instead, this analysis utilizes data derived from CalEEMod to estimate GHG emissions generated by future operation of typical commercial cannabis activities that may result from the proposed Project, as summarized in Table 3.3-5. As stated above, there is not an established or universally agreed-upon quantitative threshold of significance for GHG impacts and, on a regional and local level, there is not an adopted, quantitative, and project-level significance threshold for GHG emissions that applies to the proposed Project. SCAQMD's 2008 draft GHG significance thresholds state

[4] As stated in Table 3.3.-3, Unincorporated Los Angeles County Greenhouse Gas Emissions Inventory, in 2018 GHG emissions for the unincorporated areas of Los Angeles County totaled to 5,173,240 MMT CO_2e. This data is the most recent evaluation of total GHG emissions from unincorporated Los Angeles County.

that commercial or residential projects that emit fewer than 3,000 MT CO_2e per year would be assumed to have a less than significant impact regarding climate change. However, SCAQMD has not adopted this threshold and the threshold does not consider the more recently developed reduction requirements that SB 32 established. Regardless, as shown in Table 3.3-5, CalEEMod estimates of operational emissions of GHGs for each commercial cannabis business type would be substantially less than SQAMD's draft GHG significance threshold of 3,000 MT CO_2e/year.

However, all commercial cannabis businesses resulting from the proposed Project would be required to comply with applicable USEPA, CARB, SCAQMD, and AVAQMD emissions standards, rules, and regulations, as well as State licensing energy efficiency requirements. For example, indoor cultivation licensees would be required to limit electricity usage so that it does not exceed the average electricity GHG emissions intensity required by their local utility provider (e.g., Southern California Edison [SCE]) pursuant to the California Renewables Portfolio Standard Program of the Public Utilities Code (Title 4, Division 19, Chapter 7, Article 2, § 16305(a), Renewable Energy Requirements). If the licensed cultivator's average weighted GHG emission intensity is greater than the local utility provider's GHG emission intensity, the licensee would be required to obtain carbon offsets to cover the excess in carbon emissions from the previous annual licensed period (Ibid, § 16305(b), Renewable Energy Requirements).

Additionally, the proposed Project would not cause a significant environmental impact due to a conflict with GHG reduction measures (e.g., by delaying or interfering with achievement of the relevant reduction targets by their corresponding dates) set forth in SCAG's 2024-2050 RTP/SCS, CARB's 2022 Climate Change Scoping Plan Update, the California and Los Angeles Green Building Standards Code, and/or the County's General Plan. As stated above, the proposed Project is not a physical development project and new development that would indirectly result from the proposed Project would be limited (e.g., construction associated with remodels of existing buildings and the installation of accessory structures like signage). Further, future commercial cannabis operations and/or facilities implemented as a result of the proposed Project are anticipated to emulate the average operational emissions for similarly zoned facilities that currently exist throughout the county. Therefore, the proposed Project does not have the potential to cause an exceedance of population and/or development – and the corresponding GHG – forecasts on which SCAG's 2024-2050 RTP/SCS, CARB's 2022 Climate Change Scoping Plan Update, and the County's General Plan are based.

Finally, as summarized in Chapter 2, *Project Description*, all future commercial cannabis operations would be subject to all applicable LACC regulations and General Plan policies. County cannabis business licenses and land use permits would only be issued to cannabis businesses proposed on sites that are zoned appropriately per LACC Title 22 and meet all County requirements, including locational, structural, and operational requirements. All licensed cannabis businesses also would be required to operate in compliance with the County and State cannabis licensing requirements that are designed to comply with

applicable State and County plans, policies, and regulations associated with GHG emissions. As such, the proposed Project would not interfere with any statewide or regional initiatives to reduce GHG emissions or conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions; impacts regarding GHG emissions would be *less than significant*.

3.3.6 Cumulative Impacts

The analysis of GHG emissions set forth above evaluates the impacts of the proposed Project in the context of global climate change, provides an analysis of the proposed Project's contribution of GHG emissions in addition to other sources, and, therefore, consists of a cumulative analysis of GHG-related impacts. Therefore, because the proposed Project would have a *less than significant* impact related to GHG emissions, it would not contribute a considerable significant impact related to GHG emissions.

3.3.7 Mitigation Measures

The proposed Project would result in *less than significant* impacts regarding GHGs. Therefore, no mitigation measures are required.

3.4 HAZARDS AND HAZARDOUS MATERIALS

The Commercial Cannabis Business Licensing Program (Project) involves the adoption of amendments to the Los Angeles County Code (LACC) that would allow, regulate, and monitor all cannabis businesses in unincorporated areas of the County. Under the proposed LACC Title 22 amendments, the routine use, storage, transport, and disposal of hazardous materials would be restricted to eligible industrial, commercial, commercial-only mixed-use, and institutional zones. All business types would be prohibited in residential, agricultural, open space, and other zones that have substantial numbers of sensitive receptors and/or characteristics that would exacerbate hazardous conditions. Commercial cannabis businesses would also be subject to setback requirements from sensitive land uses, such as youth-oriented facilities, to ensure adequate separation from potential sources of hazardous materials and to reduce the risk of exposure in the event of an accidental release. Additionally, all licensed cannabis businesses would be subject to existing environmental and hazardous material laws and programs, including, but not limited to, Department of Cannabis Control (DCC) regulations, Hazardous Materials Business Plan Act, and LACC Title 32 Fire Code. Therefore, the Project would result in less than significant impacts regarding hazards and hazardous materials.

This section evaluates potential impacts of the proposed Commercial Cannabis Business Licensing Program (Project) which are related to hazards and hazardous materials. There are various human- and non-human-made hazard-related impacts associated with the operation and location of a project, including the handling of hazardous materials, the release or emissions of hazardous materials into the environment, the potential interference with airport land use plans and emergency evacuation plans, and the exposure of people or structures to wildfire and preexisting hazardous sites.

Hazardous materials are defined as substances with physical and chemical properties of flammability, corrosivity, reactivity, or toxicity, which may pose a threat to human health or the environment. Examples of hazardous materials include petroleum products, solvents, pesticides, herbicides, paints, metals, asbestos, and other regulated materials. Additionally, the term "release" includes known historical spills, leaks, illegal dumping, or other discharges of hazardous materials to soil, sediment, groundwater, or surface water. Areas where historical releases of hazardous materials have occurred can pose a risk to public health and the environment.

Other types of hazards are addressed in other sections of this EIR as follows: air pollution hazards, such as toxic air contaminants (TACs) and particulate matter (PM), are addressed in Section 3.1, *Air Quality*; traffic safety hazards are addressed in Section 3.6, *Transportation and Traffic*; and hazardous solid waste disposal is addressed in Section 3.7, *Utilities/Service Systems*.

A summary of impacts related to hazards and hazardous materials identified in this Section is provided in Table 3.4-1.

Table 3.4-1. Hazards and Hazardous Materials Summary of Impacts

Hazards and Hazardous Materials	Mitigation Measures	Impact Classification
Impact HAZ-1. The proposed Project would not result in the creation of a significant hazard to the public or the environment due to the routine transport, use, or disposal of hazardous materials.	None required	Less than significant
Impact HAZ-2. The proposed Project would not 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.	None required	Less than significant
Impact HAZ-3. Although the proposed Project could result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and/or sensitive uses, compliance with existing regulations and new regulations that the proposed Project would impose on commercial cannabis businesses would prevent significant impacts associated with hazardous emissions, materials, substances, and/or wastes, to schools and/or sensitive uses..	None required	Less than significant
Impact HAZ-4. Although the proposed Project could result in the location of a commercial cannabis activity on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, compliance with existing regulations and new regulations that the proposed Project would impose on commercial cannabis businesses would prevent significant impacts associated with the creation of a significant hazard to the public or the environment.	None required	Less than significant
Impact HAZ-5. The proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.	None required	No impact
Impact HAZ-6. The proposed Project would not result in the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	None required	Less than significant

Hazards and Hazardous Materials	Mitigation Measures	Impact Classification
Impact HAZ-7. The proposed Project would not result in the creation of a potentially dangerous fire hazard.	None required	Less than significant
Cumulative Impacts	None required	Less than significant

3.4.1 Environmental Setting

Hazards and Hazardous Materials

Common Hazards and Hazardous Land Uses

As previously discussed, Los Angeles County consists of various land uses and operations throughout the unincorporated area that involve the handling, storage of, or exposure to, potentially hazardous materials that could adversely affect nearby communities, water supply, air quality, and public health. They can often be associated with commercial, industrial, and mixed-use development in urban and rural areas and can include materials such as cleaning and metal solvents, pesticides and herbicides, paints, oils, and lubricants. Further, other hazardous materials, such as asbestos or lead-based paints, can often be found in older buildings or used for certain operations, such as auto repair shops, gas stations, oil and mining facilities, commercial agricultural fields, medical offices, dry cleaners, and photo processing centers.

Commercial zones subject to the proposed Project generally include a variety of retail stores, restaurants, offices, and service-oriented businesses that support economic growth and provide amenities to the community. Businesses such as auto repair shops, medical offices, and dry cleaners each pose varying degrees of hazard risk.

Industrial zones subject to the proposed Project consist of a range of manufacturing activities. Light manufacturing often includes the assembly, distribution, and storage of goods that have low nuisance impacts; while heavy manufacturing zones allow for activities that often result in noise, vibration, odors, and other negative characteristics that warrant separating heavy manufacturing activities from residential and other uses involving sensitive receptors. Heavy manufacturing may consist of mineral extraction and refining, trucking terminals, and railroad and freight stations.

While not located within a specific land use area, there are numerous oil and gas extraction facilities throughout the county that can expose nearby communities to air pollution, odors, noise, vibration, bright lights, and potential chemical spills, fires, and explosions. According to the Los Angeles County Office of Oil and Gas Dashboard, the unincorporated area has 4,458 oil and gas wells, with 932 of them being active and 2,821 being plugged and abandoned (Los Angeles County Office of Oil and Gas 2025). Increasing use near active oil fields could potentially expose employees and customers to chemical hazards. Also, it is possible that oil wells abandoned in compliance with past or current regulatory agency

standards may begin leaking oil. All oil wells (abandoned, plugged, or active) located on land eligible for licensing of cannabis activities would be managed according to California Geologic Energy Management Division (CalGEM) procedures and requirements.

In addition, the County has 15 public-use airports within the boundaries of the Los Angeles County Airport Land Use Commission's (ALUC's) jurisdiction. Airports present potential hazards associated with aircraft movement, noise, safety, and other aviation incidents. The County's ALUC provides guidance on air transportation and compatible land uses around the airport.

Hazardous Materials Site Listing

In addition to generalized land uses and operations that may pose a hazard, there are known hazardous sites and incidents that require past and/or ongoing remediation efforts. These contamination sites may have been involved, or continue to be involved, in hazardous operations that utilize hazardous compounds, fuels, or explosive substances. Land uses that are particularly sensitive to the release of hazards or hazardous materials include residential, educational, assisted living, daycare, and agricultural areas.

California Government Code Section 65962.5 requires California Environmental Protection Agency (CalEPA) to compile, maintain, and update specified lists of hazardous material release sites. The California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21092.6) requires the Lead Agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project and any alternatives are identified on any of the following lists:

- U.S. Environmental Protection Agency (USEPA) National Priorities List: Lists all sites under the USEPA Superfund program, which was established to fund the cleanup of contaminated sites that pose risks to human health and the environment.
- USEPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and Archived Sites: The CERCLIS list contains 15,000 sites nationally identified as hazardous sites. This would also involve a review of archived sites that have been removed from CERCLIS due to "No Further Remedial Action Planned" status.
- USEPA Resource Conservation and Recovery Act Information System (RCRIS or RCRAInfo): RCRIS is a national inventory system for hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- Department of Toxic Substances Control (DTSC) Cortese List: The DTSC maintains the Hazardous Waste and Substances Sites (Cortese) List as a planning document for use by state and local agencies to comply with CEQA requirements regarding the provision of information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- DTSC HazNet: DTSC uses this database to track hazardous waste shipments.

- State Water Resources Control Board (SWRCB) Leaking Underground Storage Tank Information System (LUSTIS): The SWRCB maintains the LUSTIS that contains an inventory of underground storage tanks and leaking underground storage tanks and thereby tracks unauthorized releases.

The Cortese List consists of a comprehensive list of hazardous material release sites. It includes information resources contained on websites hosted by the boards or departments referenced in the statute, including the DTSC's online EnviroStor database and the SWRCB's online GeoTracker database. These two databases include hazardous material release sites, along with other categories of sites or facilities specific to each agency's jurisdiction.

A review of EnviroStor and Geotracker databases indicates a variety of hazardous sites within the county. Table 3.4-2 lists the type and number of known hazardous sites found in the county.

Table 3.4-2. Known Regulated Hazardous Sites within the County

Site/Facility Type	Definition	Number of Sites
Superfund Sites	Contaminated sites due to hazardous waste being dumped, left out in the open, or otherwise improperly managed, pursuant to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).	23
Leaking Underground Storage Tank (LUST) Cleanup Sites	All Underground Storage Tank (UST) sites that have had a leak or spill of a hazardous substance.	7,626
Cleanup Program Sites	Non-federal sites under SWRCB's Site Cleanup Program, which includes hazards related to pesticide and fertilizer facilities, industrial manufacturing and maintenance sites, dry cleaners, refineries, mine sites, and RCRA/CERCLA cleanups.	4,719
Military Sites	Cleanup sites on existing military bases or those to be transferred to civilian reuse.	15
Irrigated Lands Regulatory Program	All sites that discharge agricultural runoff.	1
Permitted UST Facilities	Underground Storage Tank sites that have been permitted and can be found in the California Environmental Reporting System (CERS) database.	3,858
	Total	16,242

National Hazardous Materials Route Registry

The Federal Motor Carrier Safety Administration has a National Hazardous Materials Route Registry (NHMRR) that identifies designated and restricted routes for transporting hazardous materials. The identified highways are the primary transportation routes through the county, which present a risk of possible spills of hazardous materials. Primary transportation routes in the county include, but are not limited to, Interstates 5, 405, 210, 10, and 605 and State Routes 60, 91, and 57.

Wildfire Hazards

Designated Fire Hazard Severity Zones

The California Department of Forestry and Fire Protection (CAL FIRE) maps areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. These maps identify fire hazard severity zones (FHSZs) and classify each zone as moderate, high, or very high. Further, the maps indicate Federal Responsibility Areas, where the federal government is financially responsible for fire suppression; State Responsibility Areas (SRAs), where the state is financially responsible for wildfire suppression; and Local Responsibility Areas (LRAs), where cities or counties have the primary financial responsibility for wildfire suppression. As of 2019, the unincorporated area of the county included 23.53 square miles (0.77 percent) of very high FHSZ in LRA[1]; 132.06 square miles (4.34 percent) of high FHSZ in SRA; and 610.94 square miles (20.09 percent) of very high FHSZ in SRA (Los Angeles County 2019).

Wildfire Environment

Fire behavior is primarily dependent upon topography, fuel, and weather. As described below, the combination of these three factors can facilitate or hinder the spread of wildfire.

Topography

Topography and slope steepness influence the speed and intensity of fire spread. Fires tend to move faster uphill due to rising heat and the preheating of upslope vegetation. In addition, south-facing slopes receive greater solar exposure, leading to drier fuel conditions and increased ignition potential. Conversely, mountain ridges often act as natural firebreaks, as fire typically slows when attempting to move downhill due to decreased preheating and fuel availability. Further, the areas where wildfire poses the greatest risk to people are located along the wildland-urban interface (WUI), or the location where urban development is adjacent to vegetation that can burn in a wildfire. The WUI is common where urban development meets mountainous or hillside areas.

[1] Only very high FHSZs are mapped in LRAs.

Nearly 47 percent of Los Angeles County consists of mountain ranges. These areas, commonly referred to as "fire corridors", include the Santa Monica Mountains, San Gabriel Mountains, Palos Verdes Hills, and Puente Hills (Los Angeles County 2019).

Fuel

Fuel refers to vegetation and plant matter that can ignite and sustain combustion during wildfire. Vegetative characteristics, including moisture content, density, management, and species type, play a major role in the occurrence or intensity of a fire spread. The amount of combustible material is referred to as "fuel load."

The county consists of various vegetation types that would influence the occurrence, intensity, or spread of wildfires. For example, very high FHSZs in the county typically contain chaparral ecosystems, which contain volatile and flammable oils, and are located within mountainous areas where steep terrain can fuel the spread of wildfires, as described above. Other vegetative fuels include coastal sage and riparian oak woodlands in the Santa Monica Mountains and Santa Clarita Valley, as well as juniper, Joshua tree, California scrub oak, creosote bush, and pinyon pine in the Antelope Valley (Los Angeles County Fire Department 2021b).

Weather

Weather conditions, such as temperature, humidity, wind, and precipitation, influence wildfire ignition potential, spread rate, and containment strategies. For example, high temperatures and low humidity reduce fuel moisture, which makes ignition more likely to occur. Additionally, wind may accelerate wildfire spread by supplying oxygen and directing wildfire movement. Wind can also carry embers over long distances, igniting spot fires.

The Los Angeles basin has a Mediterranean climate and experiences warm dry summers and mild wet winters. High moisture levels during the rainy season significantly increase the growth of plants. However, the vegetation is dried during the long, hot summers, decreasing plant moisture content and increasing the ratio of dead fuel to living fuel. As a result, fire susceptibility increases dramatically, particularly in late summer and early autumn.

The coastline in Los Angeles County experiences much cooler temperatures than inland areas, which can reach temperatures above 100 degrees Fahrenheit in the summer. The County experiences about 35 days of precipitation each year. In the autumn and winter months, high-pressure weather systems that develop over the Great Basin and Mojave Desert heat up air and produce strong offshore winds commonly known as Santa Ana winds. These are strong downslope winds that blow through the mountains, decrease relative air humidity and fuel moisture, and create conditions that can lead to the spread of high-severity wildland fires (Los Angeles County Fire Department 2021b).

Wildland Fire Management and Firefighting

Typical strategies for managing wildland fire hazards include: (1) ongoing fuel management; (2) fuel reduction near structures; and (3) fire suppression. Fuel management often includes

removing dried vegetation, creating fuel breaks, and conducting prescribed burns. Fuel reduction strategies, such as defensible spaces, fire-resistant landscaping, and fire-resistant construction can further protect life, property, and the environment.

The Los Angeles County Fire Department (LACoFD) provides fire and emergency medical services in the unincorporated areas of the County. LACoFD has 177 fire stations, 22 battalions, and multiple divisions, including Air and Wildland, Fire Prevention, Forestry, and Health Hazardous Materials (Los Angeles County Fire Department 2021a). LACoFD has a mutual aid agreement with the U.S. Forest Service (USFS) to suppress wildland fires that occur in and around Angeles National Forest; LACoFD has primary responsibility for fire suppression of structure fires, while USFS has primary responsibility for responding to non-structure fires. In the event of an emergency, both LACoFD and USFS would fight wildland and structure fires.

History of Wildfires

In recent years, Los Angeles County has experienced numerous large and destructive wildfires. Table 3.4-3 outlines several of the county's most notable wildfire events, based on factors such as total acreage burned, number of fatalities, and extent of property damage.

Table 3.4-3. Notable Wildfires in the County

Wildfire	Location	Acres Burned (Acres)	Structural Damage & Fatalities	Cause of Fire
Grand Prix Fire October 21, 2003	Between Claremont and Lytle Creek	50,618	136 homes destroyed.	Accidental but human-initiated
Simi Fire October 25, 2003	Between Simi Hills and southeastern Simi Valley	108,204	11 structures damaged and 315 structures destroyed.	Unknown
Day Fire October 30, 2006	Los Padres National Forest	1612,702	-	Human-initiated
Ranch Fire October 20, 2007	Near Townsend Peak in the Angeles National Forest	58,410	-	Equipment-initiated
Station Fire September 22, 2009	Angeles National Forest	160,577	89 residences and 120 additional buildings were destroyed. Two firefighters killed.	Arson
Woolsey Fire November 8, 2018	Los Angeles and Ventura counties, including Thousand Oaks,	96,949	364 structures damaged, 1,643 structures	Under investigation

Wildfire	Location	Acres Burned (Acres)	Structural Damage & Fatalities	Cause of Fire
	Agoura Hills, Calabasas, the Santa Monica Mountains, Malibu,		destroyed, and 3 people killed.	
Palisades Fire January 7, 2025	Santa Monica Mountains, Malibu, and the unincorporated community of Topanga	23,448	973 structures damaged, 6,837 structures destroyed, and 12 civilians killed.	Arson
Eaton Fire January 7, 2025	San Gabriel Mountains and the unincorporated community of Altadena	14,021	1,074 structures damaged, 9,414 structures destroyed, and 19 people killed.	Under investigation

Source: Los Angeles Regional Fire Safe Council 2025; CAL FIRE 2003; 2006; 2007; 2009; 2025c; 2025b; 2025a

Hazards Relating to Cannabis Activities

The cannabis industry involves various potentially hazardous activities, including manufacturing, testing, and distribution of cannabis.

Cannabis manufacturing involves both non-volatile and volatile extraction processes. Non-volatile extraction typically involves the use of low-risk solvents, such as alcohol or water, to dissolve tetrahydrocannabinol (THC) from the cannabis plant to produce an extract. Infused products are made from raw cannabis flower/leaves or prepared concentrate into different mediums to make new products, which do not pose a hazard risk. Volatile processes typically include or require equipment or substances that are volatile (i.e., flammable and explosive), such as compressed butane gas and other hydrocarbon compounds to produce THC extracts, typically in the form of butane hash oil (BHO) or carbon dioxide (CO_2) cannabinoid concentrates and oils. Although volatile cannabis manufacturing can be performed safely in compliance with all applicable safety and processing regulations, fires, explosions, and hazardous materials spills may occur from manufacturing operations. Such accidents can result in substantial harm to property and persons, both those involved in the process of cannabinoid extraction and others within the vicinity of an accident.

The distribution and testing of cannabis may also present hazards from the storage, use, and disposal of hazardous materials. Pursuant to the Medicinal and Adult Use Cannabis Regulation and Safety Act (MAUCRSA), testing of cannabis is currently conducted in laboratory settings in compliance with standards established by the Business and Professions Code. The testing of cannabis involves the regular use, transport, and disposal of hazardous materials such as chemicals, reagents, and solvents utilized for analytical testing of cannabis. However, such analytical testing does not tend to involve volatile

processes or substantially hazardous activities and is conducted in very controlled environments.

Further, as described in Section 3.6, *Transportation*, the transport of cannabis and cannabis products can result in increased hazards relating to traffic, such as increased vehicle trips, congestion, circulation hazards, and pedestrian and bicycle safety concerns.

3.4.2 Regulatory Setting

The hazards analysis was conducted in conformance with the goals and policies of federal, state, and local regulations, as described below.

Federal Regulations

Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The Federal Toxic Substances Control Act (1976) and RCRA established a USEPA-administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. In 1984, the Hazardous and Solid Waste Act (HSWA) amended the RCRA by affirming and extending the "cradle to grave" system of regulating hazardous wastes. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed. The DTSC is responsible for implementing the RCRA program and California's hazardous waste laws, collectively known as the "Hazardous Waste Control Law." Under the Certified Unified Program Agency (CUPA) program, CalEPA has delegated enforcement authority to the County for state law regulating hazardous waste producers or generators.

CERCLA/Superfund Amendments and Reauthorization Act

In 1980 the federal government enacted CERCLA, commonly known as "Superfund" (42 U.S. Code [USC] 103). This law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when a responsible party cannot be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP) (40 Code of Federal Regulations [CFR] Part 300). The NCP provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List (NPL). In 1986, the Superfund Amendments and Reauthorization Act (SARA) amended CERCLA. The amendments reauthorized CERCLA with specific changes to prioritize human health, increase citizen participation, explore innovative treatment methods, and provide new enforcement strategies. Further, Title II of SARA authorized the Emergency Planning and Community Right-to-Know Act (EPCRA) that mandates facilities

to report the presence, use, and release of hazardous materials to federal, state, and local governments.

Clean Water Act/Spill Prevention, Control, and Countermeasure Rule

The Clean Water Act (CWA) (33 USC 1251 et seq., formerly the Federal Water Pollution Control Act of 1972) was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of waters of the U.S. As part of the CWA, USEPA oversees and enforces the Oil Pollution Prevention regulation contained in 40 CFR Part 112, commonly known as the "SPCC Rule" because it requires facilities to prepare, amend, and implement spill prevention, control, and countermeasure (SPCC) plans. A facility is subject to SPCC regulations if a single oil storage tank has a capacity greater than 660 gallons, the total aboveground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons and, because of its location, the facility could reasonably be expected to discharge oil into or upon the "navigable waters" of the U.S.

Other federal regulations overseen by USEPA relevant to hazardous materials and environmental contamination include 40 CFR § 1(D) (Water Projects) and 40 CFR § 1(I) (Solid Wastes). Further, 40 CFR § 1(D)(116) sets forth a determination of the reportable quantity for each substance that has been designated as hazardous, and 40 CFR § 1(D)(117) applies to quantities of designated substances equal to or greater than the reportable quantities that may be discharged into waters of the U.S.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act of 1986 was created to help communities plan for emergencies involving hazardous substances. This law establishes requirements for federal, state, and local governments, Native American tribes, and industry regarding emergency planning and reporting on hazardous and toxic chemicals. There are four major provisions of the Emergency Planning and Community Right-to-Know Act: Emergency Planning (Sections 301 – 303); Emergency Release Notification (Section 304); Hazardous Chemical Storage Reporting (Sections 311 – 312); Toxic Chemical Release Inventory (Section 313); and the Clean Air Act Risk Management Plan Regulations (Clean Air Act Section 112[r]).

Occupational Safety and Health Administration

The mission of the Occupational Safety and Health Administration (OSHA) is to: ensure the safety and health of American workers by setting and enforcing standards; provide training, outreach, and education; establish partnerships; and encourage continual improvement in workplace safety and health. OSHA staff establishes and enforces protective standards and coordinates with employers and employees regarding technical assistance and consultation projects. OSHA standards are listed in 29 CFR Part 1910.

State Regulations

California Environmental Protection Agency

CalEPA was created in 1991. It unified California's environmental authority into a single cabinet-level agency and brought the following departments under one agency:

- California Air Resources Board (CARB)
- SWRCB
- Regional Water Quality Control Boards (RWQCBs)
- California Department of Resources, Recycling, and Recovery (CalRecycle)
- DTSC
- Office of Environmental Health Hazard Assessment (OEHHA)
- Department of Pesticide Regulation (DPR)

These agencies were placed within the CalEPA "umbrella" for the protection of human health and the environment to ensure a coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substances Control

DTSC, a department of CalEPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

The California Government Code Section 65962.5 includes DTSC-listed hazardous waste facilities and sites, Department of Health Services (DHS) lists of contaminated drinking water wells, sites listed by SWRCB as having UST leaks or discharges of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites with a known migration of hazardous waste/material (collectively, "Cortese List").

State Water Resources Control Board

SWRCB is responsible for statewide regulation of water resources. SWRCB's mission is to "ensure the highest reasonable quality for waters of the State, while allocating those waters to achieve the optimum balance of beneficial uses" (SWRCB 2025). SWRCB thus has joint authority over water allocation and water quality protection. SWRCB supports the efforts of the individual RWQCBs, of which there are nine statewide. These are semiautonomous and consist of board members who the Governor appoints and the Senate confirms. Regional boundaries are based on watershed, and water quality requirements are based on the unique differences in climate, topography, geology, and hydrology for each watershed.

Each RWQCB makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and taking enforcement actions. Water quality standards are defined in each RWQCB's Basin Plan, and every plan must comply with policies established by the SWRCB under the Porter-Cologne Water Quality Control Act (Porter-Cologne Act). The Porter-Cologne Act also provides that an RWQCB may include in its region a Regional Plan with water discharge prohibitions applicable to certain conditions, areas, or types of waste. The RWQCBs are also authorized to enforce discharge limitations, take actions to prevent violations of these limitations from occurring, and conduct investigations to determine the quality of any of the waters of the state within their region. Civil and criminal penalties are also applicable to persons who violate the requirement of the Porter-Cologne Act or SWRCB/RWQCB orders.

California Office of Emergency Services

To protect public health and safety as well as the environment, the California Office of Emergency Services (OES) is responsible for establishing and managing statewide standards for business and area plans related to the handling and release, or threatened release, of hazardous materials. OES requires basic information regarding hazardous materials handled, used, stored, or disposed (including location, type, quantity, and health risks) to be available to firefighters, public safety officers, and regulatory agencies. Typically, this information should be included in Hazardous Materials Business Plans to prevent or mitigate impacts to the environment or the health and safety of individuals from the release, or threatened release, of these materials into the workplace and environment. These regulations are set forth in Chapter 6.95 of the California Health and Safety Code, Article 1, Hazardous Materials Release Response and Inventory Project (Sections 25500 to 25520), and Article 2, Hazardous Materials Management (Sections 25531 to 25543.3).

Title 19 of the California Code of Regulations (CCR) (Public Safety, Division 2; Office of Emergency Services, Chapter 4; Hazardous Material Release Reporting, Inventory, and Response Plans, Article 4 [Minimum Standards for Business Plans]) establishes minimum statewide standards for Hazardous Materials Business Plans. These plans must include the following: a hazardous material inventory; emergency response plans and procedures; and training program information. Hazardous Materials Business Plans should contain basic information regarding the location, type, quantity, and health risks of hazardous materials stored, used, or disposed in the state. Each business will prepare a Hazardous Materials Business Plan if that business uses, handles, or stores a hazardous material or an extremely hazardous material in quantities greater than or equal to the following:

- 500 pounds of a solid substance
- 55 gallons of a liquid
- 200 cubic feet of compressed gas
- Hazardous compressed gas in any amount
- Hazardous waste in any quantity

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) is the agency with primary responsibility for worker safety with respect to the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR § 337–340). The regulations specify requirements regarding employee training, the availability of safety equipment, accident-prevention projects, and hazardous substance exposure warnings.

California Geologic Energy Management Division

CalGEM is the state agency responsible for supervising the drilling, operation, maintenance, plugging, and abandonment of oil, gas, and geothermal wells. CalGEM's regulatory program promotes the sensitive development of oil, natural gas, and geothermal resources in the state through sound engineering practices, pollution prevention, and the implementation of public safety programs. CalGEM requires that construction be avoided above or near plugged or abandoned oil and gas wells and requires that such wells be remediated to current CalGEM standards. CalGEM developed the Construction Site Plan Review Program to assist local permitting agencies in identifying and reviewing the status of oil or gas wells located near or beneath proposed structures.

Among CalGEM's Construction Site Plan Program are the following development requirements:

- The developer is required to submit a fully completed Well Review Program application to CalGEM
- The developer is required to locate all known wells located on the development site property
- CalGEM will evaluate all known wells located on the development site property. The evaluation process consists of: (1) verifying the wells have a competent surface plug; and (2) verifying the wells are not leaking any fluids or gas.

Hazardous Materials Release Response Plans and Inventory Act of 1985

The Hazardous Materials Release Response Plans and Inventory Act, commonly known as the "Business Plan Act," requires businesses that use hazardous materials to prepare a plan that describes their facilities, inventories, emergency response plans, and training programs. Hazardous materials are defined as unsafe raw or unused materials that are part of a process or manufacturing step. They are not considered hazardous waste. Health concerns pertaining to the release of hazardous materials, however, are similar to those pertaining to hazardous waste.

California Vehicle Code/California Code of Regulations on Transporting Hazardous Materials

Per Sections 31602[b] and 32104[a] of the California Vehicle Code, it is illegal to transport explosives or inhalation hazards on any public highway not designated for that purpose

unless the use of the highway is required to permit the delivery or the loading of such materials. The California Highway Patrol (CHP) designates routes to be used for the transport of hazardous materials. The transport of hazardous materials is restricted to such routes except in cases where travel from these routes is required to deliver or receive hazardous materials.

Under the California Vehicle Code, Section 32000.5, a valid, CHP-issued license to transport hazardous materials is required for the transport of hazardous materials:

- For which the display of placards is required pursuant to California Vehicle Code, Section 27903; and/or
- Weighing more than 500 pounds for which the display of placards is required.

The transport of explosives generally requires consistency with the CCR § 1160-1167 pertaining to routing, safe stopping distances, and inspection stops.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the State Hazardous Waste Management Project that is similar to, but more stringent than, the federal RCRA program. The requirements of this law are codified in the California Health and Safety Code (CHSC) Chapter 6.5 and apply to the following aspects of managing hazardous waste:

- Identification and classification
- Generation and transportation
- Design and permitting of recycling, treatment, storage, and disposal facilities
- Treatment standards
- Operation of facilities and staff training
- Closure of facilities and liability requirements.

These regulations identify more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act, the generator of hazardous waste must complete a manifest that accompanies the waste from a generator to the transporter to the ultimate disposal location. Copies of the manifest must be filed with the DTSC.

Clean Water Act

The federal CWA places the primary responsibility for the control of water pollution and for planning the development and use of water resources with the individual states, although it does establish certain guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Act that grants the SWRCB and RWQCBs broad powers to protect water quality and is the primary vehicle for implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, regulate discharges to surface and groundwater, regulate waste

disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

Asbestos-Containing Materials Regulations

State-level agencies (e.g., Cal/OSHA), in conjunction with USEPA, regulate removal, abatement, and transport procedures for asbestos-containing materials. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations, and medical evaluation and monitoring are required for employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk of asbestos emissions and exposure. Finally, federal, state, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

Polychlorinated Biphenyls

The USEPA prohibited the use of polychlorinated biphenyls (PCBs) in the majority of new electrical equipment starting in 1979 and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the Toxic Substances Control Act (15 USC § 2601 et seq.). Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and highly specific safety procedures for their disposal. The state likewise regulates PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste; these regulations require that such materials be treated, transported, and disposed, accordingly. At lower concentrations for non-liquids, RWQCBs may exercise discretion over the classification of such wastes.

Lead-Based Paint

Cal/OSHA's Lead in Construction Standard is contained in 8 CCR § 1532.1. The regulations address the following areas: permissible exposure limits; exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection; employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Senate Bill (SB) 1082 (1993) created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which requires the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a CUPA. The Program Elements consolidated under the Unified Program include the:

- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs (i.e., Tiered Permitting)

- Aboveground Petroleum Storage Tank SPCC
- Hazardous Materials Release Response Plans and Inventory Project (i.e., Hazardous Materials Disclosure or "Community Right-to-Know")
- California Accidental Release Prevention (CalARP) Program
- UST Program
- Uniform Fire Code Plans and Inventory Requirements

The Unified Program is intended to provide relief to businesses that comply with the overlapping and sometimes conflicting requirements of formerly independently managed programs. CUPA implements the Unified Program at the local government level. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local, participating agency that implements one or more program elements in coordination with the CUPA.

2023 California State Hazard Mitigation Plan

The California State Hazard Mitigation Plan (SHMP) is the official statement of the state's hazard identification, vulnerability analysis, and hazard mitigation strategy. The goal of SHMP is to guide implementation activities to achieve the greatest reduction of vulnerability, resulting in saved lives, reduced injuries, reduced property damages, and protection for the environment. In particular, the SHMP helps administer the Local Hazard Mitigation Plan (LHMP) program for the state. The California Emergency Management Agency supports and assists local governments in the development of LHMPs and tracks the progress and effectiveness of plan updates and projects. It provides local governments with information on integrating hazard identification, risk assessment, risk management, and loss prevention into a comprehensive approach to hazard mitigation and helps them identify cost-effective mitigation measures and projects.

Site Mitigation and Brownfields Reuse Program (SMBRP)

The Site Mitigation and Brownfields Reuse Program (SMBRP) and the Voluntary Cleanup Program allow DTSC to provide oversight to motivated parties and address Brownfield sites. DTSC maintains a list of sites cleaned up under the program's oversight and generally does not include current or former hazardous waste facilities that required a hazardous waste facility permit. The list represents land use restrictions that are active. Some sites have multiple land use restrictions.

2022 California Fire Code

The California Fire Code (CFC) is Part 9 of thirteen parts of the official building regulations to the California Code of Regulations. This code is also referred to as Title 24, or the California Building Standards Code. The CFC establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency

operations. The CFC applies to the construction – including the presence of fire service features and fire apparatus access roads – alteration, movement, enlargement, replacement, repair, equipment, use, occupancy, means of egress, evacuation plans, location, maintenance, and demolition and removal of every building or structure or any appurtenances connected or attached to such building structures throughout the state.

Chapter 49, Requirements for Wildland-Urban Interface Areas, contains requirements for development and construction in LRAs designated as very high FHSZ and areas designated by the Board of Forestry and Fire Protection as SRAs. The chapter includes mitigation strategies to reduce the hazards of fire originating within a structure spreading to wildland and fire originating in wildland spreading to structures. These strategies are included in the following requirements: 1) Development of fire protection plans; 2) Development of landscape plans and long-term vegetation management; and 3) Creation and maintenance of defensible space to protect structures and subdivisions.

Regional and Local Regulations

South Coast Air Quality Management District and Antelope Valley Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) and the Antelope Valley Air Quality Management District (AVAQMD) regulate asbestos through Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. Rule 1403 defines asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling/cleanup procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of asbestos-containing structures, asbestos storage facilities, and waste disposal sites.

The SCAQMD and AVAQMD also regulate volatile organic compound (VOC) emissions from contaminated soil through Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 sets requirements to control the emission of VOCs from excavating, grading, handling, and treating soil contaminated with VOCs as a result of leakage from storage or transfer operations, accidental spillage, or other deposition, including hydrocarbons.

Los Angeles County General Plan

Adopted in 2015, the Los Angeles County 2035 General Plan guides the long-term physical development and conservation of unincorporated areas through a framework of goals, policies, and implementation programs. It also serves as an advisory document to coordinate land use planning, public service and facilities planning, circulation and transportation planning, and environmental management initiatives. Through a series of principles, goals, and policies, the General Plan guides the county towards healthy, livable, and sustainable communities. The following are key policies regarding hazards and hazardous materials which are applicable to the proposed Project.

Air Quality (AQ) Element

- Policy AQ 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.
- Policy AQ 1.2: Encourage the use of low or no VOC emitting materials.
- Policy AQ 1.3: Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.

Safety Element

- Policy S 7.1: Ensure that residents are protected from the public health consequences of natural or human-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
- Policy S 7.5: Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.

Land Use (LU) Element

- Policy LU 7.6: Ensure that proposed land uses located within Airport Influence Areas are compatible with airport operations through compliance with airport land use compatibility plans.
- Policy LU 7.7: Review all proposed projects located within Airport Influence Areas for consistency with policies of the applicable airport land use compatibility plan.
- Policy LU 9.4: Encourage patterns of development that protect the health of sensitive receptors.

Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan

The Los Angeles County Department of Public Works (DPW), Environmental Programs Division (EPD), prepares and administers the Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan, which provide direction for proper management of all waste generated within the county. As the County's lead agency, it advises the Los Angeles County Board of Supervisors regarding all waste management issues. EPD implements numerous programs to meet state-mandated solid waste reduction goals, including recycling, composting, source-reduction, household hazardous waste management, and public education programs.

Certified Unified Program Agency/Los Angeles County Fire Department

The LACoFD Health Hazardous Materials Division is the CUPA for the county. The CUPA includes the Hazardous Waste Generator Program; the Hazardous Materials Release Response Plans and Inventory Program; the California Accidental Release Prevention Program; the Aboveground Storage Tank Program; and the Underground Storage Tank Program.

County of Los Angeles Operational Area Emergency Operations Plan

Managed by the County of Los Angeles Office of Emergency Management, the Operational Area Emergency Operations Plan (EOP) establishes policy direction for emergency planning, mitigation, response, and recovery activities within the county. The EOP addresses interagency coordination by outlining Emergency Support Functions (ESFs), which groups response resources and capabilities from several primary and support agencies. California ESF #10-Hazardous Materials is responsible for coordinating resources to prepare, prevent, mitigate, and respond to threats due to actual or potential hazardous materials releases. As the CUPA, the LACFD is the primary agency, while receiving support from Public Health, Public Works, and Sheriff departments.

Los Angeles County Code, Title 32 – Fire Code

Title 32 of the LACC adopts by reference the 2022 Edition of the CFC and establishes the minimum requirements for providing a reasonable level of life safety and property protection from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures and premises, and to provide a reasonable level of safety to fire fighters and emergency responders during emergency operations. Title 32 establishes standards for new and existing development relating to fire apparatus access, emergency access of structures, water supply and storage, fire hydrants, and fire suppression systems. Chapter 325 of Title 32 establishes requirements for the clearance of brush and vegetative growth, as well as the establishment of defensible space, around structures.

3.4.3 Impact Assessment Methodology

Significance Thresholds

According to Appendix G of the CEQA Guidelines, a project would have a significant impact related to hazards and hazardous materials or wastes if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involved in the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- 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 result in a safety hazard or excessive noise for people residing or working in the project area;

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Los Angeles County has the following unique thresholds that are in addition to the CEQA Guidelines thresholds stated above. Pursuant to the County's thresholds, a project would have a significant impact related to hazardous materials or wastes if it would:

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses
- 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:
  - A high fire hazard area with inadequate access;
  - An area with inadequate water and pressure to meet fire flow standards;
  - Proximity to land uses that have the potential for dangerous fire hazards; and/or
  - Constitute a potentially dangerous fire hazard.

Methodology

This analysis describes how the proposed Project could result in increased hazards to the human and physical environment from the use, storage, transport, and discharge of hazardous materials, as well as licensing cannabis activities in existing and permitted structures that are subject to existing hazards. This analysis also integrates current information on contaminated sites and wildfire hazards. Refer to Chapter 3, *Environmental Impact Analysis*, for a detailed discussion of projected cannabis activities in the county due to implementation of the proposed Project. The analysis is based on: (1) a review of the existing hazards in the county identified in Section 3.4.1, *Environmental Setting*; (2) the applicable federal, state, and local regulations; and (3) the implementation of requirements specific to the proposed Project that would limit adverse impacts of commercial cannabis businesses in certain areas.

3.4.4 Environmental Impacts Analysis

HAZ-1:	The proposed Project would not result in the creation of a significant hazard to the public or the environment due to the routine transport, use, or disposal of hazardous materials.

The proposed Project would establish the Commercial Cannabis Licensing Program that would license, regulate, and monitor certain activities that will involve the routine use, storage, transport, and disposal of hazardous materials. Hazardous materials associated with cannabis businesses vary depending on the type and scale of operations (e.g., retail, manufacturing); however, typical hazardous materials include fuels, solvents, paints, oils, grease, fertilizers, cleaning products, and pesticides, as well as volatile and flammable gases and liquids used in manufacturing. Although cannabis activities do not typically require

substantial quantities of these materials, commercial cannabis activities would involve at least some use, handling, storage, and disposal of such materials.

All licensed cannabis businesses involving the use, handling, storage, transport, and/or disposal of hazardous materials would be subject to federal, state, and local regulations, as well as requirements under the proposed LACC Title 22 and Title 8 Ordinances. In addition, commercial cannabis activities would be subject to State licensing requirements. As previously described, DCC regulations (CCR Title 4) outline stringent statewide regulations for commercial cannabis operations, which regulate the use of volatile solvents, standard operating procedures, waste management, etc. For example, the local fire code official must approve all professional closed-loop systems and other extraction equipment, as specified in CCR Title 4 § 17206 Closed-Loop Extraction System Requirements.

In addition, the DCC mandates compliance with existing environmental and hazardous materials laws, such as those outlined in the CCR. For example, CHSC Chapter 6.5, also known as the Hazardous Waste Control Act, prescribes hazardous waste processes that are more stringent than the federal RCRA program. The CHSC Chapter 6.5 regulations identify more than 800 potentially hazardous materials and outlines the processes for handling potentially hazardous materials, ensuring their safe transport and disposal to protect public health and the environment. Other regulatory agencies and regulations which commercial cannabis operations must comply with include the following:

- USEPA and CalEPA regulate the use of pesticides, fertilizers, and other hazardous materials used in the cultivation of food and non-food products.
- OSHA requires health and safety protocols for employees from occupational hazards.
- The California Vehicle Code regulates the transportation of hazardous materials.
- The CFC requires the use of suppression systems, ventilation, fire-rated storage containers, secondary containers, and explosion-proof equipment.

The routine use, storage, transport, and disposal of hazardous waste would be restricted to eligible zones, pursuant to the proposed LACC Title 22 amendments. Cannabis businesses would be located only in eligible industrial, commercial, commercial-only mixed-use, and institutional zones, with all business types prohibited in residential, agricultural, open space, and other zones that have substantial numbers of sensitive receptors and/or characteristics that would exacerbate hazardous conditions (e.g., fuel loads). Further, licensed cannabis businesses also would be subject to certain setback requirements (buffers) from youth-oriented uses, drug abuse and recovery treatment centers, and existing storefront retail cannabis businesses. The selected eligible zones and buffer requirements would limit the potential for the routine use of hazardous materials to adversely affect the public and the environment.

In summary, commercial cannabis businesses are governed by a comprehensive regulatory framework that minimizes the potential for the routine use, storage, transport, and disposal of hazardous materials to create substantial hazards to the public. Under the proposed LACC Title 22 amendments, cannabis businesses that have greater levels of risk (i.e.,

manufacturing) would be restricted to eligible industrial zones, thereby minimizing risks resulting from potential, accidental exposure to sensitive receptors and ensuring land use compatibility. Therefore, there would be a *less than significant* impact regarding the routine use, transport, storage, and disposal of hazardous materials.

HAZ-2: The proposed Project would not 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.

As previously described, licensed cannabis businesses could involve the use, storage, transport, and disposal of hazardous materials (e.g., volatile and flammable gases and liquids, fuels, solvents, paints, oils, grease, fertilizers, and pesticides). While cannabis operations often do not require large quantities of hazardous materials, the presence of materials has the potential to create hazards due to upset and/or accidental conditions. However, all commercial cannabis businesses would be subject to federal, state, and local regulations that would reduce the likelihood and/or level of adverse impacts that could result from a release.

For example, CCR Title 19, Division 5, Chapter 1 requires the preparation of a Hazardous Materials Business Plan (HMBP) for businesses that handle hazardous materials or mixture containing hazardous materials over a threshold identified in CCR Title 19 § 5030.2 Business Plan General Requirements. The purpose of a HMBP is to prevent or minimize harm to the public and environment from a release or threatened release of a hazardous substance. Overseen and implemented by the CalEPA and CUPAs, respectively, a HMBP contains detailed information that discloses the presence of hazardous materials and the safety procedures in the event of a release.

In addition, as described in Impact HAZ-1, licensed cannabis businesses would be subject to existing environmental and hazardous material laws and regulations (e.g., USEPA, CalEPA, and OSHA). Other applicable regulations include the CFC and the LACC Title 32 Fire Code, which include provisions on emergency vehicle access, water supply for fire suppression, life safety features, and standards for facilities located within a high fire hazard severity zone. (See also Impact HAZ-7 and Impact HAZ-8, below.)

Licensed cannabis businesses would be restricted to existing and permitted structures located in eligible industrial, commercial, commercial-only mixed-use, and institutional zones. They also would be subject to certain setback buffers from youth-oriented uses, drug abuse and recovery treatment centers, and existing storefront retail cannabis businesses. As such, the eligible zones and buffers ensure separation of hazardous materials from sensitive uses and reduce the risk of exposure during an accidental release.

The proposed LACC Title 8 Ordinance Amendment also would establish an initial limit on the number of licenses and percentage of licenses within a General Plan Planning Area. This approach ensures geographic distribution of cannabis operations and associated

hazardous materials and prevents over-concentration in any one area. As a result, this would lower the risk of significant exposure to hazardous materials in the event of an accidental release or emergency conditions.

Therefore, while the proposed Project has the potential to create a hazard to the public and environment through the foreseeable upset or release of hazardous materials, all commercial cannabis business activities would be subject to federal, state, and local regulations that reduce the likelihood and/or level of hazard. In addition, the proposed LACC Title 22 and Title 8 amendments provide further protection to the public and environment through buffers and licensing limitations. Therefore, the impact is considered *less than significant*.

HAZ-3: Although the proposed Project could result in hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and/or sensitive uses, compliance with existing regulations and new regulations that the proposed Project would impose on commercial cannabis businesses would prevent significant impacts associated with hazardous emissions, materials, substances, and/or wastes, to schools and/or sensitive uses.

As previously described, the proposed Project would involve the licensing of cannabis businesses that may involve the use of hazardous materials. Given that the proposed Project involves the adoption of a program that will allow commercial cannabis businesses by zoning and other features, rather than a specific cannabis business, the precise location of future cannabis businesses is currently unknown, and their proximity to schools and other sensitive uses cannot be determined at this time. Licensed cannabis businesses would be subject to several buffers from certain uses, including 600-feet from youth-oriented uses, such as public and private schools. While this buffer requirement does not exclude cannabis activities from within a 0.25-mile radius of existing or proposed schools, the buffer ensures that cannabis activities would not be immediately adjacent to them. Nevertheless, the use and handling of hazardous materials associated with cannabis operations may be located within 0.25-mile radius of an existing or proposed school and sensitive uses.

As described in Impact HAZ-1 and Impact HAZ-2, licensed cannabis businesses would be required to comply with existing federal, state, and local regulations, including, but not limited to, regulations issued by the USEPA, CalEPA, OSHA, DCC, etc., and mandated under the CCR (e.g., Titles 4 and 19). Compliance with such regulations would limit the adverse effects of hazardous materials that may be near sensitive uses. In addition, the proposed LACC Title 22 amendments would restrict cannabis businesses to only eligible industrial, commercial, commercial-only mixed-use, and institutional zones. The eligible zones have been assigned based on the objectives of the zones, type of cannabis activities, and the cannabis activity's compatibility with other uses allowed in the respective zone. For example, cannabis manufacturing, which may involve volatile materials, would be

restricted to industrial zones, thereby restricting the manufacturing activities to areas that typically do not include large numbers of building occupants or residents.

Therefore, although the proposed Project could indirectly result in the establishment of one or more future cannabis businesses within a 0.25-mile radius of an existing or proposed school or sensitive use, all businesses would be required to comply with applicable hazardous material laws and additional requirements that the ordinance amendments would establish, thereby substantially reducing risks to schools or sensitive receptors. Therefore, the impact is considered *less than significant*.

HAZ-4: Although the proposed Project could result in the location of a commercial cannabis activity on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, compliance with existing regulations and new regulations that the proposed Project would impose on commercial cannabis businesses would prevent significant impacts associated with the creation of a significant hazard to the public or the environment.

The DTSC Envirostor and SWRCB Geotracker databases indicate that the county includes numerous hazardous material sites, including Superfund Sites, LUST Cleanup Sites, Cleanup Program Sites, Military Sites, ILRP Sites, and Permitted UST Facilities. Given that the proposed Project only establishes eligible zone districts for cannabis businesses, the precise location of future cannabis businesses is currently unknown, and their potential proximity to such hazardous materials sites cannot be determined at this time. As a result, there is the possibility that a future cannabis business could be located on or near a site with known hazardous conditions.

However, the proposed Project is exclusively a licensing program and does not permit new development that is not otherwise already permissible pursuant to Title 22. Under the proposed LACC Title 22 amendments, all future cannabis businesses would be restricted to existing and permitted structures only; any new physical development associated with the proposed Project would be limited to minor renovations, interior improvements, and site landscaping that are unlikely to expose contaminated soils or exacerbate hazardous site conditions. Furthermore, if a cannabis business owner considers occupying a property that includes a hazardous materials site, the cannabis business would be required to remediate or ameliorate the conditions that resulted in the site's classification as a hazardous material site, as part of the ministerial site plan review (i.e., zoning permit) prior to establishing the cannabis business. Therefore, the proposed Project would not create a significant hazard to the public or environment due to the potential for a cannabis business to be located on a hazardous materials site. The impact is considered *less than significant*.

HAZ-5: The proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

As previously described in Section 3.4.2, *Regulatory Setting*, the County's Office of Emergency Management maintains and oversees implementation of the EOP that establishes the coordinated emergency management system within the Los Angeles County Operational Area. The EOP does not identify specific evacuation routes; however, the County Sheriff Department is responsible for ensuring public safety by disseminating information to the public, leading evacuation coordination and traffic control, and ensuring order in affected areas.

The proposed Project would not involve new programs or development that would impair implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan (i.e., the EOP). All cannabis businesses would be restricted to existing and permitted structures and any new physical development associated with future cannabis uses would be limited to accessory structures, building remodels and renovations (e.g., façade treatments and new fenestration), and site landscaping. These limited changes would not result in substantial modifications to the circulation network or site access that would hinder evacuation efforts, traffic control, or response plan implementation.

Further, all cannabis business facilities, including any building or site improvements, would be subject to the LACC Title 32 Fire Code requirements regarding emergency access, evacuation, fire suppression, Americans with Disabilities Act (ADA) accessibility, and remodels of existing buildings. Therefore, the proposed Project would result in *no impacts* regarding adopted emergency response plans or emergency evacuation plans.

HAZ-6:	The proposed Project would not result in the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

As previously described, the local topography, vegetative fuel composition, and weather conditions increase the county's susceptibility to wildfire. Accordingly, CAL FIRE identified several areas of the unincorporated County as very high FHSZs. 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, commercial-only mixed-use, industrial, and institutional zones, some of which exist within identified very high FHSZs, such as in the Santa Monica Mountains. However, all buildings would be required to comply with the LACC Title 32 Fire Code, which includes requirements regarding emergency access, water supply and pressure for fire suppression, and inspection procedures. Specifically, § 503 Fire Apparatus Access Roads includes fire apparatus requirements for commercial and industrial development and § 504.1 Required Access requires all exterior doors and openings readily accessible for emergency access by the fire department. Furthermore, § 507 Fire Protection Water Supplies Appendix B and Appendix C includes specifications on reliable water supply sources and infrastructure requirements. The LACC Fire Code would also require operators

of cannabis businesses located within mapped very high FHSZs to obtain applicable permits, undergo LACFD building inspections, comply with vegetation management and brush clearance requirements, and operate their cannabis business in compliance with fire prevention and emergency access requirements.

All future cannabis buildings and sites would comply, or be modified to comply, with the LACC Fire Code and LACFD standards to ensure all facilities are properly inspected, with increased scrutiny for properties located in a very high FHSZ. In addition, due to the relatively limited amount of site modifications that would be allowed (e.g., renovations of existing buildings, installation of irrigation systems), the proposed Project is not anticipated to place substantial new demand on existing fire suppression systems. Therefore, the impacts would be *less than significant*.

HAZ-7: The proposed Project would not result in the creation of a potentially dangerous fire hazard.

As previously described, typical hazardous materials used in commercial cannabis operations may include volatile and flammable gases and liquids, fuels, solvents, paints, oils, grease, and pesticides, as well as volatile and flammable gases and liquids used in manufacturing. As such, certain commercial cannabis businesses (e.g., those which conduct indoor cultivation or volatile manufacturing activities) may present a fire hazard.

However, as detailed in Impact HAZ-7, all businesses would comply with LACC Title 32 Fire Code, which requires adequate emergency access, water supply and pressure, and inspection procedures. In addition, cannabis businesses, if applicable, would be subject to a unified program facility permit, in accordance with LACC Title 12 Environmental Protection, Chapters 12.50, 12.52, and 12.64. The LACFD also would enforce standards and regulations for cannabis businesses, such as Regulation #30, which requires the LACFD to conduct plan review for all commercial building or tenant spaces that handle cannabis products. Therefore, impacts resulting from the proposed Project would be *less than significant*.

3.4.5 Cumulative Impacts

As described in Chapter 2, *Project Description*, the proposed Project would license certain commercial cannabis businesses in eligible industrial, commercial, commercial-only mixed-use, and institutional zones. Cumulative development within the eligible zones has the potential to introduce or exacerbate hazardous conditions through the use, transport, storage, or release of hazardous materials, or the risk for fire hazards.

However, the proposed Project would limit new commercial cannabis businesses to existing, permitted buildings and, consequently, would not result in substantial new physical development that could interfere with emergency response and/or evacuations. Similar to the proposed Project, past, present, and foreseeable projects were/are subject to federal, state, and local environmental and hazardous materials regulations to minimize the

adverse effects of a release or exposure to hazardous substances, comply with fire-related building requirements, and ensure that adequate emergency access is provided at each project site.

In addition, under LACC Title 8, the County would limit the total number of licenses and percentages of available licenses that could be issued within the same General Plan Planning Area and Supervisorial District. The spatial requirements regarding the acceptable locations of commercial cannabis businesses, along with the LACC Title 22 eligible zones and buffer requirements, would avoid creating a substantial number of commercial cannabis businesses concentrated within any given area, thereby reducing the potential for localized cumulative impacts such as increased risk of hazardous materials spills, exposure, or interference with emergency response in areas with foreseeable development associated with hazardous activities (e.g., manufacturing).

For these reasons, the proposed Project would not result in a cumulatively considerable contribution to a significant cumulative impact regarding hazards and/or hazardous materials.

3.4.6 Mitigation Measures

The proposed Project would result in *less than significant* impacts regarding hazards and hazardous materials. Therefore, no mitigation measures are required.

3.5 LAND USE AND PLANNING

The Commercial Cannabis Business Licensing Program (Project) involves the adoption of amendments to the Los Angeles County Code (LACC) to establish commercial cannabis activities as an allowable use within certain eligible zoning districts in the unincorporated county. Commercial cannabis business would be allowed under certain conditions within commercial, industrial, institutional, and commercial-only mixed-use zones located in the unincorporated areas of Los Angeles County. Although the proposed Project would not directly result in physical development, the proposed Project would result in a limited amount of indirect development associated with the establishment and use of the commercial cannabis businesses. This indirect development would be subject to a number of environmentally related countywide General Plan policies including, but not limited to, community, area, and specific plan policies noncompliance with which could result in a significant environmental impact.

This section identifies and evaluates environmental impacts related to land use and planning that could result from the proposed implementation of the Commercial Cannabis Business Licensing Program (Project). Existing land uses within the areas of the inland and coastal regions of Los Angeles County where commercial cannabis activities would be permissible are described, along with applicable County of Los Angeles (County) land use policies and regulations. Impacts from potential, new commercial cannabis uses that would be allowed within these areas are assessed based on consistency with County land use designations, zoning regulations, other related and relevant plans, ordinances, and standards. The general assumptions and methodology for this analysis are detailed in Chapter 3, *Environmental Impact Analysis*.

A summary of the impacts related to land use and planning identified in this section is provided in Table 3.5-1.

Table 3.5-1. Land Use and Planning Summary of Impacts

Land Use Impacts	Mitigation Measures	Impact Classification
Impact LUP-1. The proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	None required	Less than significant
Cumulative Impacts	None required	Less than significant

3.5.1 Environmental Setting

Los Angeles County covers approximately 4,083 square miles, of which approximately 2,569 square miles consists of unincorporated area. Located partially within both the coastal zone and inland areas, Los Angeles County includes approximately 75 miles of the coastline along the Pacific Ocean and is bordered to the east by Orange County and San Bernardino County, to the north by Kern County, and to the west by Ventura County. Los Angeles County also includes two offshore islands, Santa Catalina Island and San Clemente Island (refer to Figure 2-1).

Los Angeles County generally consists of three defining geographical areas/features: coastal plain, which includes beaches, valleys, and canyons in the Los Angeles Basin to the Transverse Ranges; mountainous areas consisting of the Transverse Ranges, specifically the San Gabriel Mountains; and the high desert, which includes the Antelope Valley in the western portion of the Mojave Desert.

The current population of Los Angeles County is estimated to be 10,014,009, with approximately 1,022,139 people who reside in the unincorporated area. The remainder (approximately 8,991,870) reside in one of the 88 incorporated cities located within Los Angeles County, the largest of which consist of the City of Los Angeles at approximately 3,898,536 residents, the City of Long Beach at 464,284 residents, and the City of Santa Clarita at 228,333 residents (California Department of Finance 2025).

The unincorporated area of Los Angeles County is divided into 11 planning areas established in the General Plan for land use planning purposes and approximately 120 unincorporated communities within these planning areas.. The unincorporated areas in the northern portion of the County consist of sparsely populated land, and include the Angeles National Forest, part of the Los Padres National Forest, and the Mojave Desert. The unincorporated areas in the southern portion of the county consist of many non-contiguous, urbanized areas of land (or “urban islands”) and include both inland and coastal communities. The general land use designations for the unincorporated areas are shown in Table 3.5-2.

Table 3.5-2. General Land Use Categories

Land Use Category	Area (Square Miles)
Residential	80.4
Rural	1,002
Commercial	8.2
Industrial	11.4
Natural Resources*	1,319
Public and Semi-Public	124.8
Mixed Use	0.5
Specific Plan**	21.2

Land Use Category	Area (Square Miles)
Other***	1.7
Total	2,569

Source: Los Angeles County General Plan, Land Use Element, Table 6.1.
Notes:
* Natural Resources include all natural resource and categories (including natural areas, developed parks, waterways, golf courses, etc.), and military areas (San Clemente Island and Edwards Air Force Base [AFB]).
** Specific Plans include a combination of land uses.
*** Some area and community plans have special categories that do not fit into the scheme of the Land Use Legend categories (such as "special use sites," parking areas, senior citizen density bonus areas, etc.)

As shown in Table 3.5-2, natural resources and rural areas constitute approximately 90 percent of the unincorporated areas of Los Angeles County. Approximately 50 percent (or 1,257 square miles) includes open space resources that consist of public and private lands and waters that are preserved in perpetuity or for long-term open space and recreational use. The following programs, plans, and land use designations play a significant role in the conservation and/or preservation of resources found within these areas:

- Habitat Conservation Plans (HCPs): An HCP is a planning document designed to accommodate economic development to the extent possible by authorizing the limited and unintentional take of federally listed (i.e., rare, threatened, and endangered) species when it occurs incidental to otherwise lawful activities. HCPs are designed not only to help landowners and communities but also to provide long-term benefits to species and their habitats (U.S. Fish and Wildlife Service [USFWS] n.d.).
- California Natural Community Conservation Plans (NCCP): An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. NCCPs are the primary tool for implementing the California Department of Fish and Wildlife's (CDFW's) NCCP program, which implements an ecosystem approach to planning for the protection and perpetuation of biological diversity (CDFW n.d.).
- LACC Hillside Management Areas (HMAs): The LACC (Title 22, Chapter.104, *Hillside Management Areas*) designates land which contains terrain with a natural slope gradient of 25 percent or steeper as HMAs and sets forth specific entitlements that are required for, and development standards that apply to, development within such areas. The purposes of the HMA designation are to: locate development outside of HMAs to the extent feasible and, if infeasible, in the portions of HMAs with the fewest hillside constraints; and implement sensitive hillside design techniques tailored to a designated site's unique characteristics.

- LACC Significant Ecological Areas (SEAs): SEAs are officially designated areas within Los Angeles County with irreplaceable biological resources. The SEA Program, through goals and policies of the General Plan and the SEA ordinance (Title 22 Chapter 22.102, *Significant Ecological Areas*), help guide development within SEAs. The General Plan goals and policies are intended to ensure that privately held lands within the SEAs retain the right of reasonable use, while avoiding activities and developments that are incompatible with the ability of SEAs to thrive in the long term.

In addition to the general land use designations and conservation measures described above, Los Angeles County further organizes and manages land use within the unincorporated areas according to the Planning Areas Framework, thereby affording local communities the opportunity to work with the County to develop plans that address the unique and diverse characteristics of each Planning Area. Given substantial differences between some of the areas and communities within the unincorporated areas, many of these distinct areas and communities are subject to unique, environmentally related development goals, policies, development standards, and zoning regulations which are in addition to countywide requirements set forth in the Los Angeles County General Plan and LACC. A summary of key characteristics of the 11 planning areas is provided in Table 3.5-3; for additional information regarding the planning areas, refer to Sections 2.2.1, *Project Location* and Section 2.2.2, *Environmental Baseline Conditions,* and see Section 3.5.2, *Regulatory Setting*.

3.5.2 Regulatory Setting

State and local plans, policies, and regulations have been enacted to address land use and planning in Los Angeles County. The following section summarizes applicable policies and regulations that relate to the proposed Project and its associated impacts. There are no federal regulations that pertain to local land use and planning on non-federal lands; however, as described above, there are certain, voluntary federal programs regarding resource protection inconsistency which could result in significant impacts.

State Regulations

Department of Cannabis Control

The Business and Professions Code (§ 26013) grants the Department of Cannabis Control (DCC)[1] the authority to adopt rules and regulations to implement, administer, and enforce its duties under the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) (Ibid, § 26000 et seq.). Pursuant to this authority the DCC adopted a

[1] Refer to Section 2.3.1, *Project Background* which summarizes key requirements of DCC-enforced State licensing regulations.

comprehensive set of State licensing regulations that are set forth in the California Code of Regulations (CCR), Title 4, §§ 15000 through 17905, which address the following:

- Content, fee, and procedural requirements for State license applications
- Requirements for maintaining, amending, and renewing State licenses
- Operational requirements for licensed cannabis businesses (e.g., posting licenses, advertising, security measures, and track and trace requirements)
- Specific operational and other requirements for distributors, retailers, microbusinesses, cannabis events, testing laboratories, cultivators, and manufacturers
- Content, labeling, and packaging requirements for cannabis and cannabis products
- Enforcement procedures
- Research funding

State licensing requirements are in addition to local jurisdictions' cannabis regulations. In order to operate a commercial cannabis operation in California, operators must comply with both State and local permitting and/or licensing requirements.

Government Code § 65300 (General Plans)

Government Code § 65300 requires that each county and city prepare a general plan that serves as the blueprint for how that jurisdiction will develop over time. The general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private. Zoning ordinances, specific plans, development projects, capital improvements, and development agreements are required to conform to the general plan. In addition, preparing, adopting, implementing, and maintaining the general plan serves to identify the community's land use, circulation, environmental, economic, and social goals and policies as they relate to future growth and development. A general plan consists of individual sections, or elements, that address a specific area of concern, but collectively, they comprehensively make up an integrated planning approach for the jurisdiction. State law requires that general plans include the following seven elements (as well as others depending on the specific location of the jurisdiction): land use; transportation; conservation; noise; open space; safety; and housing. Each county and city may choose to have additional elements as part of their general plan.

Table 3.5-3. Los Angeles County Planning Areas

Planning Area	Location[1]	Supervisorial District[2]	Key Features
Antelope Valley	Approximately 60 miles north of Downtown Los Angeles	5	• Predominantly rural, but subject to substantial residential growth • Mostly consists of the Angeles National Forest • Location of the Antelope Valley SEA, San Andreas SEA, Joshua Tree Woodlands SEA, and Santa Clara River SEA
Coastal Islands	San Clemente Island and Santa Catalina Island	4	Santa Catalina Island: • Includes entire Island except for the City of Avalon • Subject to the Santa Catalina Island Local Coastal Program (LCP) • Predominantly coastal open space, resource protection, and outdoor recreation San Clemente Island: • U.S. Navy owned and operated Inaccessible to the public
East San Gabriel Valley	Easternmost area of Los Angeles County	1, 5	• Mostly suburban incorporated cities (e.g., Glendora, West Covina, and Pomona) and several unincorporated communities including Avocado Heights, Hacienda Heights, and Rowland Heights • Mostly residential with some industrial and commercial areas and others consisting of SEAs, open space, agriculture, and ranching
Gateway	Southeastern portion of Los Angeles County	2, 4	• Includes several incorporated cities (e.g., Long Beach) • Relatively large corridor of industrial development associated with the port of Long Beach, extending into Downtown Los Angeles • Includes unincorporated communities of Rancho Dominguez, Whittier, and South Whittier
Metro	Downtown Los Angeles	1, 2, 4	• Highly urbanized area • Mix of retail commercial, institutional, industrial, and residential uses

Planning Area	Location[1]	Supervisorial District[2]	Key Features
			• Communities are predominately residential with commercial and industrial uses (e.g., East Los Angeles, East Rancho Dominguez, Florence-Firestone, and Willowbrook)
San Fernando Valley	Approximately 10-15 miles northwest of Downtown Los Angeles	3, 5	• Almost exclusively suburban • Mostly consists of cities (e.g., Burbank and San Fernando) • Adjacent to vacant, environmentally sensitive, and hazardous areas (e.g., wildfire prone) • Includes Universal Studios Specific Plan area and Oat Mountain
Santa Clarita Valley	Approximately 30-40 miles northwest of Downtown Los Angeles	5	• Substantial open space and wildland features such as National Forest lands, steep hillsides, SEAs, and hazardous areas (e.g., wildfire prone) • One of the fastest growing areas in Los Angeles County with suburban residential, retail commercial, and industrial business park development
Santa Monica Mountains	Santa Monica Mountains and shoreline to the Ventura County line	3	• Mostly open space and outdoor recreational areas (e.g., county, State, and federal parks) • Relatively small and isolated residential communities • Steep mountains, rolling hills, canyons, beaches, streams, oak woodlands, and hazardous areas (e.g., wildfire prone)
South Bay Planning Area	Southwest corner of Los Angeles County	2, 4	• Heavily urbanized • Location of multiple airports (e.g., Los Angeles International Airport) • Includes port of Los Angeles – a major transportation hub • Substantial industrial development – some of which has been redeveloped for residential use
West San Gabriel Valley Planning Area	North of Downtown Los Angeles, with Interstate 605	1, 5	• Mix of open space (e.g., wildlands, steep slopes, and wildfire prone areas) and suburban development (e.g., residential and retail commercial) • Includes Altadena Foothills and Arroyos SEA, San Gabriel Canyon SEA, and Puente Hills

Planning Area	Location[1]	Supervisorial District[2]	Key Features
	as border to the east		
Westside Planning Area	Western, coastal portion of Los Angeles County including Marina del Rey	2, 3	• Consists of residential development, commercial corridors and centers, small office campuses, and civic and educational facilities, parks, and open spaces • Significant coastal open space and recreational resources (e.g., Marina del Rey, beaches, Ballona Creek, Baldwin Hills and Kenneth Hahn State Park)

Notes:
[1] See https://www.arcgis.com/apps/mapviewer/index.html?layerId=31&layers=26fe6b7e70ec41b285d9f5517abd611a for a map of the Planning Areas.
[2] See https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=662cf89b95e045dbadac95803b5859ee for a map of the Los Angeles County Supervisorial Districts.

California Coastal Act

The California Coastal Act (Public Resources Code, Division 20), adopted in 1976, defines, and sets forth regulations regarding development and the protection of resources within, the "coastal zone" in California (generally, the area within 1,000 yards of the mean high tide line of the sea). The Coastal Act places particular emphasis on coastal resources protection, economic development that is contingent on coastal resources, and the public's right to access the shoreline. Specifically, the Coastal Act establishes the following basic goals of the State for the coastal zone:

- Protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources.
- Ensure orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs of the people of the State.
- Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners.
- Ensure priority for coastal-dependent and coastal-related development over other development on the coast.
- Encourage State and local initiatives and cooperation in preparing procedures to implement coordinated planning and development for mutually beneficial uses, including educational uses, in the coastal zone.
- Anticipate, assess, plan for, and, to the extent feasible, avoid, minimize, and mitigate the adverse environmental and economic effects of sea level rise within the coastal zone (Coastal Act § 30001.5).

The Coastal Act created the California Coastal Commission which has primary responsibility for implementation of the Coastal Act. The Coastal Commission maintains permitting authority for development within the coastal zone until the time at which a local jurisdiction (county or city) prepares, and receives Coastal Commission certification of, a local coastal program (LCP). An LCP consists of a: land use plan that establishes goals and policies, land use classifications, and the type and density of allowable development within the coastal zone; and a local implementation plan (ordinance) that sets forth specific zoning regulations and procedures for development within the coastal zone. After receiving Coastal Commission certification of its LCP, a local jurisdiction assumes primary permitting authority for most development located within the area that is subject to the local jurisdiction's LCP.

The unincorporated area of Los Angeles County includes the following coastal areas:

- Marina del Rey
- Santa Catalina Island

- Santa Monica Mountains
- San Clemente Island
- Ballona Wetlands Area A

Los Angeles County has adopted a separate LCP for Marina del Rey, Santa Catalina Island, and the Santa Monica Mountains, as follows.

- The Marina del Rey Land Use Plan (LUP) guides development in the 804-acre County-owned marina, and places particular emphasis on the preservation of, and/or enhancements to, recreation (especially recreational boating) and visitor-serving facilities; marine, biological, and cultural heritage resources; and new development that is consistent with the objectives of the Coastal Act. The LACC (Title 22, Planning and Zoning Code, §§ 22.46.890 et al.) includes the body of regulations that constitute the implementation plan for the Marina del Rey LCP.
- The Santa Catalina Island Local Coastal Plan provides the goals and requirements consistent with a 1974, 50-year Open Space Easement Agreement between the County of Los Angeles and the Santa Catalina Island Company, to preserve the character of Santa Catalina Island and improve access to Santa Catalina and its recreational opportunities. The LACC (Ibid, §§ 22.46.045 et al.) includes the body of regulations that constitute the implementation plan for the Santa Catalina Island LCP.
- The Santa Monica Mountains Land Use Plan applies to the approximately 80 square mile unincorporated area of the Santa Monica Mountains and sets forth land use designations, development policies, and programs for the protection of environmentally sensitive habitat areas; protection of, and enhancements to, public recreational opportunities; allowance of limited development (primarily residential); and protection from natural hazards. The LACC (Ibid, Chapter 22.44) includes the body of regulations that constitute the implementation plan for the Santa Monica Mountains LCP.

Local Regulations

Los Angeles County General Plan

The Los Angeles County General Plan provides the policy framework and establishes the long range vision for how and where the unincorporated areas will grow, and establishes goals, policies, and programs to foster healthy, livable, and sustainable communities. Five guiding principles animate the concept of sustainability in the General Plan:

1. Employ Smart Growth: Shape new communities to align housing with jobs and services; and protect and conserve the County's natural and cultural resources, including the character of rural communities.
2. Ensure community services and infrastructure are sufficient to accommodate growth: Coordinate an equitable sharing of public and private costs associated with providing appropriate community services and infrastructure to meet growth needs.

3. Provide the foundation for a strong and diverse economy: Protect areas that generate employment and promote programs that support a stable and well educated workforce. This will provide a foundation for a jobs-housing balance and a vital and competitive economy in the unincorporated areas.
4. Promote excellence in environmental resource management: Carefully manage the County's natural resources, such as air, water, wildlife habitats, mineral resources, agricultural land, forests, and open space in an integrated way that is both feasible and sustainable.
5. Provide healthy, livable and equitable communities: Design communities that incorporate their cultural and historic surroundings, are not overburdened by nuisance and negative environmental factors, and provide reasonable access to food systems. These factors have a measurable effect on public well-being.

As the "blueprint for community development," the Los Angeles County General Plan sets forth countywide requirements, complemented by more specific requirements for certain areas and communities, as described below. The Los Angeles County General Plan includes 10 elements consisting of both State-mandated (California Government Code § 65302 et seq.) and optional elements. The Land Use Element is central to the organization of the General Plan and includes a map that identifies the basic land use designations of property along with a narrative description of the purpose of each land use designation accompanied by specific goals, policies, and programs to actualize the purpose of each land use designation.

Los Angeles County Area, Community, and Specific Plans

The Los Angeles County General Plan is the foundational document for all community-based plans that serve the unincorporated areas. The General Plan identifies 11 planning areas that currently are subject to 11 area, land use, or coastal plans.[2] The purpose of the Planning Areas is to provide a mechanism for local communities to work with the County to develop plans that respond to their unique and diverse character and, for the Coastal Islands Planning Area, to satisfy unique requirements of the Coastal Act. The adopted area, land use, and coastal plans are:

- Antelope Valley Planning Area Plan
- East San Gabriel Valley Planning Area Plan
- Gateway Planning Area Rezoning Program
- Marina del Rey Land Use Plan
- Metro Area Plan
- Santa Catalina Island Local Coastal Plan
- Santa Clarita Valley Area Plan
- Santa Monica Mountains Land Use Plan

[2] The San Fernando Valley Area Plan is pending.

- Santa Monica Mountains North Area Plan
- South Bay Area Plan
- West San Gabriel Valley Area Plan
- Westside Area Plan

Some smaller geographic areas within the Planning Areas also are subject to Community Plans, which address neighborhood and community-level land use and planning issues. The Community Plans include the following:

- Altadena Community Plan
- Hacienda Heights Community Plan
- Rowland Heights Community Plan
- Twin Lakes Community Plan

The goals, policies, and programs in the Planning Area and Community Plan documents complement the countywide General Plan by adding requirements specific to the development and use of properties within each area or community.

Finally, the County has adopted 10 specific plans that articulate specific planning objectives and provide flexibility in development design for certain localities and/or characteristics of the built environment within designated areas of the unincorporated county. The specific plans provide both general planning direction and specific implementation requirements and programs to actualize the development objectives set forth in the specific plans. The specific plans consist of the following:

- Connect Southwest LA Specific Plan
- East Los Angeles 3rd Street Specific Plan
- Florence-Firestone Transit Oriented District Specific Plan
- La Vina Specific Plan
- Marina Del Rey Specific Plan
- NBC Universal Evolution Plan: Universal Studios Specific Plan and Guidelines
- Newhall Ranch Specific Plan
- Northlake Specific Plan
- West Carson Transit Oriented District Specific Plan
- Willowbrook Transit Oriented District Specific Plan

Los Angeles County Code

Zoning ordinances must be consistent with a community's general plan and provide detailed requirements to ensure new development fulfills the plan's objectives. The LACC includes the zoning ordinances that apply to the unincorporated areas of Los Angeles County. The LACC also includes other regulations relevant to the proposed Project, such as environmental protection and public health regulations administered by the County's

Department of Public Health (DPH) for commercial cannabis businesses that are located within certain contract cities.[3] A summary of these regulations follows.

- Title 8. Part 7 of Title 8 of the LACC sets forth the requirements for the issuance of a public health permit and the establishment of a fee system for commercial cannabis activities that are subject to State and local laws and regulations relating to public health. The fee system is to ensure that County expenses resulting from the County's inspection and enforcement of public health requirements of commercial cannabis activities within the cities are offset by the fees collected.
- Title 11. Chapter 11.37 of Title 11 sets forth public health regulatory requirements to ensure that commercial cannabis activities are conducted in a manner that protects the health and safety of the consumer and the public.
- Title 12. Title 12 of the LACC sets forth specific regulations regarding environmental protection. The regulations include administrative procedures for the preparation of environmental documents and compliance with the Coastal Act, as well as specific regulations to avoid creating certain nuisances and other adverse impacts associated with topics such as: depositing petroleum products on beaches and in the ocean; noise; dust control; applications of insecticides and pesticides; brush and vegetation removal; wildflower reserve areas; solid waste; environmental health; and hazardous wastes/materials.
- Title 22. Title 22 of the LACC, also known as "Title 22," the "Zoning Ordinance," or the "Zoning Code," sets forth the zoning regulations for the unincorporated areas of Los Angeles County. Title 22 provides a narrative description of the zones that are identified on the County's zoning maps, as well as the purposes, allowed uses, development standards, and entitlements required for uses and physical development allowed or required within each zone shown on the zoning maps. Title 22 also includes and incorporates by reference specific, zoning-related requirements that are provided in the area, community, and specific plans described above. Title 22 includes the zoning regulations that apply to the inland, unincorporated areas of the county, as well as the coastal zoning regulations that serve as the implementing ordinances for the Marina del Rey, Santa Catalina Island, and the Santa Monica Mountains LCPs.

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

As the Metropolitan Planning Organization (MPO) for the region consisting of Imperial County, Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County, Southern California Association of Governments (SCAG) is required by

[3] The Cannabis Compliance & Enforcement Program provides inspections of cannabis facilities to only those cities that have a specific contractual agreement with the Los Angeles County Department of Public Health.

federal law (23 U.S. Code [USC] §§ 134 et seq.) to prepare and update a long-range Regional Transportation Plan (RTP) every four years. The RTP must provide for the development, integrated management, and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area.

In addition, because most areas within the SCAG region have been designated as nonattainment or maintenance areas for one or more transportation-related criteria pollutants under the federal Clean Air Act (42 USC § 7401 et seq.), the RTP must conform to the applicable State Implementation Plan (SIP). The passage of California Senate Bill (SB) 375 in 2008 requires that SCAG prepare and adopt a Sustainable Communities Strategy (SCS) that sets forth a forecasted regional development pattern which, when integrated with the transportation network, measures, and policies, will reduce greenhouse gas (GHG) emissions from automobiles and light-duty trucks and achieve the GHG emissions reduction target for the region set by the California Air Resources Board (CARB) (Government Code § 65080[b][2][B]). In addition, the focus on equity in this Plan supports compliance with Title VI of the Civil Rights Act of 1964 and Environmental Justice guidance at the federal and State levels.

The current Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), also known as "Connect SoCal 2024," fulfills these federal and State mandates and provides a vision for a more resilient and equitable future, with investment, policies, and strategies for achieving the region's shared goals through 2050. Although not a regulatory document, local jurisdictions within the SCAG region must design their general plan housing element updates to be consistent with the priorities of Connect SoCal 2024, which seek to create healthy, prosperous, accessible, and connected communities.

3.5.3 Impact Assessment Methodology

Thresholds of Significance

With respect to land use and planning, Appendix G of the California Environmental Quality Act (CEQA) Guidelines states that a project would normally have a significant impact on the environment if it would:

- Physically divide an established community.
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Conflict with any applicable HCP or NCCP.

In addition to the CEQA Guidelines thresholds stated above, Los Angeles County has a threshold which states that a project would have a significant impact on the environment if it conflicts with the policies of the General Plan related to HMAs or SEAs.

Non-Applicable Thresholds

The Initial Study (IS) prepared for the proposed Project and included as Appendix A to this Program Environmental Impact Report (EIR), preliminarily evaluated the environmental impacts of the proposed Project using the three thresholds stated above.

As stated in the IS, the proposed Project would not have an impact regarding physically dividing an established community given that the proposed Project consists of the adoption of amendments to the LACC (as compared to the implementation of a physical development project) resulting in the establishment of commercial cannabis businesses on properties with existing development (e.g., existing buildings in which activities would be required to occur). Further, the proposed Project does not involve and would not result in the need for the expansion of utilities (see Section 3.7, *Utilities/Service Systems*) and/or infrastructure (e.g., flood control facilities or roadways) that could physically divide an established community.

Similarly, as stated in the IS, the proposed Project would not conflict with an HCP or NCCP, and/or policies or regulations that apply to HMAs or SEAs. The proposed Project would limit commercial cannabis businesses to certain zones located within urban and suburban areas of the unincorporated county. Properties within these zones are not subject to, and do not exhibit the natural resources (e.g., listed species or habitat on which they rely) to qualify for inclusion in, an existing or new HCP or NCCP. In addition, the proposed Project would prohibit commercial cannabis businesses in HMAs and SEAs.

Therefore, the following environmental impact analysis solely evaluates the proposed Project as it relates to conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the proposed Project adopted for the purpose of avoiding or mitigating an environmental effect.

Methodology

As described in Chapter 2, *Project Description,* the proposed Project consists of the adoption of amendments to Titles 8 and 22 of the LACC to license and regulate commercial cannabis business activities in certain unincorporated areas of Los Angeles County. Given that the proposed Project consists of the adoption of a new regulatory program, the proposed Project would not result in direct physical changes to the environment. However, the proposed Project has the potential to produce limited, indirect physical changes to the environment from the resulting establishment and operation of commercial cannabis businesses.

This analysis complies with CEQA Guidelines § 15125(d), which requires that an EIR "…discuss any inconsistencies between the project and applicable general plans and regional plans." Further, decision-makers must make findings of consistency for the proposed Project with respect to the applicable general plan or applicable regional plan policies as part of project consideration. The preliminary determinations regarding the consistency of the proposed Project with these policies are presented in this section for informational purposes to inform

the CEQA analysis only. The Board of Supervisors (Board) would make all final consistency determinations prior to making a decision on the proposed Project. While a preliminary determination of inconsistency with these plans or policies in itself would not constitute an impact on the physical environment, an inconsistency with an adopted plan or policy might suggest that the proposed Project would be conducted in such a way that it could result in an impact to the physical environment. Should the Board determine that the proposed Project is inconsistent with an existing County General Plan or regional plan policy, the proposed Project could not be approved unless measures are identified to eliminate this inconsistency.

This section is based on information from the County's General Plan (e.g., the General Plan Elements, area, community, and specific plans) and other applicable regional plans (e.g., RTP/SCS). Table 3.5-4 and Table 3.5-5 list plans and specific policies that directly relate to the proposed Project and evaluate its consistency with the General Plan based on the features described in Chapter 2, *Project Description,* and the impact analysis and findings presented in other resources areas of this Program EIR. Significant impacts are considered relative to their consistency or inconsistency with applicable policies where a potential inconsistency with a policy that is adopted for the purpose of avoiding or mitigating significant physical environmental impacts might occur.

3.5.4 Environmental Impact Analysis

LUP-1:	The proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Countywide General Plan Policies

The proposed Project is subject to several countywide environmental policies of the Los Angeles County General Plan. The applicable policies are provided below along with an analysis of the Project's consistency with each of them.

As presented in Table 3.5-4, the proposed Project would not result in a significant impact due to a potential conflict or inconsistency with an applicable policy of the County's General Plan. This is largely due to the fact that the proposed Project does not involve any new physical development and any commercial cannabis businesses enabled by the proposed Project would be required to occupy only existing, legally established buildings. Further, under the proposed Project, prior to operating a commercial cannabis business, the operator would be required to obtain approval of a Site Plan Review from the County of Los Angeles Department of Regional Planning (DRP). The purpose of a Site Plan Review is to confirm that a proposed use and/or development of property complies with all applicable rules and policies of the Los Angeles County General Plan, including but not limited to, any applicable area, community, or specific plan requirements, and the zoning regulations set

forth in Title 22 of the LACC. As such, prior to approval of a Site Plan Review, any new (albeit limited) development associated with the establishment of a cannabis business must be found consistent with all applicable policies and development standards adopted by the County for the purposes of avoiding or mitigating an environmental impact. Therefore, impacts related to the consistency of the proposed Project with applicable policies of the County's General Plan are considered *less than significant.*

Table 3.5-4. General Plan Consistency Analysis

General Plan Policy	Consistency Analysis
Land Use Element	
Policy LU 3.1: Encourage the protection and conservation of areas with natural resources, and SEAs.	Consistent. The proposed Project would prohibit commercial cannabis business activities on open space/wildlands, parks/recreational areas, SEAs, HMAs, and Environmentally Sensitive Habitat Areas (ESHAs). Commercial cannabis business activities would be permissible only within commercial, industrial, institutional, and commercial-only mixed-use zones, most of which are located in highly urbanized areas and all of which have existing transportation systems, public utilities, and other services capable of supporting business activities that could result from the proposed Project. Further, commercial cannabis businesses would be required to occupy existing, legally established buildings that are connected to public utilities and services and would require limited development in order facilitate the establishment and operation of a commercial cannabis business.
Policy LU 3.2: Discourage development in areas with high environmental resources and/or severe safety hazards.	
Policy LU 3.3: Discourage development in undeveloped areas where infrastructure and public services do not exist, or where no major infrastructure projects are planned, such as state and/or federal highways.	
Policy LU 4.1: Encourage infill development in urban and suburban areas on vacant, underutilized, and/or brownfield sites.	Consistent. The proposed Project would enable the licensing of commercial cannabis businesses only in existing, legally established buildings located in commercial, industrial, institutional, and commercial-only mixed-use zones that are located in urban and suburban areas of Los Angeles County.
Policy LU 4.2: Encourage the adaptive reuse of underutilized structures and the revitalization of older, economically distressed neighborhoods.	
Policy LU 5.2: Encourage a diversity of commercial and retail services, and public facilities at various scales to meet regional and local needs.	Consistent. The proposed Project would enable the licensing of commercial cannabis business activities that could serve both local and regional customers. As stated above, commercial cannabis businesses would be required to occupy only existing, legally established buildings located in urban and suburban areas of Los Angeles County which have existing multimodal transportation infrastructure and, consequently, would not convert open space, agricultural, or otherwise undeveloped lands thereby leading to urban or suburban sprawl. The proposed Project would allow only industrially related and compatible commercial cannabis uses in industrial zones. Finally, although the proposed Project would not allow commercial cannabis activities in residentially designated areas, many of the zones
Policy LU 5.3: Support a mix of land uses that promote bicycling and walking, and reduce VMTs.	
Policy LU 5.9: Preserve key industrially designated land for intensive, employment-based uses.	

General Plan Policy	Consistency Analysis
Policy LU 5.10: Encourage employment opportunities and housing to be developed in proximity to one another.	in which commercial cannabis activities would be allowed in existing urban and suburban areas in proximity to residential areas.
Policy LU 6.1: Protect rural communities from the encroachment of incompatible development that conflict with existing land use patterns and service standards.	Consistent. As previously described, commercial cannabis activities would be allowed only within commercial, industrial, institutional, and commercial-only mixed-use zones located in established urban and suburban areas of Los Angeles County that have existing public utilities and services. Furthermore, commercial cannabis businesses would be required to occupy existing, legally-established buildings and, consequently, would not involve development that could adversely affect the natural environment and landscape.
Policy LU 6.2: Encourage land uses and developments that are compatible with the natural environment and landscape.	
Policy LU 7.1: Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers, appropriate technology, building enclosure, and other design techniques.	Consistent. As previously described, the proposed Project would allow commercial cannabis businesses only in existing, legally-established buildings located in commercial, industrial, institutional, and commercial-only mixed-use zones compatible with the commercial cannabis business activity. For example, cultivation and volatile manufacturing businesses would only be allowed in industrial zones. Additionally, under the proposed Project, commercial cannabis businesses would be prohibited within 600 feet of a: youth-oriented use, including public or private schools, child day care centers, public libraries, public parks, and public recreational facilities, and licensed game arcades; and Drug Abuse and Recovery Treatment Center. Further, cannabis storefront retail businesses would be prohibited within 500 feet of another cannabis storefront retail business. Finally, as discussed in Chapter 2, *Project Description*, the number of commercial cannabis licenses initially would be limited.
Policy LU 7.2: Protect industrial parks and districts from incompatible uses.	Consistent. Only commercial cannabis activities that are appropriate in industrial zones (e.g., indoor cultivation, manufacturing, and distribution) would occur within industrial parks. Refer to Table 2-1, for the specific list of commercial cannabis activities that would be allowed in industrial zones.
Policy LU 7.3: Protect public and semi-public facilities, including but not limited to major landfills, natural gas storage facilities, and solid waste disposal sites from incompatible uses.	Consistent. As previously described, commercial cannabis business activities would be allowed only in existing buildings located in commercial, industrial, institutional, and commercial-only mixed-use zones. Most of these zones are located in highly urbanized areas, and all of the zones are located in either urban or suburban areas, which are not located within proximity to public and semi-public facilities with which commercial cannabis activities could interfere. Further, the proposed Project does not include the development of housing, assembly uses,

General Plan Policy	Consistency Analysis
	recreational facilities, or other uses that could result in the location of sensitive receptors or large numbers of people within proximity to any such facilities.
Policy LU 7.6: Ensure that proposed land uses located within Airport Influence Areas are compatible with airport operations through compliance with airport land use compatibility plans.	Consistent. Prior to the licensing of a commercial cannabis business, the business operator would be required to obtain approval of a Site Plan Review from the DRP. Prior to approving a Site Plan Review for a commercial cannabis business that would be located within an Airport Influence Area, DRP would be required to confirm that the proposed commercial cannabis business is consistent with any applicable requirements of an applicable airport land use compatibility plan.
Policy LU 7.7: Review all proposed projects located within Airport Influence Areas for consistency with policies of the applicable airport land use compatibility plan.	
Policy LU 9.1: Promote community health for all neighborhoods.	Consistent. As described in the Chapter 2, *Project Description*, the proposed Project includes a number of safeguards that promote community health, offering stronger protections than unlicensed operators. These safeguards include: (1) tested products that are safe and free of harmful contaminants; (2) prohibitions on the establishment of a commercial cannabis business within 600 feet of a: youth-oriented use, including public or private schools, child day care centers, public libraries, public parks, and public recreational facilities, and licensed game arcades; and Drug Abuse and Recovery Treatment Center; (3) a prohibition on the establishment of a cannabis storefront retail business within 500 feet of another licensed cannabis storefront retail business; (4) prohibitions on the consumption of alcoholic beverages and cannabis on licensed premises; (5) limitations on commercial cannabis business advertising; (6) requirements for the maintenance of commercial cannabis premises (e.g., requirements regarding the collection/storage of waste and removal of graffiti); and (7) robust security measures to deter crime on or around the Premises. In contrast, illegal cannabis businesses are not subject to any of these health protections. Finally, the proposed Project includes the establishment of a social equity program to assist prospective business operators that are members of historically disadvantaged communities.
Policy LU 9.4: Encourage patterns of development that protect the health of sensitive receptors.	
Policy LU 9.2: Encourage patterns of development that promote physical activity.	Consistent. The areas in which commercial cannabis businesses would be allowed are located in areas with existing transportation systems, some of which have amenities to facilitate active modes of transportation. For example, cannabis businesses would be allowed in four Transit Oriented District Specific Plans.
Policy LU 10.3: Consider the built environment of the surrounding area and	Consistent. As previously described, the proposed Project would allow the establishment of commercial cannabis businesses only within existing, legally

General Plan Policy	Consistency Analysis
location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.	established buildings and, therefore, physical development would be limited to items such as interior remodels, façade treatments, and the installation of landscaping and signage. Prior to operating a commercial cannabis business, the operator would be required to obtain approval of a Site Plan Review from the Department of Regional Planning. The purpose of a Site Plan Review is to confirm that a proposed use and/or development of property complies with all applicable rules and policies of the Los Angeles County General Plan, including but not limited to, any applicable area, community, or specific plan requirements, and the zoning regulations set forth in Title 22 of the LACC. As such, prior to approval of a Site Plan Review, any new (albeit limited) development associated with the establishment of a cannabis business must be found consistent with the design, scale, architectural style, landscaping, signage, and other development standards of Policies LU 10.3 through 10.6, and Policy LU 10.9.
Policy LU 10.4: Promote environmentally-sensitive and sustainable design.	
Policy LU 10.5: Encourage the use of distinctive landscaping, signage and other features to define the unique character of districts, neighborhoods or communities, and engender community identity, pride and community interaction.	
Policy LU 10.6: Encourage pedestrian activity through the following: • Designing the main entrance of buildings to front the street; • Incorporating landscaping features; • Limiting masonry walls and parking lots along commercial corridors and other public spaces ….	
Policy LU 10.9: Encourage land uses and design that stimulate positive and productive human relations and foster the achievement of community goals.	
Policy LU 11.1: Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies.	Consistent. All cannabis businesses would be within existing buildings and would be required to comply with the County's energy efficiency standards and 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]). 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
Policy LU 11.2: Support the design of developments that provide substantial tree canopy cover, and utilize light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.	

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Policy LU 11.3: Encourage development to optimize the solar orientation of buildings to maximize passive and active solar design techniques.	cannabis activity, would be required to be modified to comply with Title 24 CALGreen standards. In order to obtain a State license, cannabis business operators also would be required to demonstrate compliance with the State Department of Cannabis Control's application renewal requirements and renewable energy requirements. Finally, as part of the consideration of Site Plan Review applications (described above), Department of Regional Planning staff would evaluate and—if found to be feasible—require the incorporation of specific energy conservation and other features of Policies LU 11.1 through 11.3, into the design of commercial cannabis business premises.
Mobility Element	
Policy M 4.15: Reduce vehicle trips through the use of mobility management practices, such as the reduction of parking requirements, employer/institution based transit passes, regional carpooling programs, and telecommuting.	Consistent. The areas in which commercial cannabis businesses would be allowed are located in areas with existing transportation systems, with existing opportunities for multimodal transportation. While the Vehicle Miles Traveled (VMT) analysis prepared by Fehr & Peers for the proposed Project indicates that the operation of commercial cannabis businesses could increase VMT in eligible commercial or industrial areas, particularly for cannabis retail businesses, such increases are not considered to present a conflict with policies of the Mobility Element related to mobility management practices. As part of the consideration of Site Plan Review applications, DRP staff would evaluate and—if found to be feasible—require the incorporation of trip reducing, VMT reducing, and automobile dependence reducing features into cannabis business operations, consistent with Policies M 4.15, M 4.16, M 5.1, and M 5.2.
Policy M 4.16: Promote mobility management practices, including incentives to change transit behavior and using technologies, to reduce VMTs.	
Policy M 5.1: Facilitate transit-oriented land uses and pedestrian-oriented design, particularly in the first-last mile connections to transit, to encourage transit ridership.	
Policy M 5.2: Implement parking strategies that facilitate transit use and reduce automobile dependence.	
Air Quality Element	
Policy AQ 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.	Consistent. As discussed in Section 3.1, *Air Quality*, the proposed Project would not create a significant adverse impact regarding health risks to people from industrial toxic or hazardous air pollutant emissions including, but not limited to, the creation of local hot spots due to a cumulatively considerable increase in traffic congestion at intersections that either are, or are projected to, operate at an unacceptable level

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	of service and which are located within proximity to sensitive receptors. Further, the proposed Project would not place sensitive receptors closer than the minimum distances that CARB, South Coast Air Quality Management District (SCAQMD), and/or Antelope Valley Air Quality Management District (AVAQMD) recommend between Toxic Air Contaminant (TAC) emission sources and sensitive receptors.
Policy AQ 1.2: Encourage the use of low or no volatile organic compound (VOC) emitting materials.	Consistent. As discussed in Section 3.1, *Air Quality*, although the proposed Project would allow volatile manufacturing of cannabis products, the Project will not exceed any VOC-related air emissions standards that apply to the Los Angeles county regional air basins. Further, manufacturers that utilize volatile materials would be required to store, use, and dispose of materials that emit VOCs in accordance with applicable SCAQMD and AVAQMD requirements.
Policy AQ 1.3: Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.	Consistent. Given that commercial cannabis businesses resulting from the proposed Project would be required to be located in existing, legally permitted buildings and structures, the proposed Project will result in limited construction, grading, other ground disturbance activities, and/or demolition that could produce substantial particulate, inorganic, and/or biological emissions. However, if a commercial cannabis activity has the potential to generate dust, it would be subject to SCAQMD and AVAQMD Rule 403 requiring the implementation of best available control measures (BACM) during active operations capable of generating fugitive dust. Rule 403 requires those who are responsible for activities defined as "large operations" to notify the SCAQMD by submitting specific forms.[4] Rule 403.1 requires a Fugitive Dust Control Plan approved by the SCAQMD or an authorized local government agency prior to initiating any construction/earth-moving activity that involves 5,000 or more square feet of surface area disturbance. Finally, any ground disturbance activities unassociated with approved construction activities and involving over 2.5 acres of disturbance would be subject to the dust control requirements of LACC, Chapter 12.32, Control of Hazardous Dust Conditions.

[4] A "large operation" is defined as any active operation on property containing 50 or more acres of disturbed surface area; or any earth moving operation with a daily earth-moving or throughput volume of 3,850 cubic meters (5,000 cubic yards), three times during the most recent 365 day period.

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Policy AQ 2.5: Encourage land use development and design that integrates GHG emission reduction strategies through increasing residential density and infill development, especially affordable housing and diversity of destinations near High-Quality Transit Areas.	Consistent. As previously described, commercial cannabis businesses would be allowed only in existing, legally permitted buildings that are located within commercial, industrial, institutional, and commercial-only mixed-use zones. The zones in which commercial cannabis businesses would be allowed are located within urban and suburban areas, within proximity to existing residential development and existing transportation systems with multimodal forms of transportation.
Policy AQ 3.2: Reduce energy consumption in existing buildings and County operations through energy efficiency retrofits.	Consistent. As stated above, all cannabis businesses would occupy existing buildings and would be required to comply with the: County's energy efficiency standards and 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]); California Title 24 Building Code energy efficiency standards for development of all types, including efficiency standards for electrical and natural gas energy systems; Title 24 CALGreen standards; and DCC's application renewal requirements and renewable energy requirements. The proposed Project does not include development standards or other requirements that would interfere with the installation of solar facilities if a cannabis business operator proposes to install them.
Policy AQ 3.6: Support local solar power generation on new and existing buildings and parking lots.	
Conservation and Natural Resources Element	
Policy C/NR 6.2: Protect natural groundwater recharge areas and regional spreading grounds.	Consistent. The proposed Project would allow commercial cannabis businesses solely within commercial, industrial, institutional, and commercial-only mixed zones that are located within urban and suburban areas that are not characterized by hazardous slopes. The limited amount of new development resulting from the proposed Project in these areas is unlikely to substantially adversely affect groundwater recharge areas, regional spreading grounds, or groundwater that is used for drinking water. In addition, new development must comply with: (1) the National Pollutant Discharge Elimination System (NPDES) 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).
Policy C/NR 6.5: Prevent stormwater infiltration where inappropriate and unsafe, such as in areas with high seasonal groundwater, on hazardous slopes, within 100 feet of drinking water wells, and in contaminated soils.	

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Policy C/NR 8.1: Protect [Agricultural Resources Areas] … and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, from encroaching development and discourage incompatible adjacent land uses.	Consistent. Commercial cannabis businesses would be allowed within commercial, industrial, institutional, and commercial-only mixed-use zones that do not have, and are not located within proximity to, lands that are designated as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation. Further, given that cannabis businesses must be located within existing buildings and new physical development would be limited to interior remodels, building renovations, and installation of accessory structures (e.g., signage), development activities are unlikely to adversely affect the agricultural operations on agricultural lands.
Policy C/NR 8.2: Discourage land uses in ARAs, and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, that are incompatible with agricultural activities.	
Policy C/NR 12.1: Encourage the production and use of renewable energy resources.	Consistent. The proposed Project would not include development standards or other requirements that could interfere with commercial cannabis business operators' options to utilize renewable energy resources. All licensed commercial cannabis businesses would be required to comply with the renewable energy requirements of the CCR (Title 4, Division 19, Chapter 7, Article 2, § 16305).
Policy C/NR 13.1: Protect scenic resources through land use regulations that mitigate development impacts.	Consistent. The proposed Project would allow commercial cannabis businesses solely within commercial, industrial, institutional, and commercial-only mixed-use zones that are located within urban and suburban areas that do not exhibit scenic resources. Further, commercial cannabis businesses would be required to be located in existing, legally permitted buildings thereby resulting in limited, new physical development associated with accessory structures (e.g., new signage and lighting). Any new development would be subject to existing regulations and policies regarding maximum height, size, location, and other features that would prevent development that could adversely affect viewsheds that afford views of scenic resources.
Policy C/NR 13.6: Prohibit outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas.	Consistent. The proposed Project does not include amendments that would relax this policy prohibiting outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas. Proposed amendments to the LACC to allow commercial cannabis businesses require that all signage and advertising at commercial cannabis businesses would be required to comply with the existing

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	requirements of LACC Chapter 22.114 (Signs) and existing prohibitions on billboards set forth in the LACC. Further, cannabis advertising would be prohibited on any interstate or State highway crossing the California border.
Policy C/NR 13.8: Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.	Consistent. The proposed Project would prohibit commercial cannabis businesses within HMAs and, therefore, would not have the potential to adversely affect natural and scenic resources, or create risks associated with hazards from development within HMAs.
Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.	Consistent. Commercial cannabis activities would be required to be located in existing constructed and permitted structures in commercial-only mixed-use, institutional, and industrial zones within the county. Implementation of the Project would facilitate only limited physical site alterations (e.g., interior remodeling, landscaping, signage, and/or painting). Therefore, development activities that could result from the proposed Project are unlikely to involve substantial grading or other ground disturbance activities in areas that have not been previously disturbed and have the potential to exhibit substantial, subsurface archaeological or tribal cultural resources. Furthermore, for any development requiring a planning approval, coastal development permit, geological / geotechnical exploratory excavation permit, sewer permit, building permit, and/or, grading permit, the Planning Director may require the preparation of a Cultural Resource Review pursuant to LACC § 22.44.1570 et seq if the proposed development has the potential to adversely affect an "Important Cultural Resource," as defined in Subsection 22.44.1570.B of the LACC, and implement contingency measures to protect any resources that are known or might be discovered during development. In the unlikely event that a constructed and permitted structure proposed for cannabis use is a designated historic site, any licensed 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.
Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.	
Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.	
Noise Element	
Policy N 1.2: Reduce exposure to noise impacts by promoting land use compatibility.	Consistent. Cannabis activities only would be allowed within existing, legally-permitted structures, would not be allowed within residential zones, and would be

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Policy N 1.6: Ensure cumulative impacts related to noise do not exceed health-based safety margins.	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.
Safety Element	
Policy S 3.1: Strongly discourage development in the County's Flood Hazard Zones, unless it solely provides a public benefit.	Consistent. The proposed Project would allow commercial cannabis businesses solely within commercial, industrial, institutional, and commercial-only mixed-use zones that are located within urban and suburban areas, and it is unlikely that the proposed Project would indirectly result in new development that includes substantial amounts of new, impervious surfaces. However, if a commercial cannabis business includes substantial site alterations, the design of the development would be required to comply with the following (as applicable): (1) the NPDES Permit for the Municipal Separate Storm Sewer System (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). Any commercial cannabis businesses that would be located within a Federal Emergency Management Agency (FEMA)-designated flood hazard area, the business operator would be required to demonstrate compliance with requirements of the 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). Further, 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
Policy S 3.6: Infiltrate development runoff on-site, where feasible, to preserve or restore the natural hydrologic cycle and minimize increases in stormwater or dry weather flows.	

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	with the requirements of a Flood Control District Permit, thereby avoiding such hazards.
Public Services and Facilities Element	
Policy PS/F 1.1: Discourage development in areas without adequate public services and facilities.	Consistent. The proposed Project would limit new commercial cannabis businesses to existing, developed lots located in commercial, industrial, commercial-only mixed-use, and institutional zones, which are located in suburban and urban areas. These areas have existing public services and facilities, including services regarding water, sewer, solid waste, law enforcement, fire services, emergency response, and transportation/circulation systems that facilitate multiple modes of transportation. If redevelopment, restoration, and or remodeling of an existing building, structure, or site will increase demand for public services, commercial cannabis businesses would be required to: (1) install, or pay for the installation of, the new facilities; or (2) if an impact mitigation fee program is available, pay the business' pro-rata share to offset its impacts to public facilities and/or services (e.g., transportation infrastructure).
Policy PS/F 1.2: Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.	
Policy PS/F 2.1: Support water conservation measures.	Consistent. In order to obtain a State license, cannabis cultivators would be required to comply with State Water Resources Control Board's (SWRCB's) *Cannabis Cultivation Policy*, Water Conservation and Use Term No. 97 that requires cannabis cultivators to implement water conserving irrigation methods (e.g., drip or trickle irrigation, micro-spray, or hydroponics). In addition, any new development associated with the establishment of a commercial cannabis business would be required to comply with applicable LACC water conservation requirements (e.g., water conservation standards that apply to certain specific plan areas).
Policy PS/F 3.2: Support the increased production, distribution and use of recycled water, gray water, and rainwater harvesting to provide for groundwater recharge, seawater intrusion barrier injection, irrigation, industrial processes and other beneficial uses.	
Policy PS/F 5.5: Reduce the County's waste stream by minimizing waste generation and enhancing diversion.	Consistent. 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 CCR, Title 22, Division 4.5, Chapter 11, which are used or generated during operation of a commercial cannabis business, must be
Policy PS/F 5.7: Encourage the recycling of construction and demolition debris generated by public and private projects.	
Policy PS/F 5.8: Ensure adequate and regular waste and recycling collection services.	

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	managed and disposed in accordance with State regulations at a permitted hazardous waste receival / disposal facility. For certain commercial cannabis businesses (e.g., processors), cannabis waste must also be managed consistent with licensing requirements of the DCC.
Policy PS/F 6.8: Encourage projects that incorporate onsite renewable energy systems.	Consistent. As described in the analysis of energy-related impacts in Section 3.2, *Energy*, all future commercial cannabis operations would be required to comply with the applicable requirements of the Los Angeles County 2045 Climate Action Plan (CAP), California Building Code (CBC), CALGreen Code, and LACC (Title 26); operators would be required to demonstrate compliance with applicable requirements prior to obtaining a local license. Commercial cannabis businesses would receive renewable energy, similar to other businesses in the unincorporated areas of the county that have been receiving renewable energy since at least October 2022. In addition, certain commercial cannabis businesses would be required to comply with applicable Public Utilities Code energy efficiency requirements. For example, indoor cultivation licensees would be required to limit electricity usage so that it does not exceed the average electricity GHG emissions intensity required by their local utility provider (e.g., Southern California Edison [SCE]) pursuant to the California Renewables Portfolio Standard Program of the Public Utilities Code (Title 4, Division 19, Chapter 7, Article 2, § 16305(a), Renewable Energy Requirements). If the licensed cultivator's average weighted GHG emissions intensity is greater than the local utility provider's GHG emissions intensity, the licensee would be required to obtain carbon offsets to cover the excess carbon emissions from the previous annual licensed period (Ibid, § 16305[b], Renewable Energy Requirements). Other requirements listed within Title 4 apply to generator usage, water source information, cultivation plans, etc.
Economic Development Element	
Policy ED 2.2: Utilize adequate buffering and other land use practices to facilitate the compatibility between industrial and non-industrial uses.	Consistent. As described in Chapter 2, *Project Description*, the proposed Project would allow only industrially compatible commercial cannabis businesses activities (e.g., indoor cultivation, and volatile and nonvolatile manufacturing) in industrial zones. Further, commercial cannabis businesses would be prohibited within 600 feet of a: youth-oriented use, including public or private schools, child day care centers, public libraries, public parks, and public recreational facilities, and licensed game arcades; and/or Drug Abuse and Recovery Treatment Center.
Policy ED 2.3: Ensure environmental justice in economic development activities.	Consistent. The proposed Project would amend Title 8 of the LACC to establish a social equity program that would be implemented as part of the County's business

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	licensing regulations, to assist prospective business operators that are members of historically disadvantaged communities.
Policy ED 2.4: Ensure high standards of development and encourage environmentally sustainable practices in economic development activities.	Consistent. As stated above, the State licensing requirements for commercial cannabis activities include a number of environmental standards with which licensees must comply to obtain and renew their State license(s) and remain in operation. These standards include but are not limited to requirements regarding water conservation, water quality, solid waste reduction, and energy conservation/GHG reduction measures. In addition, the Title 22 amendments would include requirements regarding maintenance of sites to be free of trash, debris, junk, and salvage and graffiti visible from public viewing locations. Finally, commercial cannabis business activities would be required to comply with applicable, existing requirements of the LACC and General Plan including, but not limited to, policies of the area, community, and specific plans.
Policy ED 2.5: Encourage employment opportunities to be located in proximity to housing.	Consistent. Although the proposed Project would not allow commercial cannabis activities in residentially designated areas or on property that includes a dwelling unit, many of the zones in which commercial cannabis activities would be allowed are located in existing urban and suburban areas and within proximity to residential areas. In addition, commercial cannabis activities would be allowed in commercial-only mixed-use zones in proximity to housing. Finally, the proposed Project would also amend Title 8 of the LACC to establish a hiring mandate that will encourage hiring residents that live within 5 miles of the business Premises.
Policy ED 2.8: Incentivize as much as feasible, environmentally sustainable practices and high standards of development in the communities that bear disproportionate pollution and health impacts.	Consistent. As previously described, all commercial cannabis businesses—regardless of their location in relation to disadvantaged communities—would be subject to State licensing and Los Angeles County licensing requirements that would avoid activities that would create substantial pollution and/or compromise public health. Refer also to the discussion of potential air quality impacts in Section 3.1, *Air Quality.*
Policy ED 4.4: Incentivize infill development in urban and suburban areas that revitalizes underutilized commercial and industrial areas.	Consistent. As previously described, the proposed Project would require commercial cannabis businesses to be located solely in existing, legally permitted buildings on property within commercial, industrial, institutional, and commercial-only mixed-use zones, all of which are located in urban and/or suburban areas. It is likely that at least certain sites will require a limited amount of new development such as remodels/renovations of existing buildings, new façade treatments, signage, and landscaping. Any new development would be required to comply with the current, applicable regulations of the LACC and goals and policies of the
Policy ED 4.6: Retrofit and reuse vacant and underutilized industrial and commercial sites in urban and suburban areas for emerging and targeted industries.	

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	General Plan including, but not limited to, those in applicable area, community, and specific plans.

Los Angeles County Area, Community, and Specific Plans

As described in Chapter 2, *Project Description*, and Section 3.5.2, *Regulatory Setting*, the Los Angeles County General Plan includes, or is complemented by, area/land use plans, community plans, and specific plans that the County has adopted for certain locales within the unincorporated areas of the county. These plans provide area-, community-, neighborhood-, and/or parcel-specific goals, policies, regulations, and/or implementation programs that are intended to capitalize on a locale's unique sense of place; protect and/or enhance resources; provide needed public services, utilities, and/or infrastructure; provide flexibility in zoning requirements; and/or further the implementation of other land use and/or planning priorities identified in these plans. The plans share similarities with one another and the countywide goals, policies, regulations, and/or implementation programs, but differ regarding certain environmentally related requirements.

As stated above, licensed cannabis businesses must undergo a site plan review process and, if physical development warrants issuance of a building permit pursuant to the LACC, the County would be required to review and approve an application for the requisite building permit(s). Prior to approving a ministerial site plan review, the County must find that the physical development and/or use of the subject property complies with all applicable sections of the LACC, which includes specific requirements for development and/or use of properties that are located within areas that are subject to a specific plan. Further, pursuant to LACC § 22.02.050.B.1, the County may issue a building permit "…only for those land uses that are allowed through zoning and deemed compatible with the general intended uses of the land use designation in the General Plan, or an applicable Area, Community, or Neighborhood Plan."

Table 3.5-5 identifies the environmental topics addressed in the area/land use and specific plans that include zone districts in which commercial cannabis activities would be permissible. The proposed amendments to the LACC are consistent with the plans' applicable environmental goals, policies, development standards, zoning regulations, and/or programs. Further, prior to approval of an application for a site plan review and, if required, building permit application(s) for each cannabis business, County staff would review the application(s) to confirm that the proposed cannabis business would comply with applicable requirements of the plans—if not, either the business operator would be required to revise the cannabis business application to comply with the requirements, or the application(s) would be denied, licenses would not be issued, and the cannabis business could not operate.

Table 3.5-5. Environmental Topics Addressed in Applicable Area/Land Use Plans and Specific Plans

Area, Community, or Specific Plan	Environmental Topic									
	Aesthetics / Scenic Resources	Agriculture	Air Quality	Biological Resources	Cultural Resources	Energy	Geology & Soils	GHGs	Hazards & Hazardous Materials	Hydrology / Water Quality
Area / Land Use Plan										
Antelope Valley Area Plan	X	X	X	X	--	X	X	--	X	X
East San Gabriel Valley Area Plan	X	X	X	X	X	--	--	--	X	X
Gateway Planning Area Rezoning Plan	No Applicable Requirements									
Marina del Rey Land Use Plan & Specific Plan	X	--	--	X	X	X	X	X	X	--
Metro Area Plan	X	--	X	--	X	--	--	--	X	--
Santa Clarita Valley Area Plan	X	X	X	X	X	X	X	X	X	X
Santa Monica Mountains Land Use Plan	X			X	X	--	X	X	X	--
Santa Monica Mountains North Area Plan	X	X	--	X	X	--	X	X	X	--
South Bay Area Plan	X	--	--	--	X	--	--	--	X	--
West San Gabriel Valley Area Plan	X	X	X	X	X	--	X	X	X	X
Westside Area Plan	X	--	--	X	X	X	X	--	X	--
Specific Plans										
Connect Southwest LA Specific Plan	X	--	--	--	--	--	--	--	--	--
East Los Angeles 3rd Street Specific Plan	X	--	--	--	X	--	--	--	--	X
Florence-Firestone Transit Oriented District Specific Plan	--	--	--	--	X	--	--	X	--	X
Newhall Ranch Specific Plan	X	X	X	X	X	X	X	--	X	X
Northlake Specific Plan	X	--	--	X	--	--	--	--	X	--
West Carson Transit Oriented District Specific Plan	X	--	--	--	--	--	--	--	--	--
Willowbrook Transit Oriented District Specific Plan	X	--	--	--	--	X	--	--	--	--

Table 3.5-5. Environmental Topics Addressed in Applicable Area/Land Use Plans and Specific Plans (Cont.)

Area, Community, or Specific Plan	Environmental Topic								
	Land Use / Planning	Mineral Resources	Noise	Population / Housing	Public Services	Recreation	Transportation / Mobility	Utilities / Service Systems	Wildfire
Area / Land Use Plan									
Antelope Valley Area Plan	X	X	--	X	X	X	X	X	X
East San Gabriel Valley Area Plan	X	--	X	--	X	X	X	X	X
Gateway Planning Area Rezoning Plan	No Applicable Requirements								
Marina del Rey Land Use Plan & Specific Plan	X	--	--	--	--	X	X	X	--
Metro Area Plan	X	--	X	X	--	--	X	--	--
Santa Clarita Valley Area Plan	X	X	X	X	X	X	X	X	X
Santa Monica Mountains Land Use Plan	X	--	X	X	X	X	X	X	X
Santa Monica Mountains North Area Plan	X	--	X	X	X	X	X	X	X
South Bay Area Plan	X	--	--	--	X	X	X	X	--
West San Gabriel Valley Area Plan	X	X	X	X	X	X	X	X	X
Westside Area Plan	X	--	--	--	X	X	X	X	X
Specific Plans									
Connect Southwest LA Specific Plan	X	--	--	X	X	X	X	X	--
East Los Angeles 3rd Street Specific Plan	X	--	--	X	X	X	X	X	--
Florence-Firestone Transit Oriented District Specific Plan	X	--	--	X	X	--	X	X	--
Newhall Ranch Specific Plan	X	X	X	X	X	X	X	X	X
Northlake Specific Plan	X	--	X	X	X	X	X	X	X
West Carson Transit Oriented District Specific Plan	X	--	--	--	X	X	X	X	--
Willowbrook Transit Oriented District Specific Plan	X	--	X	X	X	X	X	X	--

SCAG Connect SoCal 2024 RTP/SCS

As described above, in 2024 SCAG adopted Connect SoCal 2024 that serves as the current RTP/SCS for the SCAG region that encompasses Los Angeles County. Connect SoCal 2024 describes a number of transportation investments that SCAG intends to undertake, the forecasted development pattern for the region, and regional planning policies and implementation strategies. Although Connect SoCal 2024 is not a regulatory document, Project inconsistency with polices of the Connect SoCal 2024 could compromise the fulfillment of the environmental related goal(s) and/or program(s) thereby creating a potentially significant, adverse environmental impact. Table 3.5-6 provides the applicable goals and policies from Connect SoCal 2024 and a preliminary analysis of consistency for the proposed Project.

As summarized therein, the proposed Project is not considered to result in a potential inconsistency with any applicable goal or policy of Connect SoCal 2024. This is largely because the proposed Project would not involve any change in the designation or zoning of any parcels nor does the proposed Project involve amendments that would allow for a greater degree of development than is currently allowed. Further, the proposed Project is not considered to substantially induce growth which would exceed the land use and growth assumptions upon which the goals and policies of Connect SoCal 2024 are based. Therefore, impacts would be *less than significant*.

Table 3.5-6. Connect SoCal 2040 RTP/SCS Consistency Analysis

Prediction, Goal, or Policy	Consistency Analysis
Regional Growth Projection (Table 3.1): *Connect SoCal 2040 sets forth 30-year regional growth projections for Los Angeles County.*	Consistent. The proposed Project would allow commercial cannabis activities in eligible zone districts in the unincorporated county. Licensed 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 could increase employment opportunities and temporary visitors. However, the potential for these commercial activities to result in indirect growth inducement is limited, given that growth inducement from the establishment of new businesses 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, the proposed Project is not anticipated to cause an increase in population that exceeds the projections for Los Angeles County on which Connect SoCal 2040 are based.
Environment Goal: Create a healthy region for the people of today and tomorrow • Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change • Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse	Consistent. The proposed Project is not anticipated to result in new development that is inconsistent with the climate change-related objectives of SoCal Connect 2024. As described in Section 3.2, *Energy*, Section 3.3, *Greenhouse Gas Emissions*, and Section 3.6, *Transportation*, the proposed Project is not anticipated to result in wasteful or inefficient energy consumption or produce a significant amount of GHGs. While certain uses enabled under the Project have the potential to generate VMT in excess of County thresholds, in the context of trip generation resulting from existing land use designations and zoning regulations as well as regional trip generation anticipated in the SCAG RTP/SCS, these operational impacts would be negligible. In addition, the proposed Project would involve the imposition of water conservation,

Prediction, Goal, or Policy	Consistency Analysis
gas emissions and enable more sustainable use of energy and water • Conserve the region's resources	water quality, and energy conservation/renewable energy requirements on applicable new physical development associated with commercial cannabis businesses that could result from the proposed Project. Further, as described in Section 3.1, *Air Quality,* the proposed Project will not exceed any of the ambient air quality standards that apply to the region.
Sustainable Development: Sustainable development supports quality of life and economic growth for the region's present and future populations by ensuring that essential resources, such as water, energy and food supply, are responsibly managed. This enables current and future generations to thrive amidst both forecasted and unforeseen challenges.	Consistent. As described in Section 3.2, *Energy* and Section 3.7, *Utilities/Service Systems*, the proposed Project will not result in wasteful or unsustainable consumption of energy supplies from nonrenewable sources; sufficient water supplies exist to serve the proposed Project; or compromise food supply. Commercial cannabis activities would be subject to water conservation, water quality, and renewable energy resource requirements set forth in the LACC, General Plan, and State licensing rules for certain commercial cannabis businesses (e.g., indoor cultivation). Further, commercial cannabis businesses would only be allowed on commercial, industrial, institutional, and commercial-only mixed-use properties and, therefore, would not convert food crops to cannabis crops on agricultural designated lands. Further, although development associated with commercial cannabis businesses that the proposed Project would allow would be limited, development activities within proximity to agricultural-designated lands which have the potential to adversely affect food crop production, would be subject to a number of requirements to minimize or avoid such impacts (e.g., dust control for grading activities and demonstration of a sustainable water supply for indoor cultivation).
Air Quality: Transportation, especially the goods movement sector, contributes the overwhelming majority of air pollutant emissions that cause ozone pollution. A comprehensive and coordinated regional solution with integrated land use and transportation planning from all levels of governments will be required to achieve the needed emission reductions.	Consistent. As stated in Section 3.1, *Air Quality*, and Section 3.6, *Transportation*, the proposed Project will not result in a significant air quality impact due to emissions that exceed a cumulative threshold for the Air Basins in which commercial cannabis would be allowed. While the VMT analysis prepared by Fehr & Peers for the Project indicates that the operation of commercial cannabis businesses could increase VMT in eligible commercial or industrial areas, particularly for cannabis retail businesses, neither the proposed Project nor the potential increases in VMT resulting from its implementation are considered to present a conflict with or interfere with regional coordination plans and programs for achieving emissions reductions. Finally, as stated above, the proposed Project would not result in wasteful energy consumption the production, storage, and/or transmission of which would result in a significant impact due to GHG emissions.
Clean Transportation: Transitioning to cleaner vehicles, both [*sic*] transit fleets,	Consistent. Nothing in the proposed Project would prevent, prohibit, or otherwise impede: (1) the use of cleaner vehicles for employees and/or customers associated

Prediction, Goal, or Policy	Consistency Analysis
trucks and passenger vehicles, is important for supporting cleaner air quality. This requires ensuring the availability of these new technologies but also a regional charging or refueling infrastructure to support cleaner vehicles.	with the commercial cannabis uses that would result from the proposed Project; and/or (2) the establishment of regional charging or refueling infrastructure for cleaner vehicles.
Natural and Agricultural Land Preservation: Preserving natural and agricultural lands can strengthen our communities, improve essential resources like our air, water and food, protect and enhance biodiversity, provide economic benefits and capture greenhouse gases instead of allowing them to concentrate in the atmosphere.	Consistent. As stated above, the proposed Project would continue to prohibit commercial cannabis businesses on open space/wildlands, agricultural lands, or other areas subject to resource conservation and/or preservation standards (e.g., SEAs or ESHAs), thereby impeding their use (e.g., food crop production) or purposes (e.g., conserving Prime agricultural lands or ecosystem functions). In addition, as described elsewhere in this Program EIR and the IS prepared for the proposed Project, the proposed Project would not result in a significant impact regarding air quality, climate change, water quality, and/or water supply.
Climate Resilience: The critical issues and challenges presented by climate change require planning beyond the borders of a single city or county. Effective emergency response to large wildfires, for example, requires coordination amongst multiple agencies and local jurisdictions. Climate change's adverse impacts on the natural, social, economic and built environment—including transportation systems—can disrupt quality of life in an acute as well as steadily declining fashion. This issue can be most effectively addressed through regional coordination and solutions finding.	Consistent. The proposed Project would allow commercial cannabis businesses in existing, legally permitted buildings within urban and suburban areas of the county and, therefore, would not involve substantial new physical development or the placement of large numbers of humans in wildlands, the wildland urban interface, and/or other areas that experience high fire hazards. Further, as described above, 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. Any development required to alter a site to facilitate the establishment and operation of a commercial cannabis business 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,

Prediction, Goal, or Policy	Consistency Analysis
	Americans with Disabilities Act (ADA) of 1990 accessibility, remodels of existing buildings, etc. As described above, the proposed Project is unlikely to result in substantial new development within areas that are prone to flooding, landslides, or debris flows that climate change will exacerbate. Commercial cannabis businesses would be limited to existing, developed lots within urban or suburban commercial, industrial, institutional, and commercial-only mixed-use zones, where infrastructure, law enforcement, and emergency response services currently exist. Therefore, the proposed Project is unlikely to impede regional coordination and/or solutions finding regarding climate adaptation and resilience.

3.5.5 Cumulative Impacts

As discussed in Chapter 3, *Environmental Impact Analysis*, of this Program EIR, projects included in the analysis of cumulative impacts involve legislative actions (as compared to physical development projects) similar to the proposed Project, such as: the adoption of, and amendments to, the LACC to implement State housing legislation; the adoption of programs, ordinances, and plans to conserve resources and address hazards (e.g., the Los Angeles County Oak Tree Program, the Historic Highlands Historic District Ordinance, and the Community Wildfire Protection Ordinance and Protection Plan); and new area plans (e.g., San Fernando Valley Area Plan and South Bay Area Plan).

For the projects involving amendments to the LACC or the adoption of a specific plan, the Los Angeles County Board of Supervisors must find that the ordinance or specific plan will be consistent with the Los Angeles County General Plan prior to approving them (California Government Code §§ 65450 and 65860). Similarly, prior to approving any amendments to, or programs to implement, the Los Angeles County General Plan, the Los Angeles County Board of Supervisors must find that they will be consistent with other elements and components of the General Plan (Ibid, § 65300.5[a]). Therefore, the projects included in the analysis of cumulative impacts must be consistent with applicable components of the General Plan—including, but not limited to, environmentally related policies and programs. If a project would be inconsistent with an environmentally related policy, the Board of Supervisors must deny the project and, consequently, the project would not result in a significant environmental impact due to the inconsistency with the environmentally related policy.

Given that the proposed Project involves the adoption of amendments to the LACC, it is also subject to the same general plan policy consistency requirements that apply to other projects included in the analysis of cumulative impacts. As stated in the policy consistency analysis above, the Project would be consistent with all applicable land use plans, policies, and programs that have been adopted for the purpose of protecting the physical environment. Therefore, the proposed Project does not have the potential to make a cumulatively considerable contribution to a significant, cumulative impact involving noncompliance with a County plan, policy, or program that has been adopted for the purpose of protecting the physical environment.

In contrast to the County's General Plan and other environmentally related regulatory planning requirements, the SCAG Connect SoCal 2024 RTP/SCS is not a regulatory document, but rather a program that informs investment strategies for, and prioritizes, regional transportation projects. As described above, the proposed Project would not involve population growth or housing development that—either by itself or in combination with other projects—would cause an exceedance of the regional forecasts provided in Connect SoCal 2024. Further, although other projects included in the analysis of cumulative impacts might be inconsistent with environmental goals of Connect SoCal 2024, the proposed Project would be consistent with all applicable goals and, therefore, does not

have the potential to make a cumulatively considerable contribution to a significant cumulative impact involving other projects' non-compliance with an environmentally related aspect of Connect SoCal 2024.

3.5.6 Mitigation Measures

The Project would result in *less than significant* impacts regarding land use and planning. Therefore, no mitigation measures are required.

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3.6 TRANSPORTATION

Environmental impacts to transportation may arise from increased vehicle trips and changes in travel patterns associated with the operation of commercial cannabis businesses that could be permitted under the proposed Project. A significant transportation impact would occur if the establishment of these businesses conflicts with applicable transportation plans or policies, substantially increases vehicle miles traveled (VMT), creates new hazards due to roadway design or incompatible uses, or result in inadequate emergency access. Minor renovation activities necessary to establish a commercial cannabis business under the proposed Project could temporarily increase vehicle trips due to materials delivery and/or construction worker commutes, but these impacts would be limited in duration and scope. Operational impacts related to transportation plan consistency, roadway design or incompatible use hazards, or emergency access would therefore be less than significant. With respect to the Project's consistency with California Environmental Quality Act (CEQA) Guidelines Section 15064.3(b) and impacts related to VMT, while some individual commercial cannabis businesses licensed under the Project may fall below the County's screening criteria and result in a less than significant VMT impact, not all future projects are guaranteed to do so. Because project-specific information is not available for future cannabis businesses that may be licensed under the Project, it is possible that individual businesses may exceed the County's VMT screening criteria either due to their location, operational characteristics, size, or average daily trip rates, and result in a significant VMT impact. Implementation of required mitigation measure requiring transportation demand management (TDM) strategies would reduce VMT generated by commercial cannabis businesses; however, mitigation that could feasibly reduce Project VMT impacts to a less than significant level are not available. The Project would result in a significant and unavoidable impact with respect to CEQA Guidelines Section 15064.3(b).

This section describes potential transportation and traffic impacts from implementation of the Commercial Cannabis Business Licensing Program (Project) and mitigation measures to reduce identified impacts where possible. It includes a discussion of the existing traffic conditions in Los Angeles County's (County's) unincorporated regions, as well as the applicable regulations pertaining to the proposed Project. Where applicable, this section addresses development standards included in the proposed Project which may address transportation impacts. As the proposed Project is a countywide ordinance that would allow commercial cannabis activity in certain areas located throughout the unincorporated county, this section analyzes impacts at a programmatic level. Where available, data on existing conditions along key road corridors is provided along with a discussion of possible proposed Project impacts, along with a more programmatic discussion of alternative transportation, such as transit and bicycles.

As described in Chapter 2, *Project Description* and Section 3.5, *Land Use and Planning*, the County is divided into 11 community/planning areas for planning purposes. The road networks within these planning areas vary significantly, with a low density of roads and limited connectivity in more rural and agricultural areas in the northern part of the County, and greater degrees of road development in more urban areas in the south. The road network ranges from rural two-lane roads to larger state highways, as well as U.S. Highway 101 (US-101), all with differing levels of traffic volumes, congestion and physical road conditions. Information in this section was derived from the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Mobility Element of the County's Comprehensive Plan, County Community Plans, California Public Roads Data, and California Department of Transportation (Caltrans) District 5.

A summary of the impacts related to transportation identified in this section is provided in Table 3.6-1.

Table 3.6-1. Transportation Summary of Impacts

Transportation Impacts	Mitigation Measures	Impact Classification
Impact TR-1. The proposed Project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	None required	Less than significant
Impact TR-2. The proposed Project would potentially conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b).	MM TR-1. Transportation Demand Management Strategies	Significant and unavoidable
Impact TR-3. The proposed Project would not substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment).	None required	Less than significant
Impact TR-4. The proposed Project would not result in inadequate emergency access.	None required	Less than significant
Cumulative Impacts	None required	Less than significant

3.6.1 Environmental Setting

Existing Transportation Network

The transportation network within the County consists of approximately 3,100 miles of maintained public roadways in unincorporated areas, approximately 800 miles of Class I, II,

and III bikeways, public transit service systems such as the Los Angeles County Metropolitan Transportation Authority (Metro), Metrolink, dozens of municipal bus operators (Santa Monica Big Blue Bus, Culver CityBus, Foothill Transit, Long Beach Transit, Montebello Bus Lines, Torrance Transit, etc.) and dozens of private transportation services, three railroad operators, 15 public airports, and two main harbor facilities. These facilities provide for the transport of people and goods throughout the region. The following section provides an overview of the components of the transportation network (Los Angeles County Department of Regional Planning 2016).

The six-county SCAG region has about 53,400 road miles traversing incorporated and unincorporated areas, 1,630 miles of which are interstate and freeway type. Sections of Interstate (I-) 710, I-605, State Route (SR-) 60, and SR-91 carry the highest volumes of truck traffic in the region, averaging over 340,000 trucks per day (Caltrans 2023). Other major components of the regional highway network also serve significant numbers of trucks, including I-5, I-10, I-15, and I-210, with some sections carrying over 20,000 trucks per day. These roads carry a mix of local, domestic trade, and international cargoes. The arterial roadway system also plays a critical role, providing "last mile" connections to the ports, manufacturing facilities, intermodal terminals, warehouses, and distribution centers.

Federal and State Freeways, Routes, and Highways

The highway network is comprised of the State Highway System, which consists of 915 freeway and highway miles, and includes U.S. Interstate freeways and state-maintained freeways and highways, High Occupancy Vehicle lanes, and county and city highways. Caltrans is the state agency responsible for the maintenance of freeways and highways. Caltrans estimates that on average there are more than 100 million vehicle miles traveled per day in Los Angeles County via the State Highway System.

Interstate 5 (I-5) – Golden State/Santa Ana Freeway

I-5 functions as a primary interstate route traversing Los Angeles County from north to south, facilitating both regional commuter traffic and long-haul freight movement. The corridor experiences significant congestion, particularly near the East Los Angeles Interchange and the I-605 junction. Strategic planning efforts should continue to focus on capacity enhancements, interchange redesigns, and freight corridor optimization to improve throughput and reduce travel time variability.

Interstate 10 (I-10) – Santa Monica Freeway

Stretching from the Pacific Ocean in Santa Monica to the eastern edge of the county, the I-10 is a major east-west corridor that links the Westside to Downtown Los Angeles and the Inland Empire. Known for its dense traffic and strategic importance, it also serves as a key route for cross-country travel, being part of the southernmost transcontinental interstate.

Interstate 105 (I-105) – Glenn Anderson Freeway

The I-105, also known as the Glenn Anderson Freeway and Century Freeway, is an east–west auxiliary interstate in Los Angeles County that runs approximately 18 miles from SR-1 near El Segundo and Los Angeles International Airport (LAX) to Studebaker Road in Norwalk. The corridor serves as a major commuter and goods movement route, connecting residential communities with employment centers and providing access to regional freeways such as I-405, I-110, and I-605. Traffic on I-105 is characterized by high volumes of passenger vehicles during peak commute periods, with average daily traffic exceeding 200,000 vehicles, and includes significant truck activity related to port and industrial facilities (Cambridge Systematics 2018).

Interstate 110 (I-110) – Harbor Freeway

The I-110, also known as the Harbor Freeway, is a major north–south corridor in Los Angeles County connecting the Port of Los Angeles in San Pedro to downtown Los Angeles and continuing as SR-110 toward Pasadena. The northern segment, called the Pasadena Freeway or Arroyo Seco Parkway, spans about 8.2 miles between US-101 and Glenarm Street in Pasadena. This corridor serves heavy commuter traffic near the port, while the parkway section restricts commercial vehicles over 6,000 pounds, reflecting its historic design and limited capacity. Roadway types along I-110 include high-capacity freeway lanes with HOV facilities in the southern portion and narrower, parkway-style lanes with reduced design speeds in the northern section (Caltrans 2025).

Interstate 210 (I-210) – Foothill Freeway

The I-210, known as the Foothill Freeway, runs east–west across the northern portion of Los Angeles County, beginning at I-5 near Sylmar and continuing to SR-57 near San Dimas before extending as SR-210 toward Redlands. The corridor serves as a major commuter route for the San Fernando Valley, Pasadena, and the San Gabriel Valley, linking residential areas with employment centers and regional freeways. Traffic consists primarily of high passenger vehicle volumes during peak commute periods, with additional truck traffic supporting the movement of goods between Los Angeles and the Inland Empire (California Highways 2024a).

Interstate 405 (I-405) – San Diego Freeway

The I-405 is one of the most heavily trafficked freeways in the U.S. Serving as a vital north-south artery through the west side of Los Angeles, it connects key regions including the San Fernando Valley, West Los Angeles, and the South Bay, and provides access to major destinations like LAX. Despite its congestion, it remains indispensable for commuters and freight transport alike. Drivers on the I-405 face a peak delay of 13 minutes during the 4 p.m. rush hour, costing commuters approximately 55 hours stuck in traffic every year (Dordulian Law Group 2021).

Interstate 605 (I-605) – San Gabriel River Freeway

The I-605, known as the San Gabriel River Freeway, is a major north–south corridor in Los Angeles County that extends from I-405 in Seal Beach to I-210 near Duarte, closely paralleling the San Gabriel River. The freeway serves as a critical link between the Gateway Cities and the San Gabriel Valley, accommodating substantial commuter traffic and goods movement. Traffic volumes are high, with significant passenger vehicle use during peak commute periods and notable truck activity, as I-605 is one of the region's primary freight routes connecting industrial areas and distribution centers (California Highway 2024b).

Interstate 710 (I-710) – Long Beach Freeway

The I-710, known as the Long Beach Freeway, is a major north–south corridor in Los Angeles County that runs approximately 18 miles from the Port of Los Angeles and Long Beach north to Valley Boulevard near Alhambra. The freeway closely follows the Los Angeles River for much of its length and serves as a critical goods movement route, connecting the ports to rail yards, warehouses, and regional distribution centers. Traffic volumes are extremely high, with heavy truck activity dominating the corridor due to freight transport from the ports, alongside substantial passenger vehicle use during peak commute periods. The roadway consists of a multi-lane freeway configuration, including general-purpose lanes and auxiliary lanes, with interchanges to major arterials providing local access (U.S. Environmental Protection Agency 2024).

State Route 1 (SR-1) – Pacific Coast Highway (PCH)

SR-1, commonly known as the Pacific Coast Highway (PCH), is a scenic coastal route that supports both recreational and local traffic through Malibu, Santa Monica, and Pacific Palisades. While not a primary commuter corridor, it plays a significant role in tourism and coastal access. Planning efforts should focus on preserving scenic integrity, enhancing pedestrian and cyclist safety, and implementing coastal erosion mitigation measures.

State Route 2 (SR-2) – Angeles Crest Highway

SR-2 transitions from an urban arterial to a mountainous scenic byway as it ascends into the Angeles National Forest. The Angeles Crest Highway segment is a designated scenic route and serves recreational users, emergency services, and seasonal tourism. Planning priorities include roadway maintenance, landslide prevention, and improved signage and safety infrastructure to support increased recreational demand.

State Route 14 (SR-14) – Antelope Valley Freeway

SR-14, known as the Antelope Valley Freeway, is a critical north–south corridor in northern Los Angeles County that connects I-5 near Santa Clarita to Palmdale and the Antelope Valley. This 36-mile stretch serves as a major commuter route for residents traveling between the Antelope Valley and the Greater Los Angeles area, as well as a key link for freight movement. Traffic on SR-14 is dominated by passenger vehicles during peak

commute periods, with additional truck activity supporting goods movement. The roadway is primarily a multi-lane freeway with interchanges and auxiliary lanes designed to improve mobility and safety, though congestion and collision rates remain higher than average in some segments (CA.gov 2024).

State Route 60 (SR-60) – Pomona Freeway

SR-60 is a major east-west corridor in Southern California. It connects the southeastern region of the Los Angeles basin to Orange County and the Inland Empire. The SR-60 leads from downtown Los Angeles east through Montebello, Diamond Bar, and Pomona, to the San Bernardino County Line which starts at the City of Chino. The corridor serves the Cities of Diamond Bar, El Monte, Industry, La Puente, Los Angeles, Montebello, Monterey Park, Pico Rivera, Pomona, Rosemead, South El Monte, Walnut and West Covina. The roadway consists of multi-lane freeway facilities with general-purpose lanes, high-occupancy vehicle lanes, and complex interchanges designed to support both personal travel and commercial transport (Caltrans 2022).

U.S. Highway 101 (US-101) – Hollywood/Ventura Freeway

US-101 is a vital east-west and north-south connector that supports high volumes of commuter and tourist traffic through central Los Angeles, including Hollywood and Downtown. The corridor is characterized by frequent bottlenecks and limited right-of-way expansion opportunities. Planning considerations should emphasize intelligent transportation systems (ITS), demand management, and potential transit-oriented development along adjacent corridors to alleviate pressure on this historic route.

Local Roadways

Wilshire Boulevard

Wilshire Boulevard is a major east-west arterial that stretches from Downtown Los Angeles to Santa Monica. It is one of the most heavily traveled corridors in the region, serving a mix of commercial, institutional, and residential land uses. The corridor supports high volumes of vehicular traffic and is a key transit spine, including Metro's Purple (D) Line subway and numerous bus routes. It is regionally significant for connecting major employment centers such as Koreatown, Miracle Mile, and Westwood.

Foothill Boulevard

Foothill Boulevard is a major east–west arterial that parallels I-210, serving communities such as Pasadena, Arcadia, Monrovia, and extending into the San Gabriel Valley. It primarily carries local and regional passenger traffic, with moderate transit service and occasional truck activity, functioning as a multimodal corridor with bus routes and bicycle facilities in some segments.

Whittier Boulevard

Whittier Boulevard is a major east–west arterial in Los Angeles County that runs from East Los Angeles through Montebello, Pico Rivera, and Whittier, serving as a key connector between residential neighborhoods, commercial corridors, and regional highways. Portions of the corridor are designated as SR-72 and SR-39 under Caltrans jurisdiction. Whittier Boulevard functions as a principal arterial with multiple lanes and signalized intersections, primarily serving passenger vehicles with moderate truck traffic linked to local businesses. The corridor also supports transit operations and experiences recurring congestion during peak travel periods, reflecting its role as a key urban connector.

Valley Boulevard

Valley Boulevard is a major east–west arterial in Los Angeles County that begins near Lincoln Heights in Los Angeles and runs through Alhambra, Rosemead, and the San Gabriel Valley toward Pomona, generally paralleling I-10 and SR-60. It serves as a key connector for residential, commercial, and industrial areas, accommodating primarily passenger vehicles with moderate truck traffic linked to local businesses and distribution centers. The roadway consists of multiple lanes with signalized intersections and supports transit operations, functioning as a principal arterial in the regional network.

Sunset Boulevard

Sunset Boulevard is a historic and scenic arterial that runs from Downtown Los Angeles through Hollywood and Beverly Hills to the PCH. It is known for its winding segments, especially through the Hollywood Hills, and experiences moderate to heavy traffic depending on the segment. While not a freeway alternative, it serves as a key connector between cultural and entertainment districts and is regionally significant for tourism and local circulation.

Sepulveda Boulevard

Sepulveda Boulevard is one of the longest north-south arterials in Los Angeles County, running parallel to the I-405 freeway. It serves as a major surface street alternative to the freeway, especially through the San Fernando Valley, Westside, and South Bay. The corridor experiences high traffic volumes and supports a mix of local and regional travel, including access to LAX and the Sepulveda Transit Corridor, a planned high-capacity transit project.

Rosemead Boulevard

Rosemead Boulevard is a major north–south arterial in Los Angeles County that runs through communities such as South El Monte and connects to regional destinations including Whittier Narrows Park and the Rio Hondo Trail. The corridor primarily serves passenger vehicles and local traffic, with bus transit routes providing regional connectivity. It is classified as a principal arterial and features multiple lanes with signalized intersections,

while ongoing planning efforts aim to enhance multimodal access through improved pedestrian and bicycle facilities (Reimagine Rosemead Blvd 2025).

Colorado Boulevard

Colorado Boulevard is a major east–west arterial in Los Angeles County that runs from Griffith Park through Glendale, Eagle Rock, Pasadena, and Arcadia, ending in Monrovia. It serves as a key connector between residential neighborhoods, commercial districts, and regional freeways such as SR-2 and SR-134. The corridor primarily accommodates passenger vehicles, with moderate truck traffic and transit service, including Metro bus routes. Classified as a principal arterial, Colorado Boulevard consists of multiple lanes with signalized intersections and supports local and regional mobility, experiencing congestion during peak travel periods (City of Pasadena 2022).

Ventura Boulevard

Ventura Boulevard is a major east–west arterial in Los Angeles County that runs through the San Fernando Valley, generally paralleling US-101 (Ventura Freeway). It serves as a key connector for residential neighborhoods, commercial corridors, and regional destinations. The corridor primarily accommodates passenger vehicles, with moderate truck traffic and transit service, including Metro bus routes. Classified as a principal arterial, Ventura Boulevard consists of multiple lanes with signalized intersections and supports multimodal travel, functioning as an important urban corridor for local and regional mobility.

Crenshaw Boulevard

Crenshaw Boulevard is a north-south arterial that runs through South Los Angeles and into the Westside. It is a culturally significant corridor with moderate to heavy traffic and a growing emphasis on multimodal transportation. The K Line (Crenshaw/LAX light rail) runs along portions of the corridor, enhancing its role as a regional transit corridor. Crenshaw is also a focus area for community investment and transit-oriented development.

Mulholland Drive

Mulholland Drive is a regionally significant scenic route that traverses the Santa Monica Mountains. It offers panoramic views of both the Los Angeles Basin and the San Fernando Valley and is frequently used for recreational driving and tourism. Planning efforts should prioritize scenic preservation, traffic calming, and safety improvements for cyclists and pedestrians, particularly at popular vista points.

Transit and Railway Transportation

Metro operates the Metro rail system, which is exclusively within Los Angeles County. The Metro rail system consists of the following lines: A, B, C, D, E, K. The hub of the system is in Downtown Los Angeles at Union Station. The Metro lines that primarily serve unincorporated areas include the Metro A, C, and E Lines. The Metro A Line stations that serve unincorporated areas include: Sierra Madre Villa, Slauson, Florence, Firestone,

Willowbrook/Rosa Parks and Del Amo. The Aviation/Imperial, Hawthorne/Lennox, Vermont/Athens, , and Willowbrook/Rosa Parks stations along the Metro C Line also serve unincorporated areas. The E Line has four stations that serve unincorporated areas: Indiana, Maravilla, East Los Angeles Civic Center, and Atlantic (Metro 2025). Two additional rail service operators that provide services in Los Angeles County are Metrolink and Amtrak. The Southern California Regional Rail Authority operates the 416-mile Metrolink commuter rail system, which has its hub in Downtown Los Angeles at Union Station and extends to Ventura, San Bernardino, Riverside, Orange, and San Diego counties, and serves some of the unincorporated areas. There is one Metrolink station located in the unincorporated community of Acton, on the Antelope Valley Line. Amtrak provides interstate service from points around the country to Union Station, as well as regional service between major cities throughout California.

With many regional and municipal operators providing bus services, buses provide the majority of public transit services in Los Angeles County. Examples of these operators include Torrance Transit, Foothill Transit, Santa Clarita Transit, and the Antelope Valley Transit Authority. According to Metro's 2020 Long Range Transportation Plan, the transit providers in Los Angeles County collectively operate 7,000 buses and serve 1.6 million bus riders daily (Metro 2020). The Metro bus system is the largest in Los Angeles County. Metro operates the Metro Rapid Bus service, which runs on select surface street corridors with fewer stops and electronic signal switching devices to expedite traffic flow, and the Metro Express Bus service, which are express bus routes for a portion of the route and then local or limited routes in other areas. Metro also operates two bus rapid transitways: the G Line and J Line. The Metro G Line operates on a dedicated bus lane in the San Fernando Valley and also includes a separated bike path that runs along part of the route. The Metro J Line operates between El Monte and the Downtown Long Beach. Furthermore, the Los Angeles County Department of Public Works operates fixed route shuttle services in the following unincorporated areas: Willowbrook and King Medical Center Shuttle services in Willowbrook; Athens Shuttle service in West Athens-Westmont; Lennox Shuttle service in Lennox; Florence-Firestone/Walnut Park Shuttle service in Florence-Firestone and Walnut Park; El Sol Shuttle service in East Los Angeles; Sunshine Shuttle service in South Whittier; Avocado Heights/Bassett/West Valinda Shuttle service in Avocado Heights, Bassett and West Valinda; East Valinda Shuttle service in East Valinda; Edmund D. Edelman's Children's Court Shuttle service in East Los Angeles; Los Nietos Heights Hopper in Rowland Heights and Hacienda Heights; Topanga Beach Bus in Topanga; Shuttle service in Los Nietos; and Acton/Agua Dulce Shuttle service in Acton and Agua Dulce.

Paratransit is an alternative mode of flexible transportation that does not follow fixed routes or schedules. Demand-responsive paratransit contractors are used to meet the needs of seniors and mobility-impaired individuals living in unincorporated areas. The Whittier paratransit service operating in the unincorporated communities of North Whittier, West Whittier–Los Nietos and South Whittier–Sunshine Acres has on average, the highest number of monthly boardings at 3,207. Unincorporated East Los Angeles has the second highest

demand with 2,049 boardings on average per month (Los Angeles County Department of Regional Planning 2016).

Bicycle and Pedestrian Transportation

The State Vehicle Code allows roadways to be used by bicyclists. Therefore, the entirety of surfaced roadways, excluding freeways, may be used by the bicycling public even though they are not all identified as bikeways. However, the lack of public awareness and the safety concerns associated with road sharing create a need for bikeways with a grade separation, lane delineation, or designated trail/path construction for bicycle users.

The Los Angeles County Bicycle Master Plan, adopted in March 2012, provides policy guidance for building a comprehensive bicycle network throughout the unincorporated areas. The Bicycle Master Plan identifies bikeways and transportation systems that are available for use by bicyclists, such as roadways with bike lanes or designated bike routes, and dedicated off-road bike paths, such as bike paths along the flood protection channels. The purpose of the Bicycle Master Plan is to: 1) guide the development of infrastructure, policies and programs that improve the bicycling environment; 2) depict the general location of planned bikeway routes; and 3) provide for a system of bikeways that is consistent with the General Plan (Los Angeles County 2012).

The County's 2012 Bicycle Master Plan describes bicycle facilities in unincorporated areas of the county:

Class I – Bicycle Path: Bike paths, also called shared-use paths or multi-use paths, are paved rights-of-way for exclusive use by bicyclists, pedestrians, and other non-motorized modes of travel. They are physically separated from vehicular traffic and can be constructed in roadway rights-of-way or exclusive rights-of-way. Most of the bicycle paths in the county are located along creek and river channels and along the beach.

Class II – Bicycle Lane: Bike lanes are defined by pavement striping and signage used to allocate a portion of a roadway for exclusive bicycle travel. Bike lanes are one-way facilities on either side of a roadway. Bike lanes are located adjacent to a curb where no on-street parking exists. Where on-street parking is present, bike lanes are striped to the left side of the parking lane.

Class III - Bicycle Route: Bike routes provide shared use with motor vehicle traffic within the same travel lane. Designated by signs, bike routes provide continuity to other bike facilities or designate preferred routes through corridors with high demand.

Class IV - Bikeways: A Class IV Bikeway (separated bikeway) is a bikeway for the exclusive use of bicycles and includes a separation required between the separated bikeway and the through vehicular traffic. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

The diversity of communities in Los Angeles County creates distinct conditions, opportunities and challenges for pedestrians. There are a number of trails and paths that

are available for use by pedestrians, such as sidewalks, hiking trails, over and under passes, and skywalks. Together, these systems constitute a network for accommodating pedestrian travel.

Los Angeles County Community Plan Areas / Regions

Los Angeles County is divided into 11 Planning Areas under the General Plan framework, each with distinct geographic, demographic, and transportation characteristics that influence regional planning and environmental review.

Antelope Valley Planning Area

The Antelope Valley Planning Area encompasses the County's northern high desert region, characterized by rural development patterns, agricultural uses, and renewable energy infrastructure. Transportation is primarily auto-dependent, with limited transit service and long travel distances between communities. The area is served by regional highways such as SR-14 and SR-138, with ongoing planning for improved transportation corridors and intercity connectivity.

Coastal Islands Planning Area

The Coastal Islands Planning Area, including Santa Catalina and San Clemente Island, is largely undeveloped and environmentally sensitive. Catalina supports limited vehicle use and relies heavily on pedestrian, bicycle, and golf cart travel within Avalon and Two Harbors. Access to the island is primarily by ferry or air, and transportation planning focuses on conservation and low-impact tourism.

East San Gabriel Valley Planning Area

The East San Gabriel Valley Planning Area is a suburban region with foothill communities and a mix of residential and commercial development. Transportation is supported by arterial roadways and regional transit services, including Metrolink, Metro A Line, and Foothill Transit. The area is also served by portions of I-10, SR-210, SR-57, SR-60, and SR-71. Active transportation infrastructure is expanding, particularly near schools and commercial corridors.

Gateway Planning Area

The Gateway Planning Area in southeast Los Angeles County is a heavily urbanized and industrialized region with a dense roadway network and significant freight movement. The area is served by major freeways such as portions of I-710, I-605, I-405, I-105, I-5, SR-91, SR-103, and SR-22 and freight rail lines, with transportation planning focused on reducing congestion, improving air quality, and enhancing connectivity for active transit modes.

Metro Planning Area

The Metro Planning Area includes unincorporated neighborhoods such as East Los Angeles, Florence-Firestone, and Willowbrook. It is one of the most densely populated areas in the

County, with a high reliance on public transit, including multiple Metro rail lines and extensive bus service. This area is served by portions of I-110, I-105, I-10, I-5, I-710, SR-60, and US-101. Transportation planning in this area emphasizes equity, safety, and multimodal access.

San Fernando Valley Planning Area

The San Fernando Valley Planning Area includes hillside and suburban communities with a mix of residential densities. This area is served by Metro bus lines, Metrolink commuter rail, and portions of I-210, I-5, I-405, SR-170, SR-134, SR-118, and SR-2. East–west highways include Lake Manor Drive and Foothill Boulevard. Challenges in this area can include wildfire evacuation planning, hillside access, and improving first/last-mile connections to transit.

Santa Clarita Valley Planning Area

The Santa Clarita Valley Planning Area is a rapidly growing suburban region with master-planned communities and significant greenbelt areas. This area is served by portions of I-5 and SR-14. North–south highways include Sierra Highway and Plum Canyon Road. Transportation is primarily auto-oriented, though Metrolink and local transit services (Santa Clarita Transit) provide regional access. Planning efforts in this area continue to focus on congestion management and sustainable growth.

Santa Monica Mountains Planning Area

The Santa Monica Mountains Planning Area is a largely rural and mountainous region with limited development and a strong emphasis on conservation. Roadways are narrow and winding, with limited transit access. Key arterials such as PCH pass through the planning area and is served by portions of US-101. Transportation planning in this area continues to prioritize wildfire evacuation, scenic preservation, and low-impact recreational access.

South Bay Planning Area

The South Bay Planning Area includes coastal and inland communities near the Ports of Los Angeles and Long Beach. It features a mix of residential, commercial, and industrial uses, with significant goods movement infrastructure. Transportation is multimodal, with Metro Rail (C Line and K Line), bus service, and active transportation corridors. This area is served by portions of I-405, I-110, I-105, SR-91, and SR-47. The main north–south highways include Vermont Avenue, Hawthorne Boulevard (SR-107), and La Cienega Boulevard. East–west highways and secondary highways include Torrance Boulevard, Manhattan Beach Boulevard, and Sepulveda Boulevard.

West San Gabriel Valley Planning Area

The West San Gabriel Valley Planning Area is a densely developed urban area with a mix of residential and commercial uses. It is served by Metro bus and rail lines, including the A (blue) Line, and has growing active transportation infrastructure. This area is served by portions of I-210, I-605, I-710, SR-110, I-10, and SR-60. North–south highways include

Rosemead Boulevard (SR-19), San Gabriel Boulevard, Sierra Madre Boulevard, Peck Road, and Myrtle Avenue. East–west highways and secondary highways include Potrero Grande Drive, Live Oak Avenue, New York Drive, Woodbury Road, Mariposa Street and Marengo Street, and Huntington Drive. Transportation planning in this area focuses on infill development, congestion relief, and multimodal connectivity.

Westside Planning Area

The Westside Planning Area includes affluent coastal and urban neighborhoods with high land values and significant employment centers. It is home to LAX, one of the busiest airports in the world, which serves as a major regional and international transportation hub. The area is served by Metro Rail (E Line and K Line), major arterials, and robust bus service. This area is served by portions of I-405, I-10, and SR-90. La Brea Avenue is the north-south highway and Slauson Avenue and Stocker Street are east–west highways within the planning area. Transportation planning emphasizes transit-oriented development, congestion management, and expanding bicycle and pedestrian infrastructure.

3.6.2 Regulatory Setting

This analysis was conducted in conformance with the goals and policies of federal, state, and local regulations. The following list summarizes the most applicable policies and regulations which would relate directly to future cannabis cultivation and cannabis product manufacturing under the proposed Project and associated impacts.

Federal

Americans with Disabilities Act (ADA) of 1990

Titles I, II, III, and V of the ADA have been codified in Title 42 of the U.S. Code (USC), beginning at Section 12101. Title III prohibits discrimination on the basis of disability in places of public accommodation (i.e., businesses and non-profit agencies that serve the public) and commercial facilities (i.e., other businesses). This regulation includes Appendix A to Part 36, Standards for Accessible Design, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility.

Examples of key guidelines include detectable warning for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

State

Statewide Transportation Improvement Program

The California Transportation Commission administers transportation improvement programming. Transportation programming is the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. It commits expected revenues over a multi-year period to transportation projects. The State

Transportation Improvement Program (STIP) is a multi-year Capital Improvement Program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources. Caltrans manages the operation of State Highways, including the freeways passing through the Greater Los Angeles Region.

Congestion Management Program (CMP)

The CMP was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. The CMP is managed at the countywide level and primarily uses a Level of Service (LOS) performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.

On June 20, 2018, Metro initiated a process to gauge the interest of local jurisdictions in opting out of CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached, and the County of Los Angeles had opted to be exempt from the CMP. As such, the provisions of the CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in the County's environmental documents.

Senate Bill (SB) 743

Signed by Governor Brown in 2013, as part of environmental review of traffic and transportation impacts under CEQA, Senate Bill (SB) 743 requires a move away from vehicle delay and LOS within CEQA transportation analyses. It also requires the Governor's Office of Land Use and Climate Innovations (LCI) to identify new metrics for identifying and mitigating transportation impacts. LCI identified VMT per capita and VMT per employee as the new metrics for transportation analysis.

Local

Local agencies responsible for transportation services in Los Angeles County coordinate their activities to comply with the goals and policies of SCAG and Metro. SCAG is the federally designated regional transportation planning agency responsible for preparing the RTP/SCS. Metro is the county level transportation planning agency responsible for the preparation of the Long Range Transportation Plan (LRTP). The County, the 88 cities in Los Angeles County, and other transportation agencies engage in transportation planning activities by participating in the development and implementation of the RTP and LRTP (Los Angeles Department of Regional Planning 2025).

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG is the designated Metropolitan Planning Organization for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial) and is

federally mandated to develop plans for regional transportation, land use and growth management, and air quality.

SCAG updates its long-range (i.e., minimum 20 years) RTP/SCS every four years, per federal law (23 USC §134 et seq) and state law (SB 375). The SCS is a required element of the RTP that provides a plan for meeting GHG emissions reduction targets set forth by the California Air Resources Board (CARB). SCAG's 2016–2040 RTP/SCS provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the South Coast Air Quality Management District. CARB has determined SCAG's reduction target for per capita vehicular emissions to be 8 percent by 2020 and 13 percent by 2035 relative to the 2005 baseline.

In June 2016, CARB determined that SCAG's 2016–2040 RTP/SCS is consistent with their greenhouse gas (GHG) reduction targets. Successfully meeting these targets will require substantial effort to reduce VMT. The 2016 RTP/SCS calls for investing $6.9 billion toward TDM strategies throughout the region. These strategies focus on reducing the number of drive-alone trips and overall VMT through ridesharing, which includes carpooling, vanpooling and supportive policies for ridesharing services such as Uber and Lyft; redistributing or eliminating vehicle trips from peak demand periods through incentives for telecommuting and alternative work schedules; and reducing the number of drive-alone trips through increased use of transit, rail, bicycling, walking and other alternative modes of travel.

Of the eight goals presented in the 2016–2040 RTP/SCS, four are applicable to

transportation, including the following:

- Goal 2: Maximize mobility and accessibility for all people and goods in the region.
- Goal 3: Ensure travel safety and reliability for all people and goods in the region.
- Goal 5: Maximize the productivity of our transportation system.
- Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).

On April 4, 2024, SCAG's Regional Council unanimously voted to approve and fully adopt the 2024-2050 RTP/SCS (Connect SoCal). The 2024-2050 RTP/SCS includes more than four years of consultation with stakeholders and the public to capture the goals and objectives of the people within the region and capture the most current available data for determining future demographic projections. The intent of the plan is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

Metro LRTP & Congestion Management Program (CMP)

The LRTP and CMP together form the backbone of regional transportation planning and management in Los Angeles County. The LRTP sets forth a comprehensive, long-term vision for investing in transit, highways, active transportation, and goods movement, guiding how

billions of dollars in local, state, and federal funds are prioritized over the next several decades. Complementing this, the CMP is a state-mandated program administered by Metro that focuses on monitoring and managing traffic congestion, integrating land use and transportation decisions, and ensuring that new development mitigates its impact on the regional transportation network. Together, these programs ensure that transportation investments and policies in Los Angeles County are coordinated, data-driven, and aligned with broader goals for mobility, air quality, and sustainable growth (Metro 2020).

Los Angeles County General Plan

The County General Plan provides the policy framework and establishes the long-range vision for how and where the unincorporated areas will grow, and establishes goals, policies, and programs to foster healthy, livable, and sustainable communities. As previously described, the county is subdivided into 11 planning areas with specific growth and development policies. The purpose of the Planning Areas Framework is to provide a mechanism for local communities to work with the County to develop plans that respond to their unique and diverse character.

In addition, Los Angeles County Public Works Transportation division is responsible for traffic operations in the County. As part of their responsibilities, the division establishes thresholds for determining when projects require traffic studies, established significance thresholds for evaluating traffic impacts, and reviews and authorizes work plans for construction that encroaches into public streets. The Transportation Business Plan also establishes various strategies to improve community well-being and livability and to expand Countywide mobility and opportunities for alternate transportation choices (Los Angeles County Public Works 2025).

Air Quality Element

The Air Quality Element summarizes air quality issues and outlines the goals and policies that will improve air quality and reduce greenhouse gas emissions. The Community Climate Action Plan is a sub-component of the Air Quality Element.

Mobility Element

The Mobility Element of the Los Angeles County General Plan 2035 provides the policy framework for developing a safe, efficient, and multimodal transportation system in the County's unincorporated areas. In compliance with the California Complete Streets Act, the Mobility Element addresses the needs of all users—including pedestrians, bicyclists, transit riders, motorists, seniors, children, and persons with disabilities—through policies and programs that promote accessibility, safety, and connectivity.

The Element is supported by two sub-elements: the Highway Plan and the Bicycle Master Plan, which guide the development of roadway and bikeway infrastructure. It also includes a program for preparing Community Pedestrian Plans to enhance walkability and first/last-mile connections to transit.

The Highway Plan

The Los Angeles County Highway Plan, a component of the County's General Plan Mobility Element, serves as a long-range planning tool for the development and classification of roadways in unincorporated areas and select contract cities. Administered by the Los Angeles County Department of Public Works, the plan designates roadways by functional classification—such as Major Highways, Secondary Highways, and Expressways—based on their intended capacity and role in the regional transportation network. The plan supports coordinated land use and transportation planning, informs roadway design standards, and guides infrastructure investments. It is periodically updated to reflect changes in land use, mobility needs, and regional planning priorities. The Highway Plan is integrated with other transportation planning efforts, including the County's Bicycle Master Plan, pedestrian planning initiatives, and regional plans such as SCAG's Regional Transportation Plan and Metro's Long Range Transportation Plan.

Bicycle Master Plan

The Los Angeles County Bicycle Master Plan is a policy and planning document adopted by the County to guide the development of a comprehensive bikeway network in unincorporated areas. The Bicycle Master Plan supports the County's goals for sustainable transportation, public health, and greenhouse gas reduction by promoting bicycling as a viable mode of transportation.

The Plan identifies existing and proposed bikeways, classifies facilities by type (e.g., Class I bike paths, Class II bike lanes, and Class III bike routes), and outlines design guidelines to improve safety, accessibility, and connectivity. It emphasizes the integration of bicycle infrastructure with land use planning and transit systems, and prioritizes routes that connect residential areas with schools, employment centers, commercial districts, and recreational destinations.

3.6.3 Impact Assessment Methodology

Significance Thresholds

Appendix G of the CEQA Guidelines set forth the following thresholds for analyzing a project's impacts regarding transportation. Appendix G states that a project normally would have a significant impact if the project would:

- Conflict with an applicable program, plan, or ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);
- Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment); and/or
- Result in inadequate emergency access.

Additionally, the County has established transportation-based significance thresholds through the *Los Angeles County Transportation Impact Analysis (TIA) Guidelines* (Los

Angeles County Public Works 2020). These guidelines outline the analysis methodologies, screening criteria, and thresholds of significance used by the County to identify potential VMT impacts pursuant to CEQA Guidelines Section 15064.3(b). In accordance with the Los Angeles County TIA Guidelines, a VMT screening is conducted as an initial step assess whether a less than significant determination can be made without a full VMT analysis.

The Los Angeles County TIA Guidelines provides thresholds to determine whether a project can be screened out of needing a VMT analysis. Since the proposed Project does not involve or otherwise affect residential land use, it was evaluated against three different screening criteria per Section 3.1.2 of the Los Angeles County TIA Guidelines. The screening criteria used are detailed below:

- Non-Retail Project Trip Generation Screening Criteria: A non-retail project is considered a "small project" if it does not generate a net increase of 110 or more daily vehicle trips. This criterion can be used in conjunction with the project's location and average trip distance to determine whether a less than significant determination can be made.
- Retail Project Site Plan Screening Criteria: A project that contains a local serving retail use is assumed to have less than significant VMT impacts for the retail portion of the project. If the project does not contain retail uses that exceed 50,000 square feet of gross floor area, further analysis is not required and a less than significant determination can be made for the retail component of the project.
- Proximity to Transit Based Screening Criteria: If a project is located within a one-half mile radius of a major transit stop[1] or an existing stop along a high-quality transit corridor,[2] then the following subsequent questions should be considered:
    - Does the project have a Floor Area Ratio less than 0.75?
    - Does the project provide more parking than required by the County Code?
    - Is the project inconsistent with the SCAG RTP/SCS?
    - Does the project replace residential units set aside for lower income households with a smaller number of market-rate residential units?

    If the answer to all four questions is no, further analysis is not required, and a less-than-significant determination can be made.

Methodology

[1] California Public Resource Code §21064.3 defines major transit stop as follows: an existing rail or bus rapid transit station; a ferry terminal served by either a bus or rail transit service; and the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods. (This definition was amended from an interval of 15 minutes to 20 minutes as of January 2025.)

[2] California Public Resource Code §21155 defines high-quality transit corridor as: a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Because some project details, such as location, size, and specific use of individual projects under the proposed Project, have not yet been defined, a project-level VMT analysis cannot be conducted for the full program at this time. Instead, a programmatic level evaluation was conducted by transportation consultant Fehr & Peers and is provided in Appendix E and summarized below. The methodology and thresholds used in this programmatic evaluation were developed in consultation with and approved by County Public Works staff.

VMT

The individual proposals and specific sites for future commercial cannabis businesses have not yet been identified, and therefore, the specific sizes and locations of any such businesses remain unknown. Nevertheless, the following screening criteria may be applicable to future commercial cannabis businesses under the proposed Project:

- Projects Located in Transit Proximity Area – applicable to all cannabis business types
- Small Projects – applicable to all cannabis business types, except for storefront retail
- Locally Serving Retail Projects – applicable to storefront retail only

Application of these criteria to individual cannabis businesses permitted under the Project is discussed in the following sections .

Projects Located in Transit Proximity Area

A commercial cannabis business located in a transit proximity area can be presumed to have a less than significant VMT impact, if it meets additional considerations recommended by Los Angeles County TIA Guidelines. For a cannabis business located outside of a transit proximity area, the VMT could exceed the allowable thresholds identified by the County and could potentially result in a significant VMT impact. However, cannabis businesses that are not within a Transit Proximity Area could still potentially be found to have a less than significant VMT impact based on the Small Project or Locally Serving Retail Projects criteria. Since the location of individual cannabis businesses that could be permitted under the Project have not been identified, a less than significant determination cannot be made using this criterion.

Small Projects

Commercial cannabis businesses that are anticipated to generate fewer than 110 average daily vehicle trips (ADT) may be evaluated using the Small Project Screening Criteria as one line of evidence in the VMT analysis. A less than significant VMT impact determination may be supported where the project would not be expected to generate longer-than-average trips (e.g., trips exceeding the neighborhood's or planning area's average trip length), based on project-specific characteristics and available data. This screening criteria is applicable to the Project land use categories except for storefront retail.

Trip generation estimates for small projects were developed using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 12th Edition (August 2025) as the primary data source, supplemented by other published sources where ITE data are not

available. Consistent with standard methodology, vehicle trip rates are expressed in terms of average daily trips per 1,000 square feet of gross floor area or per acre, depending on the land use type.

To assist in the evaluation of vehicle trip rates for this analysis, the allowable business types under the Project were consolidated into groups based on the cannabis business type definitions and eligible zoning, to distinguish primary trip purposes and potential VMT implications,

- Group 1 – Cultivation, Manufacturing, and Testing: These uses do not include direct sales to consumers and generally do not operate as customer-facing destinations. Trip-making is expected to be dominated by employee commute trips, with additional, lower-frequency trips associated with goods movement and site services (e.g., deliveries, waste hauling, and maintenance).
- Group 2 – Distribution, Storefront Retail, Non-storefront Retail, and Microbusinesses: These uses involve transporting cannabis products between licensed businesses and/or selling products to consumers. In addition to employee commute trips, they are expected to generate customer/visitor trips (storefront retail), delivery-driver and delivery-vehicle trips (non-storefront retail), and inter-business transport trips (distribution). Microbusiness is included in this group because it may combine multiple activities, potentially including distribution and retail, thereby generating similar visitor and delivery trip patterns.

Once grouped, associated trip generation rates can then be used to estimate the trip generation for various commercial cannabis business types:

- Group 1 - Cultivation, Manufacturing, and Testing
  - Cultivation: The ITE Trip Generation Manual does not provide a daily trip rate for cultivation uses. Therefore, alternative sources of trip generation rates were explored based on prior studies. A rate of 67.3 daily trips per acre for "Indoor Cultivation"[3] was applied to the proposed cultivation uses, which aligns with the proposed Project's restriction to indoor operations. This rate was converted to 1.54 trips per 1,000 square feet using the formula: 67.3 trips per acre ÷ 43.56 (1,000 square feet per acre).
  - Manufacturing: ITE Trip Generation Manual "Manufacturing" (Land Use 140) daily trip rate of 4.27 per 1,000 square feet of gross area was used for both Non-volatile Manufacturing and Volatile Manufacturing.
  - Testing: ITE Trip Generation Manual does not provide a daily trip rate for "Testing" land uses. The "Research and Development Center" category (Land Use 760), which involves similar analytical and laboratory activities, was applied to for cannabis testing facilities. Therefore, a trip generation rate of 9.47 daily trips per 1,000 square feet of gross area was applied.
- Group 2– Distribution, Storefront Retail, Non-storefront Retail, and Microbusinesses

[3] County of Santa Barbara, Final Environmental Impact Report (EIR) for the Cannabis Land Use Ordinance and Licensing Program, December 2017

- Distribution: ITE Trip Generation Manual does not provide a specific daily trip rate for "Distribution" land uses. The "Warehouse" category (Land Use 150), which includes distribution- and storage-related activities, was applied to cannabis distribution facilities. Accordingly, a trip generation rate of 1.38 daily trips per 1,000 square feet of gross area was used.
- Retail (Storefront and Non-storefront): ITE Trip Generation Manual defines "Cannabis Dispensary" (Land Use 882) as a standalone facility where cannabis is sold to patients or retail consumers in a legal manner, with an average daily trip rate of 227.76 per 1,000 square feet of gross area. However, ITE does not specify whether this land use represents storefront or non-storefront (delivery-only) operations. For a non-storefront retail, delivery-only model, trip generation is driven primarily by delivery activity and varies by the operator's business plan. Thus, it is more appropriate to define a project's maximum size by total daily vehicle trips, including delivery and employee commute trips, and to evaluate whether that total remains below 110 ADT.
- Microbusiness: The proposed Project would allow cannabis microbusinesses that consist of at least three of the following small-scale cannabis activities at one location: 1) Indoor cultivation with a maximum canopy size smaller than 10,000 square feet; 2) Non-volatile manufacturing; 3) Distribution; 4) Storefront retail sales; 5) Non-storefront retail sales. The daily trip rates listed above should be considered for Microbusiness on a case-by-case basis.

Trip Generation Estimates

Under the proposed Project, commercial cannabis activities would only be allowed in existing, legally constructed, and permitted structures located in commercial, commercial-only mixed-use, industrial, and institutional zones. Chapter 2, *Project Description* describes the eligible land use types corresponding to each cannabis business types (refer to Table 2-3).

For individual projects that propose to replace existing businesses currently operating on these sites, a trip credit may be applied to account for the travel demand that would be eliminated by the removal of the existing use. Table 3.6-2 presents the daily trip generation rates for both the existing eligible land use types as well as the proposed Group 1 and Group 2 cannabis business types.

Table 3.6-2. Trip Generation Rates of Eligible Existing Land Use and Proposed Allowable Land Use

Proposed Allowable Cannabis Business Type					Existing Eligible Land Use			
Cannabis Business Licensing Type		ITE Land Use Code [a]	ITE Land Use Category	Daily Trip Rate [b]	Eligible Existing Land Use Type	ITE Land Use Code[a]	ITE Land Use Category	Daily Trip Rate[b]
1	Cultivation	190	Cannabis Cultivation and Processing	1.54 [c]	Industrial	110	General Light Industrial	3.6
	Non-volatile manufacturing	140	Manufacturing	4.27	Industrial	140	Manufacturing	4.27
						110	General Light Industrial	3.6
					Commercial	822	Strip Retail Plaza (<40k)	54.45
	Volatile manufacturing	140	Manufacturing	4.27	Industrial	140	Manufacturing	4.27
						110	General Light Industrial	3.6
	Testing	760	Research and Development Center	9.47	Commercial	822	Strip Retail Plaza (<40k)	54.45
					Industrial	110	General Light Industrial	3.6
						140	Manufacturing	4.27
					Institutional	730	Government Office Building	22.59
						760	Research and Development Center	9.47
						630	Walk-In Clinic	37.6
2	Distribution	150	Warehouse	1.38	Industrial	150	Warehouse	1.38
						140	Manufacturing	4.27
						110	General Light Industrial	3.6
					Commercial	822	Strip Retail Plaza (<40k)	54.45
	Storefront retail	882	Cannabis Dispensary [d]	227.76	Commercial	822	Strip Retail Plaza (<40k)	54.45
					Industrial	110	General Light Industrial	3.6

Proposed Allowable Cannabis Business Type					Existing Eligible Land Use			
Cannabis Business Licensing Type		ITE Land Use Code [a]	ITE Land Use Category	Daily Trip Rate [b]	Eligible Existing Land Use Type	ITE Land Use Code[a]	ITE Land Use Category	Daily Trip Rate[b]
	Non-storefront retail	882	Cannabis Dispensary	227.76	Commercial	822	Strip Retail Plaza (<40k)	54.45
					Industrial	110	General Light Industrial	3.6
						140	Manufacturing	4.27
	Microbusiness	Refer to the rates above on a case-by-case basis [e]				Refer to the rates above on a case-by-case basis [e]		

Notes:

[a] Source: ITE Trip Generation Manual, 12th Edition, August 2025.

[b] Daily trip rates provided as trips per 1,000 square feet.

[c] The daily trip rate for cultivation is not provided in the ITE Trip Generation Manual. Therefore, it was sourced from the County of Santa Barbara Final EIR, which reports 67.3 trips per acre for "Indoor Cultivation." This rate was converted to 1.54 trips per 1,000 square feet using the formula: 67.3 trips per acre ÷ 43.56 (1,000 square feet per acre).

[d] ITE definition: A cannabis dispensary is a stand-alone facility where cannabis is sold to patients or retail consumers in a legal manner.

[e] The proposed Project would allow cannabis microbusinesses that consist of at least three of the following small-scale cannabis activities at one location: 1) Indoor cultivation with a maximum canopy size smaller than 10,000 square feet; 2) Non-volatile manufacturing; 3) Distribution; 4) Storefront retail sales; 5) Non-storefront retail sales.

Table 3.6-3 outlines the maximum allowable size for each cannabis business type that would generate fewer than 110 ADT - the threshold below which a commercial cannabis business licensed under the Project is presumed to have a less than significant VMT impact. It is presumed that commercial cannabis facilities that exceed the size thresholds identified in Table 3.6-3 may generate VMT levels above the County's significance threshold and therefore could result in a potentially significant VMT impact.

Table 3.6-3. Project Maximum Allowable Size per the Small Project Screening Criteria, without Existing Trip Generation Credit

Group	Cannabis Business Licensing Type	Maximum Project Size (square feet)	Daily Trip Generation Rate [a]
1	Cultivation	71,400	1.54
	Non-volatile manufacturing	25,800	4.27
	Volatile manufacturing	25,800	4.27
	Testing	11,600	9.47
2	Distribution	79,700	1.38
	Non-storefront retail [b]	500	227.76
	Microbusiness	Refer to the rates above on a case-by-case basis	

Notes:
[a] Daily trip generation rates provided as trips per 1,000 square feet. Daily trip generation rates are consistent with Table 3.6-2.
[b] The maximum allowable size per the Small Project Screening Criteria is applicable to non-storefront retail only. For storefront retail, please refer to following section of *Locally Serving Retail Projects.*

Trip Distance

Trip distance is a location-based metric that, together with trip generation estimates, helps evaluate potential VMT impacts. It reflects where cannabis businesses are located and the typical origins and destinations of employee, customer, and delivery trips.

For Group 1 uses (Cultivation, Manufacturing, and Testing), trip distance is driven primarily by employee commute trips. These businesses are more likely to result in a less-than-significant VMT impact when commute distances are shorter and/or when a higher share of employees use non-single-occupant vehicle modes (e.g., carpool, transit, biking, or walking).

For Group 2 uses (Distribution, Storefront Retail, Non-storefront Retail, and Microbusiness), trip distance reflects a combination of employee commute trips and product movement/customer access trips, including deliveries and, for storefront retail, visitor trips. As a result, Group 2 uses can generate higher VMT than Group 1 because they add trip-making beyond employee travel and may involve longer or more frequent vehicle trips across a broader service area.

Because individual cannabis business locations, operating characteristics, and intensity are not yet defined, trip distances cannot be reliably estimated at this time. Likewise, individual project sizes and maximum trip generation rates cannot be reliably determined. Therefore, the Small Project screening criterion cannot support a less than significant VMT determination for the Project.

Locally Serving Retail Projects

The proposed Project would allow for the establishment of two types of commercial cannabis retail operations in select areas of unincorporated Los Angeles County: cannabis storefront and non-storefront retail (delivery-only). Non-storefront retail operations, which exclusively provide delivery services, are not classified as locally serving and therefore would not qualify under this criterion.

Based on the Los Angeles County TIA Guidelines, retail projects under 50,000 square feet are generally presumed to be locally serving, and therefore result in a less than significant VMT impact. Storefront cannabis retail facilities within this size threshold would typically qualify under this criterion. However, storefront cannabis facilities that exceed 50,000 square feet may not be presumed locally serving, and could potentially result in a significant VMT impact if their VMT level exceed the County's thresholds. Although it is unlikely that a cannabis retail storefront would exceed 50,000 square feet, individual storefront retail sizes have not yet been identified; therefore, a less than significant determination cannot be made using this criterion.

3.6.4 Environmental Impacts Analysis

TR-1:	The proposed Project would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Analysis of the consistency of a project with local and regional plans, such as the SCAG RTP/SCS, Mobility Element, or other regional transportation and circulation planning documents, is required under CEQA. In the County, consistency with the SCAG RTP/SCS means that changes in the transportation system and vehicle miles traveled resulting from the proposed Project are accounted for in SCAG's RTP/SCS forecasted assumptions through the year 2050. To determine traffic conditions through 2050, the RTP/SCS relies on planned capital improvement projects, existing and project land use patterns, and population and job growth forecasts.

Policies set forth in the RTP/SCS and Mobility Element serve to improve the future transportation and circulation environment resulting from planned buildout of the Comprehensive Plan Land Use Element based on existing land use designations. The proposed Project would permit and regulate commercial cannabis activities in certain areas of the unincorporated county, which are served by existing transportation networks and services and governed and planned according to a wide range of transportation plans,

policies, regulations, and programs. The proposed Project does not include the development of new buildings, residential or otherwise, and would be limited in its potential for indirect growth inducement. 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. As described in Impact TR-2, according to the VMT analysis from Fehr & Peers, given the lack of information regarding individual cannabis business sizes and locations, the operation of commercial cannabis businesses could generate VMT in excess of the County's impact thresholds (Appendix E). However, in the context of trip generation resulting from existing land use designations and zoning regulations as well as regional trip generation anticipated in the SCAG RTP/SCS, these operational impacts would be negligible. The proposed Project would not substantially contribute to cumulative increases in traffic or otherwise conflict with applicable programs, plans, and policies relating to transportation and circulation, thereby causing a *less than significant impact.*

TR-2:	The proposed Project would potentially conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b).

As previously described, CEQA Guidelines Section 15064.3(b) sets forth general criteria for local jurisdictions to use when evaluating a project's impacts regarding VMT, or the amount and distance of automobile travel attributable to a project. Additionally, the County has established transportation-based significance thresholds through the *Los Angeles County TIA Guidelines* (Los Angeles County Public Works 2020). These guidelines outline the analysis methodologies, screening criteria, and thresholds of significance used by the County to identify potential VMT impacts pursuant to CEQA Guidelines Section 15064.3(b).

Because specific sites for future commercial cannabis businesses have not yet been identified, the sizes and locations of such businesses remain unknown. Nevertheless, Fehr & Peers conducted a programmatic, comparative analysis of the Los Angeles County TIA Guidelines VMT screening criteria and the proposed cannabis uses under the proposed Project to determine whether individual cannabis business could generate VMT in excess of the County's impact thresholds.

Based on this analysis, while some individual commercial cannabis businesses licensed under the Project may fall below the screening criteria and result in a less than significant VMT impact, not all future projects are guaranteed to do so. If a proposed commercial cannabis business does not meet any screening criteria, its VMT may exceed the County's impact threshold, potentially resulting in a significant impact. Under the proposed Project, individual businesses may be located outside a transit proximity area, may exceed the maximum levels associated with the 110-ADT Small Project threshold, and storefront retail may not be screened out as a locally serving retail project. In addition, project-specific trip distances for future commercial cannabis businesses allowed under the Project cannot be determined at this time. Therefore, impacts are considered *potentially significant*.

TR-3: The proposed Project would not substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment).

The proposed Project would not produce substantial new development and would not involve additions or alterations to the existing transportation network, nor would it result in the operation of large farm equipment or introduce other incompatible uses on existing roadways. New commercial cannabis operations may result in increases in the number of commercial truck trips within eligible commercial or industrial areas, particularly for the transport of cannabis or cannabis products. However, such vehicles are likely to be similar to the vehicles associated with existing commercial and industrial development and would not substantially increase transportation-related hazards. While there could be a potentially significant increase in the number of vehicle trips generated as a result of commercial cannabis businesses, the proposed Project would not physically affect the existing roadway network or proposed transit, bicycle, or pedestrian facilities. Commercial cannabis activities would only be allowed in existing, legally constructed, and permitted structures located in commercial, commercial-only mixed-use, industrial, and institutional zones. It is anticipated that new curb cuts, driveways, etc. would not be required to support these uses. As described in Section 3.5, *Land Use and Planning*, the proposed Project would not conflict with applicable transportation plans, policies, or programs, including plans and policies that are oriented towards encouraging the use of alternative modes of transportation and enhancing the availability, operation, and safety of these facilities. Therefore, the proposed Project would not increase hazards due to incompatible uses, impacts would be *less than significant.*

TR-4: The proposed Project would not result in inadequate emergency access.

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. While retail cannabis businesses have the potential to increase the number of vehicle trips within commercial and industrial zones, these businesses would be required to operate within existing, legally constructed and permitted structures, with existing roadways and regulated emergency access routes. Additionally, 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 to comply with the access requirements of the Los Angeles County Code (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*.

3.6.5 Cumulative Impacts

As described in Chapter 2, *Project Description*, the proposed Project would license certain commercial cannabis businesses in eligible industrial, commercial, commercial-only mixed-use, and institutional zones. Cumulative development within these eligible zones has the potential to increase trip generation and regional VMT within the unincorporated county. However, in the context of trip generation resulting from existing land use designations and zoning regulations as well as regional trip generation anticipated in the SCAG RTP/SCS, operational impacts associated with the proposed Project would be negligible.

As described in Impact TR-2, some cannabis businesses licensed under the Project may be located within a transit proximity area, generate less trips than other land uses already allowed under existing land use designations and zoning regulations, or be sized such that the business would not exceed the Small Project or Locally Serving Retail Projects screening criteria. Further, the proposed LACC Title 8 amendments would limit the total number of licenses and percentage of available licenses that could be issued within the same General Plan Planning Area and Supervisorial District. Although it is also possible that some cannabis businesses licensed under the Project could exceed these criteria and generate VMT that would result in a project-specific VMT impact, the spatial requirements regarding the acceptable locations of commercial cannabis businesses, along with the proposed LACC Title 22 eligible zones, would avoid creating a substantial number of commercial cannabis businesses concentrated within any given service area, thereby reducing the potential for localized cumulative impacts regarding transportation and traffic.

For these reasons, the proposed Project is not considered to result in a cumulatively considerable contribution to a significant cumulative impact regarding transportation.

3.6.6 Mitigation Measures

As described in Impact TR-2, implementation of the proposed Project could result in a potentially significant impact to VMT. The majority of the proposed commercial cannabis business types would not have a substantial impact on land use assumptions and VMT assumptions, when compared to existing uses allowed within commercial and industrial zoning districts. It is anticipated that many commercial cannabis businesses would typically result in less trips than other land uses already allowed within those zones under existing land used designations and zoning regulations, or be sized such that they would not exceed the County's VMT screening criteria. However, because the individual project sizes, maximum trip generation rates, and project-specific trip distances associated with future commercial cannabis businesses cannot be reliably determined at this time, some uses – including cannabis retail uses, in particular – would have the potential to result in greater

trip generation than existing uses and exceed the Small Project or Locally Serving Retail Project screening criteria.

Specific VMT mitigation cannot be quantified without project-specific locations and operating characteristics. Nevertheless, applicable TDM strategies from the Los Angeles County TIA Guidelines may be considered to reduce VMT, primarily by targeting employee commute trips. The following mitigation measure would be required for the Project and would be at least partially effective in reducing impacts from commercial cannabis businesses that would generate VMT predominately from employee commute trips (e.g., Group 1 business types [cultivation, non-volatile and volatile manufacturing, and testing]).

However, these measures are generally less effective for delivery, visitor, and inter-business transport trips. Because the Project includes uses that generate customer/visitor, delivery, and distribution trips, reliable VMT reduction strategies are not readily available. For example, pedestrian network improvements (e.g., sidewalks) required as a condition of approval would likely be limited in extent (often to the project frontage) and may not create a connected, convenient walking network that would meaningfully shift travel behavior. In addition, the California Air Pollution Control Offices Association's quantified effectiveness for this measure depends on the incremental increase in sidewalk coverage; where sidewalks already exist or few improvements are warranted, the VMT reduction would be minimal.

In order to effectively mitigate significant VMT impacts, future analysis of project-specific characteristics provided by future applicants and the potential VMT generated by the individual project would be required. However, mitigation requiring future applicants to provide such analysis is not considered feasible for the Project. Requiring such future study would involve discretionary review and approval by the County, elevating individual cannabis business licensing and permitting applications from a Site Plan Review – a typically ministerial permitting and approval process - to a Conditional Use Permit – a more intensive, discretionary permitting and approval process. Requiring mitigation that would shift the permitting process from a ministerial to a discretionary process would conflict with Project Objective No. 5. Further, even with future site-specific VMT analysis, mitigating VMT generated by customer/visitor, delivery, and distribution trips would remain a challenge.

MM TR-1 Transportation Demand Management Strategies

The County will require transportation demand management (TDM) strategies to mitigate impacts to the maximum extent practicable. Recommended TDM measures from the County's TIA Guidelines that may be applicable to commercial cannabis businesses include:

Commute Trip Reduction (CTR) Programs with Required Monitoring

This measure would implement a mandatory CTR program with employers. CRT programs discourage single-occupancy vehicle trips and encourage

alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT.

Ride Sharing Programs

This measure would implement a ridesharing program or establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips and VMT.

Subsidized or Discounted Transit Programs

This measure would provide subsidized, discounted, or free transit passes for employees to make public transit more cost competitive versus driving. Increasing the total number of public transit trips and decreasing vehicle trips would result in a reduction in VMT.

Pedestrian Network Improvements

This measure would increase the sidewalk coverage to improve pedestrian access. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT.

3.6.7 Residual Impacts

The implementation of MM TR-1 would require mitigation of VMT impacts on a project-specific level, primarily for cannabis cultivation, non-volatile and volatile manufacturing, testing business types that generate VMT predominately from employee commuter trips. However, due the absence of project-specific details at this time, it cannot be determined that these mitigation measures alone would reduce impacts, particularly those from delivery, visitor, and inter-business transport trips, to a less than significant level. Furthermore, employer-based TDM measures (e.g., rideshare, carpooling, etc.) may be difficult to implement and/or may not be effective in reducing trip generation to a level that is less than significant. No other mitigation measures are considered feasible to reduce VMT impacts of the Project. Therefore, even with the implementation of MM TR-1, VMT impacts would be considered *significant and unavoidable*.

3.7 UTILITIES/SERVICE SYSTEMS

The Commercial Cannabis Business Licensing Program (Project) would enable cannabis activities that would require the use of water, wastewater, solid waste, and/or telecommunication infrastructure and facilities. Pursuant to the proposed Los Angeles County Code (LACC) amendments, all commercial cannabis businesses would occupy existing buildings that are located within urban and suburban areas that currently receive utility services for non-cannabis uses with similar utility needs. Therefore, such buildings would likely have the capacity to accommodate future cannabis uses and would not require the construction of additional facilities or infrastructure that may cause a significant environmental impact. Similarly, the proposed Project would not create a substantial new demand on service providers that would exceed the capacity of local infrastructure. Impacts would be less than significant.

This section evaluates potential environmental impacts of the proposed Commercial Cannabis Business Licensing Program (Project) related to utilities and service systems, including water supply, wastewater, and solid waste. This analysis describes the physical setting for municipal utilities serving unincorporated areas of Los Angeles County and regulations that apply to the supply, treatment, and disposal of water, wastewater, and solid waste.

Other impacts that are related to utilities and service systems involve: energy (e.g., electricity and natural gas) use and efficiency that are discussed in Section 3.2, *Energy*; water quality, hydrologic groundwater, and surface water resources that are discussed in the Initial Study (IS) that was prepared for the proposed Project; public services (e.g., fire protection) is also discussed in the IS (see Appendix A).

A summary of the impacts related to utilities and service systems identified in this Section is provided in Table 3.7-1.

Table 3.7-1. Utilities and Service System Summary of Impacts

Utilities and Service System Impacts	Mitigation Measures	Impact Classification
Impact UT-1. The proposed Project would not require or otherwise result in the relocation, construction, and/or expansion of water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.	None required	Less than significant
Impact UT-2. Sufficient water supplies are available to serve the proposed Project and	None required	Less than significant

reasonably foreseeable future development during normal, dry, and multiple dry years.		
Impact UT-3. The proposed Project is unlikely to result in a wastewater treatment provider determination that the provider does not have adequate capacity to serve a commercial cannabis business that could result from the Project, in addition to the provider's existing commitments.	None required	Less than significant
Impact UT-4. The proposed Project would not generate solid waste that would exceed state or local standards, exceed the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	None required	Less than significant
Impact UT-5. The proposed Project would comply with federal, state, and local statutes and regulations related to solid waste.	None required	Less than significant
Cumulative Impacts	None required	Less than significant

3.7.1 Environmental Setting

Water

Water Agencies and Purveyors

Multiple levels of water agencies participate in securing, storing, and delivering water from its source to end users, such as households and retail customers. These water agencies manage and maintain extensive networks of water infrastructure serving urban and rural communities throughout the county, including water storage, treatment, conveyance, and distribution systems.

Water wholesalers are agencies or private entities that supply large quantities of water to local water providers. For example, in Los Angeles County, the Metropolitan Water District of Southern California (MWD) imports water from the State Water Project (SWP) and the Colorado River and distributes water to its member agencies. Member agencies of MWD include the Central Basin Municipal Water District, Foothill Municipal Water District, Loas Virgenes Municipal Water District, Three Valleys Municipal Water District, Upper San Gabriel Valley Municipal Water District, and the West Basin Municipal Water District (MWD 2021). Other major water wholesalers in the county include Antelope Valley-East Kern Water Agency and the Santa Clarita Valley Water Agency. These water wholesalers rely on imported water, as well as groundwater, surface water, and recycled water.

Lastly, water purveyors provide water to retail customers. The Los Angeles County Waterworks District, a division of the Los Angeles County Department of Public Works (DPW), purchases imported water from local SWP contractors, such as MWD, or regional wholesale water agencies to provide retail water in unincorporated areas. There are six waterworks districts, as listed below:

- District 21, Kagel Canyon, currently serves approximately 550 people through 250 metered connections.
- District 29, Malibu and Topanga, currently serves approximately 22,300 people through 7,500 metered connections.
- The Marina del Rey Water System currently serves approximately 8,800 people through 300 metered connections.
- District 36, Val Verde, currently serves approximately 5,200 people through 1,350 metered connections.
- District 37, Acton, currently serves approximately 6,500 people through 1,400 metered connections.
- District 40, Antelope Valley, currently serves approximately 208,000 people through 57,000 metered connections (DPW 2025g).

Municipal Water Sources

The county relies on several major water sources for municipal supplies, including local surface water, groundwater, imported water, and recycled water supplies (DPW 2025g). Approximately two-thirds of the county's water is imported, while local groundwater resources provide the remaining third.

Surface Water Reservoirs and Groundwater Sources

DPW owns and manages 14 dams and reservoirs that support regional water conservation and flood control efforts. These facilities are designed to capture and temporarily store surface water runoff, while regulating downstream flow rates to prevent channel overflow and optimize groundwater recharge at designated spreading grounds. DPW manages 26 spreading grounds located adjacent to river channels and within soft-bottom channel segments that facilitate the percolation of surface water into underlying groundwater basins. The recharge process supports the replenishment of local aquifers that contribute to the County's municipal groundwater supplies. Table 3.7-2 provides a summary of the estimated capacity and annual draw of the major groundwater sources serving the county.

Table 3.7-2. Local Groundwater Basin Estimated Capacity and Annual Draw

Groundwater Supply Source	Estimated Capacity/Storage (AF)	Estimated Annual Draw (AF)
Antelope Valley	68,000,000	69,000
Santa Clara River Valley - East	1,890,000	21,000
San Fernando Valley (also known as the Upper Los Angeles River Area)	3,670,000	87,000
San Gabriel Valley	8,600,000	161,000
Coastal Plain of Los Angeles	1,100,000	305,000
Total	83,260,000	643,000

Sources: California Department of Water Resources (DWR) 2004a, 2004b, 2004c, 2020, 2024a, 2024b, 2024c; Main San Gabriel Basin Watermaster 2025; Santa Clarita Valley Groundwater Sustainability Agency (GSA) 2025; U.S. Geological Survey (USGS) 2018.

Imported Water

Imported water supplies are conveyed to Los Angeles County in three essential aqueduct systems: the SWP, the Colorado Aqueduct, and the Los Angeles Aqueduct.

The California Department of Water Resources (DWR) owns and manages the SWP, a multi-purpose water storage and delivery system that extends more than 700 miles. The system is a collection of canals, pipelines, reservoirs, and hydroelectric power facilities that deliver clean water to 27 million Californians, 750,000 acres of farmland, and businesses throughout the State (DWR 2025). In Los Angeles County, the SWP delivers water to 29 water agencies, including Antelope Valley-East Kern Water Agency, Castaic Lake Water Agency, MWD, and the San Gabriel Valley Municipal Water District. In addition, MWD imports water via the SWP and wholesales the water to 26 member agencies.

MWD owns and operates the Colorado Aqueduct, a 242-mile channel that transports water from the Colorado River to Southern California. As a wholesale water agency, the MWD distributes water supplies to water districts that serve 18 million customers in Los Angeles, Orange, San Diego, Riverside, San Bernardino, and Ventura counties (DPW 2025g).

The City of Los Angeles Department of Water and Power's Los Angeles Aqueduct draws water from the Owens River, Mono Lake Basin, and reservoirs in the southern Sierra Mountains. The aqueduct delivers approximately 430 million gallons of water a day (DPW 2025g).

Recycled Water

Recycled water is wastewater that is subject to multiple levels of treatment. This processed water is treated to strict standards set by the California Department of Health Services and is rigorously monitored by local, State, and federal agencies to ensure compliance with the standards. The Los Angeles County Sanitation Districts (Sanitation Districts) manages ten water reclamation facilities that produce treated and disinfected water for groundwater replenishment, landscape irrigation, agriculture, and industrial uses. Specifically, in the Fiscal Year 2021-2022, Sanitation Districts produced approximately 166,634 acre-feet per year (AFY) of recycled water, an 8.8 percent increase from the previous fiscal year (Sanitation Districts 2022)

Water Supply and Demand

In accordance with the California Urban Water Management Planning Act (UWMPA), water purveyors serving 3,000 or more service connections or providing more than 3,000 AFY of water supplies are required to prepare an Urban Water Management Plan (UWMP). Each UWMP is required to identify projected future water supply and demand under normal, drought, and multiple-dry year conditions. Table 3.7-3 displays the projected future water

supply and demand under normal conditions for the major water purveyors serving the unincorporated county. Overall, the total water supply decreases approximately 0.86 percent from 4.21 million acre-feet (AF) in 2025 to 4.17 million AF in 2040, while the total water demand remains relatively stable at approximately 1.6 million AF throughout the 2040 horizon year.

While most agencies are projected to experience decreased water supplies and increased water demands, agencies serving the County's desert communities, such as Antelope Valley, Palmdale, and Santa Clarita, are likely to experience more extreme deficits. As such, these agencies are developing programs for additional water supplies. For example, the Santa Clarita Valley Water Agency is actively pursuing additional groundwater supplies through new and recovered wells and expanding their recycled water program (Santa Clarita Valley Water Agency 2021). Further, municipal water districts and retail purveyors are anticipated to increase their reliance on water purchases from the MWD to accommodate water supply demands particularly in multiple dry conditions.

Table 3.7-3. Projected Future Normal Year Conditions for Major Municipal Water Suppliers and Demands Serving Unincorporated Areas of Los Angeles County

Water Supply Agency[1]	Supply and Demand	2025 Projected (AF)	2030 Projected (AF)	2035 Projected (AF)	2040 Projected (AF)	Percent Increase (2025-2040)
MWD	Supply	3,899,000	3,893,000	3,890,000	3,888,000	-0.28%
	Demand	1,427,000	1,388,000	1,362,000	1,378,000	-3.43%
	Difference	*2,472,000*	*2,505,000*	*2,528,000*	*2,510,000*	1.54%
AVEK	Supply	87,890	85,710	83,540	81,370	-7.42%
	Demand	44,440	50,990	51,880	55,210	24.23%
	Difference	*43,450*	*34,720*	*31,660*	*26,160*	-39.79%
Los Angeles County Waterworks District No. 29, Malibu	Supply	9,019	9,254	9,429	9,607	6.52%
	Demand	9,019	9,254	9,429	9,607	6.52%
	Difference	*0*	*0*	*0*	*0*	0.00%
Los Angeles County Waterworks District No. 40: Antelope Valley	Supply	83,086	81,724	80,324	79,024	-4.89%
	Demand	55,164	58,002	61,102	64,402	16.75%
	Difference	*27,922*	*23,722*	*19,222*	*14,622*	-47.63%
Palmdale Water District	Supply	36,725	35,315	35,345	35,375	-3.68%
	Demand	20,220	21,310	22,980	24,780	22.55%
	Difference	*16,505*	*14,005*	*12,365*	*10,595*	-35.81%

Water Supply Agency[1]	Supply and Demand	2025 Projected (AF)	2030 Projected (AF)	2035 Projected (AF)	2040 Projected (AF)	Percent Increase (2025-2040)
Santa Clarita Valley Water Agency	Supply	91,010	80,050	78,877	76,967	-15.43%
	Demand	82,100	89,300	97,600	104,300	27.04%
	Difference	*8,910*	*-9,250*	*-18,723*	*-27,333*	-406.77%
Total	Supply	4,206,730	4,185,053	4,177,515	4,170,343	-0.86%
	Demand	1,637,943	1,616,856	1,604,991	1,636,299	-0.10%
	Difference	*2,568,787*	*2,568,197*	*2,572,524*	*2,534,044*	-1.35%

Sources: MWD 2021; Antelope Valley-East Kern Water Agency 2021; DPW 2021a, 2021b; Palmdale Water District 2021; Santa Clarita Valley Water Agency 2021.

Wastewater

Wastewater Infrastructure

Three wastewater treatment providers serve the unincorporated areas of the county: DPW, the Los Angeles County Sanitation Districts (Sanitary Districts), and the LA Sanitation & Environment (LASAN). These agencies are responsible for the construction, operation, and maintenance of facilities that collect, treat, reuse, and dispose of domestic and industrial wastewater. Sanitary wastewater that is collected for treatment is treated in the following three phases:

- Primary treatment: The removal of solids using setting tanks. Primary treated wastewater has the most limited amount of acceptable uses, due to the treated water still containing many pathogens and organic matter, and primarily serves as the first stage of treatment in a multi-stage treatment process.
- Secondary treatment: The reduction of organic matter using bacteria and oxygen, followed by further removal of solids. Secondary treated wastewater can be approved for various uses, including agricultural irrigation, use in industrial processes, and use in environmental enhancement or restoration.
- Tertiary treatment: The filtration of wastewater to remove any solids remaining after the first two phases of treatment. Tertiary treated wastewater can be approved for the greatest number of uses due to the higher degree of treatment, including urban uses such as street cleaning and toilet flushing.

Los Angeles County Department of Public Works

DPW provides sewer and wastewater services to unincorporated areas of the county, 37 cities, and two contract cities. DPW administers the Los Angeles County Sewer Maintenance District that includes the Consolidated Sewer Maintenance District (CSMD) and the Marina Sewer Maintenance District. Collectively, the CSMD serves over 2 million people with over 4,600 miles of sanitary sewers, 144 pump stations, and four wastewater treatment plants. As

detailed in Table 3.7-4, the Malibu Mesa Water Reclamation Plan is DPW's only tertiary wastewater treatment plan; the remaining treatment plants are secondary wastewater treatment facilities.

Los Angeles County Sanitation Districts

The Sanitary Districts consist of 24 independent special districts that provide wastewater management needs to many unincorporated areas of the county, as well as 78 cities in Los Angeles County. These wastewater management needs include the collection, treatment, and recycling of domestic and industrial wastewater for 5.5 million people in the county. The service area covers approximately 850 square miles with a collection system of 1,400 miles of sewer-sized pipes between 8 and 144 inches in diameter, 48 active pump stations, and 11 wastewater plants. Altogether, the Sanitary Districts manage approximately 500 million gallons per day (gpd).

The Sanitary Districts are also comprised of three wastewater collection systems: the Joint Outfall System, the Santa Clarita Valley Collection System, and the Antelope Valley Collection System.

- The Joint Outfall System (JOS) is a regional, interconnected system of wastewater facilities in the metropolitan Los Angeles area. The JOS provides sewage treatment, water reuse, and disposal for residential, commercial, and industrial uses. The JOS service area includes five million people in 73 cities and unincorporated communities.
- The Santa Clarita Valley Sanitation District owns, operates, and maintains the Santa Clarita Valley Collection System, which consists of a 34-mile long, interconnected network of trunk sewers and two pumping plants. Wastewater and associated solids are conveyed to the Saugus and Valencia Water Reclamation Plants (see Table 3.7-3).
- The Antelope Valley Collection System consists of approximately 100 miles of interconnected trunk sewers within the Palmdale and Lancaster service area, conveying wastewater to the Palmdale Water Reclamation Plant and Lancaster Water Reclamation Plant, respectively.

City of Los Angeles Sanitary Bureau

The LASAN provides wastewater treatment to several unincorporated areas in, and next to, the City of Los Angeles, including unincorporated areas in the Santa Susana Mountains, Simi Hills, and Santa Monica Mountains; Marina del Rey; and La Crescenta-Montrose (County of Los Angeles 2014).

Table 3.7-4. Wastewater Treatment Plants Serving the County

Treatment Plant (Agency)	Type	Design Capacity	Average Daily Flow	Remaining Capacity
Malibu Mesa Water Reclamation Site	Tertiary	200,000 gpd	84,000 gpd	116,000 gpd

Treatment Plant (Agency)	Type	Design Capacity	Average Daily Flow	Remaining Capacity
Lake Hughes Community Wastewater Treatment Plant	Secondary	93,000 gpd	25,000-30,000 gpd	63,000-68,000 gpd
Trancas Water Pollution Control Plant	Secondary	85,000 gpd	42,500 gpd	42,500 gpd
Saugus Water Reclamation Plant	Tertiary	6.5 mgd	5.48 mgd	1.02 mgd
Valencia Water Reclamation Plant	Tertiary	21.6 mgd	15.18 mgd	6.42 mgd
Palmdale Water Reclamation Plant	Tertiary	12 mgd	9.06 mgd	2.94 mgd
Lancaster Water Reclamation Plant	Tertiary	18 mgd	13.44 mgd	4.56 mgd
La Cañada Water Reclamation Plant	Secondary	200,000 gpd	70,000 gpd	130,000 gpd
A.K. Warren Water Resource Facility (previously the Joint Water Pollution Control Plant)	Secondary	400 mgd	245.99 mgd	154.01 mgd
Long Beach Water Reclamation Site	Tertiary	25 mgd	16.38 mgd	8.62 mgd
Los Coyotes Water Reclamation Plant	Tertiary	37.5 mgd	24.06 mgd	13.44 mgd
Pomona Water Reclamation Plant	Tertiary	15 mgd	6.2 mgd	8.8 mgd
San Jose Creek Water Reclamation Plant	Tertiary	100 mgd	66.91 mgd	33.09 mgd
Whittier Narrows Water Reclamation Plant	Tertiary	15 mgd	10.43 mgd	4.57 mgd
Tillman Water Reclamation Plant	Tertiary	80 mgd	41.50 mgd	39.50 mgd
Los Angeles-Glendale Water Reclamation Plant	Tertiary	20 mgd	15.06 mgd	4.94 mgd
Hyperion Treatment Plant	Secondary	450 mgd	243 mgd	207 mgd

Sources: DPW 2024, 2025d, 2025e, 2025f ; Los Angeles Regional Water Quality Control Board (RWQCB) 2019a, 2019b, 2020; Sanitary Districts 2024a, 2024b, 2024c, 2024d, 2024e, 2024f, 2024g, 2024h, 2025a, 2025b, 2025c, 2025d, 2025e, 2025f, 2025g, 2025h, 2025i, 2025j, 2025k, 2025l; Lahontan RWQCB 2022, 2024; LASAN 2024a, 2024b, 2024c; City of Los Angeles 2017, 2025.

Solid Waste

Solid waste generally refers to garbage, refuse, sludge, and other discarded solid materials that come from residential, industrial, and commercial activities. Construction, demolition, and inert waste are also classified as solid waste. The general waste classifications used for

California waste management units, facilities, and disposal sites are Nonhazardous Wastes, Hazardous Wastes, Liquid Wastes, Asbestos Containing Waste, Designated Wastes, and Special Wastes (California Department of Resource Recycling and Recovery [CalRecycle] 2022).

Solid Waste Collection

DPW provides commercial solid waste collection services for unincorporated county businesses through three systems: Garbage Disposal Districts (GDDs); the Non-Exclusive Commercial Franchise system; and the Exclusive Commercial Franchise System (ECF) (DPW 2025a).

Garbage Disposal Districts

There are seven designated GDDs within the unincorporated county where garbage collection and disposal services are provided to businesses and residents by private waste haulers who contract with the County. DPW's Environmental Programs Division oversees the provision of the services, which include trash, recycling, and organic waste collection and disposal, as well as managing the terms of the contract and providing customer service. All properties within the districts are automatically enrolled for the services provided by their respective GDD. The service fees are collected annually on the property tax bills, which are dependent on the customer demand, accessibility of the property, land use type, and contract terms (DPW 2025b).

Table 3.7-5. County Garbage Disposals District and Service Areas

Garbage Disposal District	Service Area
Athens/ Woodcrest/Olivita	Athens-Westmont
Belvedere	East Los Angeles
Florence/Firestone/Willowbrook	Athens Village East Rancho Dominquez Florence-Firestone Rosewood Willowbrook
Lennox	Lennox
Malibu	Santa Monica Mountains
Mesa Heights	Del Rey Ladera Heights View Park/Windsor Hills
Walnut Park	Florence-Firestone Walnut Park

Source: DPW 2024.

Non-Exclusive Commercial Franchises

As of October 2022, the majority of Non-Exclusive Commercial Franchise system customers have transitioned to ECFs. However, a portion of the North County unincorporated communities, including Antelope Valley, Acton, and Agua Dulce, remain under the Non-Exclusive Commercial Franchise indefinitely. In addition, the collection of construction and demolition debris throughout the unincorporated county remains within the system.

Exclusive Commercial Franchises

There are eight ECF service areas within the county. A waste hauler exclusively provides the collection services for trash, recyclables, and organic waste, for each service area. In addition, every customer receives organic waste container(s) for food waste, food-soiled paper, and green waste (DPW 2025a). As of September 2022, there are 27 authorized commercial franchise waste haulers servicing the unincorporated area of the county.

Table 3.7-6. County ECF Service Areas

ECF Service Area	Waste Hauler	Service Area	
Foothills	American Reclamation	Altadena La Crescenta-Montrose	
Gateway	Valley Vista Services	Cerritos East La Mirada East Whittier La Habra Heights Lakewood	Long Beach South Whittier West Whittier/Los Nietos
Puente Hills	Valley Vista Services	Hacienda Heights Rowland Heights	Whittier
San Gabriel Valley East	Valley Vista Services	Avocado Heights Azusa Bassett Charter Oak Claremont Covina Covina (Charter Oak) East Covina Glendora	La Verne North Whittier Padua Hills Pomona San Jose Hills Valinda Walnut West Puente Valley
San Gabriel Valley West	Ware Disposal	Arcadia Bradbury Duarte East Pasadena El Monte Kinneloa Mesa Monrovia Northeast San Gabriel	Pellissier Village San Pasqual South El Monte 12 South San Gabriel Sunrise Village Whittier Narrows

ECF Service Area	Waste Hauler	Service Area	
Santa Clarita Valley	WM-USA Waste of CA, Inc.	Agua Dulce Angeles National Forest Bouquet Canyon Canyon Country Castaic Kagel/Lopez Canyons Newhall Placerita Canyon San Francisquito	Canyon/ Bouquet Canyon Sand Canyon Saugus Saugus/Canyon Country Stevenson Ranch Twin Lakes/Oat Mountain Val Verde
South Bay	WM-USA Waste of CA, Inc	Del Aire El Camino Village Harbor Gateway Hawthorne La Rambla Palos Verdes Peninsula Rancho Dominguez Rosewood/East Gardena	Rosewood/West Rancho Dominguez West Carson West Rancho Dominguez Westfield/Academy Hills Willowbrook Wiseburn

Source: DPW 2024.

Landfills

There are 11 solid waste disposal landfills serving the unincorporated areas of the county, including six in-county and five out-of-county landfills. Collectively, these landfills received over 13,590,000 tons of solid waste and managed an average daily load of approximately 47,100 tons per day (tpd) in 2023. The estimated closure of the facilities ranges between five to over 70 years, with in-county facilities having a remaining capacity of about 123 million tons and out-of-county facilities with a remaining capacity of 351 million cubic yards. Table 3.7-7 and Table 3.7-8 provide a summary of the current operating capacity of landfills serving the county.

Table 3.7-7. Landfills Serving Unincorporated Areas (In-County)

Name	Maximum Permitted Throughput (tpd)	Average Daily Throughput (tpd)	Remaining Daily Throughput Capacity (tpd)	Total Remaining Capacity (tons)	Years Remaining
Antelope Valley Public Landfill	5,548	2,246	3,302	7,800,000	7
Calabasas Sanitary Landfill	3,500	827	2,673	4,100,000	7
Chiquita Canyon Sanitary Landfill	12,000	6,830	5,170	49,300,000	25

Name	Maximum Permitted Throughput (tpd)	Average Daily Throughput (tpd)	Remaining Daily Throughput Capacity (tpd)	Total Remaining Capacity (tons)	Years Remaining
Lancaster Landfill and Recycling Center	5,100	360	4,740	9,700,000	19
Scholl Canyon Landfill	3,400	1,077	2,323	2,500,000	6
Sunshine Canyon City/County Landfill	12,100	7,560	4,540	49,800,000	15
Total	41,648	18,900	22,748	123,200,000	--

Source: DPW 2023; CalRecycle 2025a, 2025b, 2025c, 2025d, 2025e, 2025f.

Table 3.7-8. Landfills Serving Unincorporated Areas (Out-of-County)

Name	Maximum Permitted Throughput (tpd)	Average Daily Throughput (tpd)	Remaining Daily Throughput Capacity (tpd)	Total Remaining Capacity (cubic yards)	Years Remaining
El Sobrante Landfill	16,054	10,186	5,868	121,083,583	26
Lost Hills Environmental, LLC	2,000	1,312	688	3,777,340	5
Olinda Alpha Sanitary Landfill	8,000	6,529	1,471	17,500,000	11
Prima Deshecha Sanitary Landfill	4,000	2,608	1,392	128,800,000	77
Simi Valley Landfill & Recycling Center	64,750	7,599	57,151	79,783,835	38
Total	94,804	28,234	66,570	350,944,758	--

Source: CalRecycle 2020a, 2020b, 2021, 2023a, 2023b; DPW 2023.

DPW continually evaluates landfill management through the preparation of County Integrated Waste Management Plan (IWMP) annual reports and other studies. In the most recent 2021 County IWMP Report, DPW conducted a scenario analysis to address how the County plans to maintain adequate solid waste disposal capacity from 2021 to 2036, taking into account legislation, diversion rate, and landfill capacity. The study concluded that the County's reliance on existing permitted in-county landfill capacity alone is insufficient to meet the County's long-term disposal needs. To maintain adequate disposal capacity, the 2021 County IWMP Report states that the County and individual jurisdictions must pursue the following strategies:

- Maximize waste reduction and diversion, such as expanding or enhancing programs.
- Promote and develop alternatives to landfilling, which include supporting sustainable legislation and establishing partnerships with facilities and technology vendors.
- Develop in-county solid waste processing, transferring, and recycling infrastructure.

- Enhance in-county capacity and out-of-county disposal, such as a waste-by-rail system.

Recycling and Solid Waste Diversion

As further described in Section 3.7.2, *Regulatory Setting*, the County's IWMP and the Zero Waste Plan have established waste diversion goals, objectives, and strategies to meet the waste diversion targets: 80 percent by 2025, 90 percent by 2035, and 95 percent by 2045. According to the 2021 County IWMP, the County has achieved an estimated countywide diversion rate of 65 percent.

There are 51 permitted large volume transfer/processing facilities within the county, including transfer stations, material recovery facilities (MFRs), and construction and demolition (C&D) recycling centers. Collectively, these facilities are permitted to receive, handle, separate, convert, and/or process solid waste with daily throughput capacities ranging between 100 and 5,300 tpd. The Sanitation Districts manage the Puente Hills Materials Recovery Facility (MRF) and South Gate Transfer Station, which have a maximum permitted throughput of 4,400 and 1,000 tpd, respectively. Additionally, DPW serves as a regulatory agency by certifying and monitoring private operations (DPW 2022).

Telecommunications

Telecommunications infrastructure includes small cell facilities and macro towers. Small cell facilities are located on existing or proposed vertical infrastructure, such as streetlights, utility poles, and traffic signal poles in the public right-of-way. Macro towers are large independent structures with the single purpose of supporting telecommunications. These tend to be large mono-towers that are either in the public right-of-way or are on private or public property. Numerous telecommunications providers operate within Los Angeles County and either share infrastructure or own their own facilities to provide cellular service countywide.

3.7.2 Regulatory Setting

Federal Regulations

Clean Water Act

The Federal Water Pollution Control Act, which was expanded in 1972 and now commonly known as the Clean Water Act, is a comprehensive statute aimed at restoring and maintaining the chemical, physical, and biological integrity of the nation's waters, including discharge waters of wastewater treatment processes. The Clean Water Act, in combination with other federal environmental laws, regulates the location, type, planning, and funding of wastewater treatment facilities.

National Pollutant Discharge Elimination System

As authorized by the Clean Water Act, the NPDES program regulates point sources that discharge pollutants into waters of the U.S. Point sources are discrete conveyances such as

pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge, do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. The NPDES permit system is authorized and implemented by states and local water boards.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) ensures the quality of drinking water. The law requires actions to protect drinking water and its sources (rivers, lakes, reservoirs, springs, and groundwater wells) and applies to public water systems serving 25 or more people. It authorizes the U.S. Environmental Protection Agency (USEPA) to set national health-based standards for drinking water to protect against contaminants. In addition, it oversees the states, municipalities, and water suppliers that implement the standards.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the U.S. governing the disposal of solid waste and hazardous waste, as well as the storage and treatment of hazardous waste (refer to Section 3.4, *Hazards and Hazardous Materials*).

State Regulations

California Business and Professions Code, Division 10 (Medicinal and Adult-Use Cannabis Regulation and Safety Act)

Chapter 6, Section 26060.1 of Division 10 of the California Business and Professions Code sets forth certain State licensing requirements for cannabis cultivation which pertain to water usage, if a retail water supplier will provide the water, the water supply includes a diversion within the meaning of Section 5100 of the Water Code, and/or water will be supplied from a groundwater extraction not subject to Section 5100 of the Water Code. It further provides that the Department of Cannabis Control may apply conditions of approval or mitigation measures that the California Department of Fish and Wildlife (CDFW) and/or the State Water Resources Control Board (SWRCB) request to be applied to a State cultivation license for the purposes of protecting fish, wildlife, fish and wildlife habitat, and/or water quality.

Further, Section 26066 of the Water Code provides (in pertinent part) that licensees must conduct indoor cannabis cultivation in accordance with State and local laws related to water usage and water quality. It also directs State agencies, including, but not limited to, the SWRCB and the California regional water quality control boards to address environmental impacts of cannabis cultivation.

California Code of Regulations, Title 4, Division 19, Department of Cannabis Control

The Medicinal and Adult-Use Commercial Cannabis Regulations (California Code of Regulations [CCR], Title 4, Division 19) set forth the requirements for the issuance of State licenses for commercial cannabis operations. Prior to issuance of a State license, the Department of Cannabis Control (DCC) must find that a proposed commercial cannabis operation will comply with the following water-related requirements that apply to:

- Applications for State licenses (Article 2), including: requirements for renewal of provisional licenses (Section 15001.2[d][1]); providing information regarding water-related features of a proposed commercial cannabis cultivation premises (Section 15006[1][h][1] through –[3]); water-related information to comply with the requirements of the California Environmental Quality Act (CEQA) (Section 15010[b][2][B][iii] and -[C][ii]); for cultivators, evidence of enrollment in an order or waiver of waste discharge requirements with the SWRCB or the appropriate Regional Water Quality Control Board (RWQCB) (Section 15011[a][3]); information regarding supplemental water resources (Section 15011[a][3]); and confirmation that a cultivation site is not located in a watershed or other geographic area that the SWRCB or the CDFW has determined to be significantly adversely impacted by cannabis cultivation pursuant to Section 26060(a)(2) of the Business and Professions Code
- Cultivators (Chapter 7), including general environmental protection measures (Section 16304[a][1]), pesticide use (Section 16307[b][8]) and -[9]), and supplemental water sources (Section 16311)
- Manufacturers (Chapter 8), including grounds, building, and manufacturing processes (Section 17209[a][1]) and plumbing systems and fixtures (Section 17209[b][3])

CCR, Title 22, Division 4, Chapter 3 – Water Recycling Criteria

The CCR, Title 22, Division 4, Chapter 3 establishes criteria for reuse of water and use of recycled water, for irrigation, impoundments, cooling, agriculture, and other purposes. Level of treatment and bacteriological water quality standards are used in Title 22 to define what uses are legally allowed, based on the probability of public contact to protect public health. Title 22 identifies uses for a range of wastewater treatment levels, from undisinfected secondary treatment to water that has undergone advanced treatment. Title 22 regulations also specify monitoring and reporting requirements and onsite use area requirements.

CCR, Title 24, Part 5 – California Plumbing Code

Last updated in 2022, the California Plumbing Code is a set of regulations governing the design, installation, maintenance, and inspection of plumbing systems. As described further below, the LACC adopts by reference, augments, and amends certain requirements of the California Plumbing Code and thereby provides the minimum standards to preserve the public health, safety, and welfare by regulating the design, construction, quality of material, and installation of plumbing.

CCR, Title 24, Part 11 – California Green Building Code

Most recently updated in 2022, the California Green Building Code (CALGreen) builds on standards established under CCR, Title 20 by providing water efficiency standards (i.e., maximum flow rates and other water efficiency standards) for certain non-residential development that involves the construction of new, as well as additions to, buildings and/or new landscaping.

California Governors Drought Declarations and Executive Order N-5-23

On April 21, 2021, May 10, 2021, July 8, 2021, and October 19, 2021, Governor Gavin Newsom proclaimed States of Emergency due to multi-year drought conditions that began three years after the record-setting drought of 2012-2016. These proclamations included requirements for the conservation and allocation of water resources to address drought-related impacts to communities across California with vulnerable water supplies, farms that rely on irrigation to grow food and fiber, and fish and wildlife that rely on stream flows and other water resources.

Although certain drought-related conditions remain, recent improvements in conditions caused Governor Gavin Newsom to review past States of Emergency proclamations to identify any regulations that were no longer required or applicable given the changes in drought conditions. As a result, on March 24, 2023, Governor Gavin Newsom issued Executive Order (EO) N-5-23 that specified a number of changes that rescinded or revised certain requirements set forth in past States of Emergency proclamations. Despite the recission of certain requirements, most requirements of the past States of Emergency Proclamations remain in effect (albeit in an amended form).

California Water Code, Division 7, Chapter 3, Section 13149

California Water Code (CWC) Section 13149 directed the SWRCB, in consultation with the CDFW, to adopt principles and guidelines for diversion and use of water for cannabis cultivation in areas where cannabis cultivation may have the potential to substantially affect instream flows. In 2019, the SWRCB complied with this requirement by adopting the "Cannabis Cultivation Policy Principles and Guidelines for Cannabis Cultivation" that sets forth requirements to ensure that the diversion of water and discharge of waste associated with cannabis cultivation does not have a negative impact on water quality, aquatic habitat, riparian habitat, wetlands, and springs. The requirements include principles and guidelines regarding instream flow objectives, limits on diversions, and requirements for screening of diversions and elimination of barriers to fish passage. The principles and guidelines also include requirements that apply to groundwater extractions.

Urban Water Management Planning Act

The Urban Water Management Planning Act (CWC Division 6, Part 2.6, Sections 10610 et seq.) was developed due to concerns over potential water supply shortages throughout California. It requires information on water supply reliability and water use efficiency

measures. Urban water suppliers are required, as part of the Act, to develop and implement UWMPs to describe water supply, service area demand, population trends and efforts to promote efficient use and management of water resources. A UWMP is intended to serve as a water supply and demand planning document that is updated every five years to reflect changes in the water supplier's service area including water supply trends, and conservation and water use efficiency policies. Specifically, municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 AFY must adopt an UWMP.

California Water Plan: Update 2023

Updated every five years, the California Water Plan is the State's strategic plan for sustainably and equitably managing, developing, and stewarding water resources. Required by CWC Section 10005, the plan presents the status and trends of California's water-dependent natural resources; water supplies; and agricultural, urban, and environmental water demands for a range of plausible future scenarios.

California Water Plan Update 2023 (Update 2023) is the current (most recently updated version) of the California Water Plan which focuses on existing water policies, laws and regulations, and initiatives and investments of the Newsom administration's Water Resilience Portfolio (Portfolio), Water Supply Strategy (Strategy), and recent legislation. Update 2023 has three intersecting and interdependent themes — Addressing Climate Urgency, Strengthening Watershed Resilience, and Achieving Equity — which build upon State administrative and legislative policies, priorities, and oversight necessary to create more equitable and climate-resilient water systems to benefit all Californians.

Health and Safety Code, Division 13, Part 1.5, Chapter 2, Section 17921.3

Health and Safety Code Section 17921.3 requires low-flush toilets and urinals in all buildings, including commercial, institutional, and industrial buildings (among others).

California Integrated Waste Management Act

The California Integrated Waste Management Act of 1989 requires local agencies to promote waste management practices, including source reduction, recycling and composting, and environmentally safe transformation and land disposal. In accordance with Public Resources Code, Division 30, Part 2, Chapter 5, each city and county is required to prepare and submit a countywide integrated waste management plan that includes source reduction and recycling elements, household hazardous waste elements, a siting element, and non-disposal facility elements.

In addition, Part 3 outlines the various State waste management programs. Major programs pertain to plastic waste management (Chapter 3, 5.4, 5.5, etc.), electronic waste recycling (Chapter 8.5), recycling of commercial solid waste (Chapter 12.8), and recycling of organic waste (Chapter 12.9).

Safe Drinking Water Act

California enacted its own Safe Drinking Water Act in 1976, which added regulations to the Health and Safety Code, CWC, Government Code, Education Code, and Corporations Code that established minimum standards for drinking and recycled water. The California Department of Public Health (CDPH) is responsible for enforcing key requirements of the Safe Water Drinking Act that are set forth in Health and Safety Code Divisions 37, 101, and 104. In addition, the SWRCB has primary responsibility for administering the requirements that are set forth in the State Water Code Divisions 1, 6, and 7 regarding (among other topics) water shortage emergencies; conservation, development, and utilization of State water resources; water quality; and wholesale regional water system security and reliability. These standards are equal to, or more stringent than, the federal standards and provide specific State requirements for the provision of drinking and recycled water.

Sustainable Groundwater Management Act

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package, composed of Assembly Bill (AB) 1739 (Dickinson), Senate Bill (SB) 1168 (Pavley), and SB 1319 (Pavley) that constitute the Sustainable Groundwater Management Act (SGMA). As stated above, SGMA requires local governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. SGMA requires the formation of groundwater sustainability agencies (GSAs) to manage basins sustainably and requires those GSAs to adopt groundwater sustainability plans (GSPs) for crucial groundwater basins in California. Specifically, SGMA requires these basins to reach sustainability within 20 years of GSAs implementing the required GSPs—except for critically over-drafted basins that must achieve this status by 2040 and high and medium priority basins that must achieve this status by 2042. Within the County, the Santa Clara River Valley East Valley Sub-basin and the Coastal Plain Santa Monica Sub-basin have a Very High and Medium priority status, respectively, and are subject to their respective GSPs.

Water Conservation Act of 2009 (SB x7-7)

SB x7-7 was enacted in November 2009, requiring all water suppliers to increase water use efficiency. The legislation sets an overall goal of reducing per capita urban water use by December 31, 2020, through water use targets for urban water suppliers, water management plans, and best management practices. Urban retailers can achieve the SB x7-7 goal using one of four specified methods:

- Option 1: 80 percent of baseline use (reduction of 20 percent).
- Option 2: Sum of specified performance standards.

- Option 3: 95 percent of California Department of Water Resources Hydrologic Region target from the 20x2020 Water Conservation Plan.[1]
- Option 4: A flexible alternative designed to adjust to local circumstances.

Urban retail water suppliers must monitor and report compliance on an individual or regional basis. Individual urban retail water suppliers are not required to achieve a reduction in urban per capita water use greater than 20 percent. Compliance with the water reduction target is required for continued State water grants and loan eligibility. After 2021, failure of urban retail water suppliers to meet their targets is considered a violation of law for administrative or judicial proceedings.

Regional Regulations

Metropolitan Water District

MWD is composed of 26 member agencies who have preferential rights to purchase water and is the largest water wholesaler for domestic and municipal uses in Southern California. MWD meets water demand through assessments of projected supply and demand through 2040 that are presented in MWD's Regional UWMP. These assessments consider projections for average year conditions, single dry year conditions, and multiple dry year conditions. The 2020 Regional UWMP shows that MWD can provide reliable water supplies under all conditions through 2045 (MWD 2021).

MWD also has prepared an IWRP that provides a water management framework that includes plans and programs for meeting future water needs. The IWRP addresses variables that can affect future water supply such as water quality, climate change, and regulatory and operational changes. MWD adopted the most recent IWRP in January 2016 which establishes a water supply reliability mission of providing its service area with adequate and reliable supply of high-quality water to meet present and future needs in an environmentally and economically responsible way (DPW et al. 2016). The IWRP also includes strategies to meet future water demand.

Local Regulations

County of Los Angeles General Plan

The County of Los Angeles General Plan, Chapter 9, Conservation and Natural Resources Element guides the long-term conservation of natural resources including, but not limited to, local water resources. The Conservation and Natural Resources Element sets forth general goals and policies to: (1) implement a watershed-based planning approach as a

[1] The 20x2020 Plan sets forth a statewide road map to maximize the state's urban water efficiency and conservation opportunities between 2009 and 2020, and beyond. It aims to set in motion a range of activities designed to achieve the 20 percent per capita reduction in urban water demand by 2020. These activities include improving an understanding of the variation in water use across California, promoting legislative initiatives that incentivize water agencies to promote water conservation, and creating evaluation and enforcement mechanisms to assure regional and statewide goals are met. The 20×2020 Plan discusses these many activities in detail (DWR et al. 2010).

method to protect, conserve, and restore resources by utilizing or mimicking natural hydrologic processes; (2) address surface water impairments in compliance with the NPDES Municipal Separate Storm Sewer System (MS4) Permit; and (3) address groundwater impairment and depletion. Several goals and policies of the Conservation and Natural Resources Element applicable to utilities and service systems include:

Goal C/NR 5. Protected and useable local surface water resources.

Goal C/NR 6. Protected and useable ground water resources.

Policy C/NR 6.2. Protect natural groundwater recharge areas and regional spreading grounds.

Policy C/NR 6.5. Prevent stormwater infiltration where inappropriate and unsafe, such as in areas with high seasonal groundwater, on hazardous slopes, within 100 feet of drinking water wells, and in contaminated soils.

In addition to the Conservation and Natural Resources Element, the County of Los Angeles General Plan, Chapter 13, Public Services and Facilities Element, provides general requirements that apply to water supply, sewer, and drainage systems. Section III, *Drinking Water*, sets forth goals and policies to implement water conservation and increase the water supply for unincorporated Los Angeles County. Key goals and policies of the Public Services and Facilities Element that are applicable to utilities and service systems include:

Goal PS/F 2. Increased water conservation efforts.

Policy PS/F 2.1. Support water conservation measures.

Goal PS/F 3. Increased local water supplies through the use of new technologies.

Policy PS/F 3.2. Support the increased production, distribution and use of recycled water, gray water, and rainwater harvesting to provide for groundwater recharge, seawater intrusion barrier injection, irrigation, industrial processes and other beneficial uses.

Goal PS/F 4. Reliable sewer and urban runoff conveyance treatment systems.

Goal PS/F-5. Adequate disposal capacity and minimal waste and pollution.

Policy PS/F 5.5. Reduce the County's waste stream by minimizing waste generation and enhancing diversion.

Policy PS/F 5.7. Encourage the recycling of construction and demolition debris generated by public and private projects.

Policy PS/F 5.8. Ensure adequate and regular waste and recycling collection services.

Los Angeles County Code

The LACC includes ordinances with specific development regulations that complement, and further the actualization of, the general goals and policies provided in the General Plan Conservation and Natural Resources and Public Services and Facilities Elements. Key applicable titles and chapters of the LACC are summarized below.

Title 11 – Health and Safety

Part 2 – Water and Water Wells: The LACC sets forth regulations for the permitting and operation of water systems that produce and/or supply water for human consumption, including standards for water wells, pipelines, and sanitation.

Chapter 11.37.080 – Cannabis Facilities Waste Management Plan: An application for a public health permit for a cannabis facility must include a Waste Management Plan that addresses the storing, handling, disposing, and reuse of all waste by-products and characterizes the volumes and types of waste generated. Cannabis facility operators must use the track-and-trace database and onsite documents to ensure cannabis waste materials are identified, weighed, and tracked while on the cannabis facility premises and when disposed or deposited.

Title 12 – Environmental Protection:

Chapter 12.80 – Stormwater and Runoff Pollution Control: The LACC sets forth regulations for discharges to drainage systems, including discharges from industrial or commercial activities that are prohibited unless found to comply with a NPDES permit.

Chapter 12.84 – LID Standards: The LACC sets forth requirements that augment other county, state, and federal ordinances, statutes, regulations, and other requirements that apply to certain development, for the purpose of: (1) lessening the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters, and other water bodies; (2) minimizing pollutant loadings from impervious surfaces by requiring development projects to incorporate properly designed, technically appropriate best management practices (BMPs) and other Low Impact Development (LID) strategies; and (3) minimizing erosion and other hydrologic impacts on natural drainage systems by requiring certain development projects to incorporate properly designed, technically appropriate hydromodification control development principles and technologies.

Title 20 – Utilities

Division 1 – Water (Water Ordinance): The purpose of the Water Ordinance is to promote and obtain a reasonable minimum level of fire protection performance for water supply facilities constructed, replaced, extended or rehabilitated to serve new subdivisions and residential, commercial, and industrial improvements in the unincorporated area of the County of Los Angeles.

Division 2 – Sanitary Sewers and Industrial Waste (Sanitary Sewer and Industrial Waste Ordinance): The Sanitary Sewer and Industrial Waste Ordinance sets forth the standards, permit requirements, fees, and enforcement provisions that apply to the discharge, deposit, or disposal of wastes, including any material which may cause pollution of underground or surface waters, in, upon, or affecting the unincorporated area of the county; and (in pertinent part) the design, construction, alteration, use and maintenance of public sewers, industrial connection sewers, water pollution control plants, sewage pumping plants, industrial liquid-waste pretreatment plants, and appurtenances.

Division 4 – Solid Waste: The purpose of the Solid Waste Ordinance is to provide minimum standards for solid waste handling and disposal, as well as to create a fee structure for solid waste facilities, collectors, and recovery operations.

Flood Control District Code

Chapter 16 – Los Angeles Region Safe, Clean Water Program and Special Parcel Tax to Provide for Stormwater and Urban Runoff Capture and Reduced Stormwater and Urban Runoff Pollution (Los Angeles Region Safe, Clean Water Program): The Los Angeles Region Safe, Clean Water Program ordinance: (1) imposes a special parcel tax on properties within the boundaries of the Los Angeles Flood Control District at the rate of two and one-half (2.5) cents per square foot of impermeable area (except as exempted); and (2) sets forth the types of programs and projects to increase stormwater and urban runoff capture and reduce stormwater and urban runoff pollution in the Los Angeles Flood Control District (e.g., projects and programs that provide a water supply benefit, water quality benefit, and/or community investment benefit).

Chapter 18 – Safe, Clean Water Program Implementation: Chapter 18 sets forth additional criteria and procedures related to the implementation of the Los Angeles Region Safe, Clean Water Program provided in Chapter 16 of the LACC (described above).

Chapter 21 – Stormwater and Runoff Pollution Control: Chapter 21 of the LACC regulates stormwater and non-stormwater discharges of facilities in the Los Angeles County Flood Control District for the protection of those facilities, the quality of the waters in, and downstream of, those facilities, and the quality of the water that is being stored in water-bearing zones underground. This ordinance specifies discharges that are prohibited and sets forth the minimum standards, guidelines, and/or criteria for specific discharges, connections, and/or BMPs.

Title 22 – Planning and Zoning

Chapter 22.122 – LID: The LACC complements Title 11, Chapter 12.84 by stating that development that is subject to the LID standards must comply with the applicable requirements of Title 12, Chapter 12.84.

Title 28 – Plumbing Code

Chapter 6 – Water Supply and Distribution: The Plumbing Code provides the minimum standards to preserve the public health, safety, and welfare by regulating the design, construction, quality of material, and installation of plumbing. The Plumbing Code incorporates into the LACC by reference, modifies, and augments: (1) Sections 1.2.0 through 1.14.0 of Chapter 1, Division I, of the 2022 California Plumbing Code; and (2) Chapters 2 through 17 and Appendices A, B, D, H, I, and J, of the 2022 California Plumbing Code.

Chapter 7 – Sanitary Drainage: Chapter 7 of the Plumbing Code sets forth the requirements for when buildings must be connected to a public sewer system.

Title 31 – Green Building Standards Code

Title 31 incorporates by reference, augments, and amends certain requirements of the CALGreen Code and sets forth (in pertinent part) both voluntary and mandatory building requirements regarding water efficiency and conservation for nonresidential development.

Integrated Regional Water Management

The Regional Water Management Planning Act of 2002 was established to implement Integrated Regional Water Management (IRWM), or the collaborative effort to manage all aspects of water resources in a region by integrating all facets of water supply, water quality, wastewater treatment, flood management, and stormwater management. As a comprehensive approach to resource management, IRWM is not confined to boundaries of a single water management agency; instead, IRWM crosses jurisdictional, watershed, and political boundaries to facilitate the opportunity to formulate holistic solutions to regional water resource issues.

The County is within the following three IRWM regions:

- The Antelope Valley IRWM Region spans 2,400 square miles in northern Los Angeles County and southeastern Kern County.
- The Upper Santa Clara River IRWM Region includes 654-square miles of the Santa Clara River Watershed that is located in the County.
- The Greater Los Angeles County (GLAC) IRWM Region spans the remainder of the County, including the Los Angeles River, San Gabriel River, Santa Monica Bay, and Dominguez watersheds.

The GLAC Region is divided into five subregions:

- The North Santa Monica Bay subregion spans 203 square miles and includes the Santa Monica Mountains, as well as a portion of southeastern Ventura County.
- The Upper Los Angeles River consists of most of the Los Angeles River Watershed north of the Interstate (I-) 10 freeway in central Los Angeles.
- The Upper San Gabriel and Rio Hondo Subregion consists of the San Gabriel River Watershed north of Whittier Narrows Flood Control Basin, and part of the eastern Los Angeles River Watershed.
- The South Bay Subregion consists of the southeast part of the Santa Monica Bay Watershed and the Dominguez Watershed.
- The Lower San Gabriel and Los Angeles Rivers Subregion includes part of the Los Angeles River Watershed south of I-10 in central Los Angeles, as well as part of the San Gabriel River Watershed south of Whittier Narrows Flood Control Basin.



The County is within three IRWMs: the Antelope Valley IRWM, the Upper Santa Clara River IRWM, and the Greater Los Angeles County IRWMP Region (County of Los Angeles 2014).

Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan

DPW, Los Angeles County Public Works Environmental Programs Division (EPD) prepares and administers the Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan, which provide direction for proper management of all waste generated within the county. As the County's lead agency, it advises the Los Angeles County Board of Supervisors regarding waste management. EPD implements numerous programs to meet State-mandated solid waste reduction goals, including recycling, composting, source-reduction, household hazardous waste management, and public education programs. The following goals are outlined in the County IWMP:

Goal 1. Encourage the continued development of an integrated waste management system that will assist jurisdictions in maximizing waste reduction efforts by enhancing existing programs and services.

Goal 2. Encourage the continued development of an integrated solid waste management system that will assist jurisdictions in maximizing waste reduction efforts by developing new cooperative activities and projects.

Goal 3. Eliminate or reduce barriers and promote intersectional cooperation among jurisdictions, agencies, and the private sector in order to create new opportunities for development and implementation of diversion programs.

Goal 4. Encourage and develop stronger long-term markets and demand for diverted materials and end products.

Goal 5. Increase public awareness of solid waste management (diversion/disposal) issues, and their participation in source reduction, recycling, composting, household hazardous waste management programs, and other waste diversion efforts.

Goal 6. Assure adequate long-term solid waste disposal capacity for the cities and County unincorporated areas.

Goal 7. Demonstrate public leadership in all aspects of solid waste management by implementing appropriate programs and practices within public sector agencies.

Goal 8. Demonstrate public leadership and accountability by assessing and reporting jurisdictional progress in attaining the goals, policies, and objectives listed in the IWMP.

Los Angeles County Zero Waste Plan

The Zero Waste Plan provides recommendations for establishing a sustainable waste management future that shifts away from a reliance on limited landfill capacity. This Plan builds from the 2014 Roadmap to a Sustainable Waste Management Future that initially established the landfill diversion goals of 80 percent by 2025, 90 percent by 2035, and 95+ percent by 2045, while focusing on the environmental, economic, and social impacts of programs on behalf of County residents and communities. In addition, the Plan provides the following, relevant strategies:

Strategy 1 (Programs and Services): Develop, enhance, and expand high-quality responsive programs and services to provide for solid waste management needs while striving to reduce the amount of waste generated and disposed at landfills.

Strategy 2 (Measuring Results): Establish standards and protocols for benchmarking, goal setting, monitoring, and evaluation to enhance the measurement of programs, services, facilities, equitable investments, and infrastructure. Focus on continuous improvement and encourage innovation to reduce, reuse, recycle, and rethink waste.

Strategy 3 (Facilities and Infrastructure): Identify the facility and infrastructure needs for each Focus Area (i.e., County, Unincorporated Areas, County Operations). Encourage the development of state-of-the-art sustainable local waste management facilities and infrastructure in a fiscally, equitably, and environmentally responsible manner.

3.7.3 Impact Assessment Methodology

Significance Thresholds

Appendix G of the CEQA Guidelines establishes thresholds for analyzing a project's impacts on utilities and service systems. Los Angeles County uses these same thresholds and does not maintain thresholds in addition to the ones outlined below. Appendix G states that a project normally would have a significant impact if the project would:

- Require or result in the relocation or construction of, or expanded, water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects;
- Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- 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; and/or
- Not comply with federal, state, and/or local statutes and regulations related to solid waste.

Methodology

The following analysis describes the potential impacts related to the utilities' abilities to serve the demands of commercial cannabis operations that would be licensed under the Program, in addition to existing and anticipated new projects that would rely on the same utilities. Refer to Chapter 3, *Environmental Impact Analysis*, for a detailed discussion of projected cannabis activities in the county due to implementation of the proposed Project. The analysis is based on: (1) a review of the existing utility services providers in the unincorporated area of the county and the existing and projected capacity of utility infrastructure to accommodate new development; (2) the applicable federal, State, and local regulations; and (3) the implementation requirements specific to the proposed Project that would limit adverse impacts of commercial cannabis businesses on utilities and service systems.

3.7.4 Environmental Impact Analysis

UT-1:	The proposed Project would not require or otherwise result in the relocation, construction, and/or expansion of water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.

The proposed Project would establish the Commercial Cannabis Licensing Program that would license cannabis activities that would involve water consumption, wastewater generation, stormwater runoff, electrical power consumption, natural gas consumption, and/or use of telecommunication infrastructure and facilities. However, as described below, commercial cannabis businesses would only be allowed to be located on previously developed lots in areas that currently have utility services, and would be subject to existing regulatory requirements and the proposed LACC Title 22 and Title 8 amendments that would avoid or minimize the demand for the construction of new, and/or expansion of existing, utility systems.

Water Supply Systems

The proposed Project would license commercial cannabis businesses that would require municipal water supplies. Manufacturing, testing, distribution, and retail businesses are anticipated to generate relatively low water demand similar to those of other commercial/mixed-use, industrial, and/or institutional land uses. For example, cannabis testing labs would create a water demand from the use of water as a reagent in testing processes, as well as employees' consumption and use of restrooms.

In contrast, indoor cannabis cultivation has the potential to increase demands on water supply systems. The amount of water required varies depending on several factors, including substrate, plant density and size, room temperature, humidity, light intensity, and facility components, among other factors. In addition, the cultivation method would also factor in water consumption. For example, indoor cultivation can utilize hydroponic methods and recycled irrigation systems to reuse recycled water and generally is the most efficient type of cannabis cultivation in terms of water demand. Under the proposed Project, commercial uses involving outdoor and mixed-light cultivation of cannabis, which tends to generate greater demands for water supplies, would be prohibited.

Although commercial cannabis operations, particularly indoor cultivation, have the potential to increase water demand, all businesses would be subject to the proposed LACC Title 8 and 22 amendments that would limit water demand and the need for the construction of new water infrastructure. First, all commercial cannabis businesses would be restricted to developed lots that have existing infrastructure that provides municipal water service. To be eligible for a permit and license from the County, an applicant must acquire all necessary permit approvals and demonstrate adequacy of service from a municipal water service provider, such as through "can and will serve" letters. Given that non-cultivation activities would have similar water demands as existing land uses (e.g., retail), these business types would likely not require the construction of new, or expansion of existing, water infrastructure. Second, under the proposed Project, the largest-sized indoor cannabis cultivation operations (22,000 square feet per lot) would be allowed an annual water usage of 803,000 – 4,356,000 gallons/year (or 2.46 – 13.37 AFY). Given that all indoor cultivation operations would be located in eligible industrial zones, it is reasonable to assume that future cultivation activities would occur in buildings with existing utility

infrastructure designed to accommodate industrial operations. In some cases, these buildings were previously occupied by water-intensive uses (e.g., food processing or manufacturing) and thereby already possess the necessary water supply capacity to support cultivation. As such, indoor cultivation is unlikely to exceed existing water service capacities or require the construction of new water infrastructure. Impacts would be *less than significant*.

Wastewater Treatment Systems

Although future commercial cannabis businesses would utilize wastewater treatment systems, the Project is not anticipated to generate substantial amounts of wastewater that would require the construction of new, or expansion of existing, infrastructure or systems. Pursuant to the LACC Title 22 amendments, all commercial cannabis businesses would be required to occupy existing buildings that are located on lots within urban and suburban areas that currently receive wastewater collection and treatment services. In addition, commercial cannabis businesses would be permissible solely in zones that are appropriate for commercial cannabis activities, given the stated purposes/objectives of the zones and non-cannabis uses that currently are allowed in the zones. For example, commercial cannabis retail is appropriate in zones that are intended to facilitate (at least, in part) retail commercial uses and would involve wastewater generation rates and demands for wastewater treatment systems (e.g., systems capable of collecting and treating wastewater from employees' and customers' use of restroom facilities) that are similar to other commercial retail uses that currently are allowed in these zones. As such, commercial cannabis retail businesses would be located in zones where existing wastewater infrastructure is capable of collecting and treating wastewater that commercial retail uses generate.

With regard to indoor cannabis cultivation, there is an absence of quantitative information on wastewater generation. However, as described in Section 3.0, *Environmental Impact Analysis,* it is estimated that run-to-waste systems should anticipate wastewater generation to be between 10 to 15 percent of total water use. Using the total water demand identified above, the annual wastewater generation rates for the largest sized indoor cannabis cultivation operation would be approximately 80,300 – 653,400 gallons/year. Indoor cultivation operations that generate 653,400 gallons/year or less would fall within the typical capacity range of existing wastewater infrastructure in most industrial buildings, in which cultivation would be permitted. Industrial facilities are typically designed to accommodate more intensive wastewater demands, such as demands associated with food processing and manufacturing activities. Any development that is required to accommodate wastewater generation would be limited to interior renovations that would not result in a significant environmental impact. Similarly, the proposed Project would not generate a need for new facilities, such as a wastewater treatment plant or new utility mains. Impacts would be *less than significant*.

Stormwater Systems

Given that the proposed Project would restrict new commercial cannabis activities to existing structures, all future development associated with the proposed Project would be limited to minor renovations and alterations. As such, the proposed Project would not involve a substantial increase in impervious surfaces that would generate increased stormwater runoff or the need for new drainage facilities. Further, all 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. Impacts would be *less than significant*.

Energy Systems

The proposed Project would facilitate new commercial cannabis operations that would require energy consumption. As described in Section 3.2, *Energy*, among the various cannabis business types, indoor cultivation involves the highest energy demands due to the use of energy-intensive equipment such as high-intensity light fixtures, fans, climate control systems, carbon dioxide enrichment systems, air circulation and ventilation systems, and water pumps.

However, all commercial cannabis businesses would be subject to existing and proposed regulations related to energy consumption and efficiency. For example, indoor cultivation operations would be limited to existing structures within eligible industrial zones that are equipped to accommodate the energy demands of uses such as indoor cultivation. In addition, all commercial cannabis businesses would be required to comply with applicable energy efficiency standards including, but not limited to, the California Title 24 Building Code, Title 24 CALGreen standards, LACC lighting requirements, the County's General Plan, and any applicable Specific Plan requirements (e.g., LACC 22.410.090.B.2 [East Los Angeles Third Street Form-Based Code Specific Plan General Standards for Transect Zones, Outdoor Lighting]).

Finally, in order to maintain a State license for indoor cultivation, licensees must ensure that electrical power used for cultivation meets the average electricity greenhouse gas (GHG) emissions intensity required by the local utility provider, pursuant to the California Renewables Portfolio Standard Program set forth in the Public Utilities Code (Division 1, Part 1, Chapter 2.3, Article 16, § 399.11 et seq.). If a licensed cultivator's average weighted GHG intensity is greater than the local utility provider's GHG emission intensity, the licensee must obtain carbon offsets to cover the excess in carbon emissions from the previous annual licensed period. The carbon offsets must be purchased from the American Carbon Registry, Climate Action Reserve, and/or Verified Carbon Standard (CCR, Title 4, § 16305). Licensees are required to report their energy source and usage pursuant to these requirements, to renew their State licenses and continue operating.

Therefore, while certain cannabis activities, such as indoor cultivation, may create a demand for electrical energy that may be greater than what otherwise would occur, compliance with the existing and proposed regulatory requirements would avoid creating demand for the construction of new, or expansion of existing, electrical infrastructure, which could result in a significant impact to the environment. Impacts would be *less than significant*.

Natural Gas and Telecommunication Facilities

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.

In summary, all commercial cannabis businesses would be located on existing developed lots that are in areas that currently receive utility services. Commercial cannabis businesses would be subject to existing regulations and the proposed Title 8 and 22 amendments, thereby avoiding or limiting the need for the construction of new, or expansion of existing, utility systems that may result in a significant environmental impact. Impacts would be *less than significant*.

UT-2:	Sufficient water supplies are available to serve the proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years.

The proposed Project would license commercial cannabis businesses that would require the use of municipal water supplies. As described in Impact UT-1, cannabis businesses have different water demands depending on the specific type of commercial cannabis activity in which they are involved. For example, manufacturing, testing, distribution, and retail operations require similar water demands as other commercial/mixed-use, industrial, and/or institutional land uses and would be adequately served during normal and dry years.

In contrast, indoor cannabis cultivation may increase water demands. While indoor cultivation can utilize hydroponic methods and recycled irrigation systems, several factors (e.g., substrate, temperature) can influence the amount of water required. However, the SWRCB and the proposed LACC amendments include policies and other requirements to ensure that the commercial cannabis businesses enabled by the proposed Project would not result in excessive water demand and would enable licensing entities to verify that purveyors can provide water service for each cultivation business, after accounting for existing and anticipated new customers. Pursuant to the SWRCB's Cannabis Cultivation Policy, each cultivation licensee applicant would be required to provide a service agreement from a municipal or permitted water supplier that identifies the water supply source and demonstrates that adequate water supply exists to serve the intended cannabis operations.

In addition, the water demand from indoor cultivation operations would be a negligible amount compared to the County's collective water supply provided across the various water agencies. For example, the MWD estimated its local water supply to be approximately 2,660,000 acre-feet in 2035 (MWD 2021). A single licensee of the largest cultivation operation (e.g., 22,000 square feet per lot) could generate a maximum annual water demand of 2.46 – 13.37 acre-feet per year, or less than 0.001 percent of MWD's water supply. Therefore, there are sufficient water supplies available to serve commercial cannabis activities that could result from the proposed Project and impacts would be *less than significant*.

UT-3:	The proposed Project is unlikely to result in a wastewater treatment provider determination that the provider does not have adequate capacity to serve a commercial cannabis business that could result from the Project, in addition to the provider's existing commitments.

As described in Impact UT-1, the proposed Project is not anticipated to generate substantial amounts of wastewater. Commercial cannabis businesses would be required to be located in existing buildings on lots that are located in zones that already receive wastewater collection and treatment services for similarly situated non-cannabis uses. Manufacturing, testing, distribution, testing, and retail operations would generate wastewater from employees and customers (e.g., use of restrooms) that would be similar to other commercial, industrial, or retail uses. In addition, indoor cultivation generally occurs in controlled, closed-loop environments that are designed for water efficiency, recycling systems, and minimal wastewater generation, which result in minimal run-off or discharge. Indoor cultivation wastewater is comparable to other commercial or light industrial uses.

Given that all future commercial cannabis operations would occur in existing buildings already connected to established wastewater infrastructure, and that these facilities have previously supported land uses with similar wastewater generation profiles, it is reasonable to conclude that the existing wastewater treatment providers possess sufficient capacity to accommodate future cannabis uses. It is unlikely that the wastewater service provider would determine that the cannabis operations would exceed system capabilities or necessitate infrastructure upgrades that otherwise would occur. Lastly, all applicants would be subject to the County's licensing review process that would require a finding of adequate, existing wastewater infrastructure to serve the commercial cannabis activity. Therefore, impacts would be *less than significant*.

UT-4:	The proposed Project would not generate solid waste that would exceed state or local standards, exceed the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Commercial cannabis activities would generate municipal and cannabis waste that would be subject to various State and local regulations. Generally, cannabis operations generate solid waste typical of other similarly sized commercial or light industrial activities (e.g., solid

waste from packaging, office activities, and operational byproducts). All solid waste would be collected and disposed in accordance with State and local regulations, including but not limited to, AB 1826 that requires businesses to recycle or compost their organic waste, and the California Integrated Waste Management Act that requires local jurisdictions to achieve a 50 percent waste diversion rate annually.

In addition, cannabis cultivation would generate green waste and cannabis plant waste (e.g., stems, leaves, roots, soil, and extracted biomass) that are subject to specific management and disposal requirements pursuant to State regulations. For example, CCR Title 4, § 17223, *Waste Management*, requires all cannabis licensees to prepare and implement a cannabis waste management plan that describes the methods by which the licensee would dispose of cannabis waste. Generally, all cannabis or cannabis products that are being disposed of must be: (1) rendered unusable through the grinding and mixing of other materials to prevent diversion into illicit markets; (2) tracked and recorded through the track and trace system; and (3) disposed by an authorized entity, such as a local agency or waste hauler contracted by a local agency.

Lastly, green waste from commercial cannabis operations may be composted and thereby diverted from landfills. Commercial cannabis waste that either cannot or is not composted would be sent to one or more landfills that serve Los Angeles County. As described in Section 3.7.1, *Environmental Setting*, the 11 solid waste disposal landfills serving the unincorporated County have adequate remaining capacity of approximately 123 million tons for in-county facilities and 351 million cubic yards for out-of-county facilities. Therefore, given that local landfills and waste disposal facilities have adequate remaining throughput capacity to receive current and future commercial cannabis business wastes and existing regulations would ensure the appropriate management of all cannabis solid and green waste, impacts would be *less than significant*.

UT-5:	The proposed Project would comply with federal, state, and local statutes and regulations related to solid waste.

As previously described, commercial cannabis licensees must comply with all applicable federal, State, and local regulations related to solid waste management to maintain their State and local licenses. This includes proper segregation, storage, handling, and disposal of cannabis and non-cannabis waste in accordance with DCC Regulations (CCR, Title 4, § 17223), CalRecycle requirements, AB 1826, California Integrated Waste Management Act, etc. Therefore, impacts would be *less than significant*.

3.7.5 Cumulative Impacts

The proposed Project would result in cumulatively considerable impacts if it, in combination with other past, present, and reasonably foreseeable future plans and projects, would result in substantial adverse impacts associated with the County's water supplies and conveyance systems, wastewater collection and treatment systems, energy resources, and/or solid waste services.

Although the proposed Project involves the licensing of commercial cannabis businesses that will create demand for the services that utilities provide, the proposed Project would be subject to existing regulations and the LACC amendments that are the subject of the proposed Project would avoid creating a cumulatively considerable contribution to a significant cumulative impact. For example, the LACC Title 22 amendments would limit commercial cannabis businesses to existing, permitted buildings within eligible zoning districts that are designed to accommodate the utility demand of the respective cannabis operations. Indoor cultivation operations, the commercial cannabis activity with the greatest utility demand among those permitted, would take place in existing industrial-zone structures already served by infrastructure designed for non-cannabis industrial uses with equal or greater service demands. Potential locations for indoor cultivation either currently are, or were previously, occupied by industrial uses of similar utility profiles and possess the necessary infrastructure to support cannabis cultivation. Therefore, future cannabis cultivation operations would not likely exceed utility service capacities, hinder providers (e.g., wastewater treatment providers and water suppliers), or require the construction of infrastructure to accommodate commercial cannabis businesses plus other existing and planned future customers of utilities, which may cause a significant environmental impact.

Further, the proposed LACC Title 8 amendments would limit the total number of licenses and percentage of available licenses that could be issued within the same General Plan Planning Area and Supervisorial District. The spatial requirements regarding the acceptable locations of commercial cannabis businesses, along with the proposed LACC Title 22 eligible zones, would avoid creating a substantial number of commercial cannabis businesses concentrated within any given service area, thereby reducing the potential for localized cumulative impacts regarding water supply demand, wastewater treatment providers, etc.

For these reasons, the proposed Project would not result in a cumulatively considerable contribution to a significant cumulative impact regarding utilities and service systems.

3.7.6 Mitigation Measures

The proposed Project would result in *less than significant* impacts regarding utilities and service systems. Therefore, no mitigation measures are required.

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4.0 ALTERNATIVES ANALYSIS

4.1 INTRODUCTION

California Environmental Quality Act (CEQA) Guidelines § 15126.6 requires an Environmental Impact Report (EIR) to describe a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or lessen any significant environmental impacts while attaining the basic objectives of the project. This chapter describes three potential alternatives to the Commercial Cannabis Business Licensing Program (Project), including the No Project Alternative, analyzes potential environmental impacts resulting from these alternatives, and compares the degree of impact relative to the proposed Project. From this analysis, this chapter also identifies the Environmentally Superior Alternative, consistent with CEQA. The purpose of this section is to provide sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project to inform the County's policy and decision-making process.

Key provisions of the CEQA Guidelines pertaining to the alternatives analysis are summarized below.

- An EIR need not consider every conceivable alternative to a project. Rather, the range of alternatives required in an EIR is governed by a "rule of reason." The EIR is required to set forth only those alternatives that are necessary to permit a reasoned choice and that foster meaningful public participation and informed decision-making. An EIR is not required to consider alternatives that are infeasible or alternatives whose effects cannot be reasonably ascertained and whose implementation is remote and speculative (CEQA Guidelines § 15126.6[a]). Notably, alternatives analyzed in an EIR need not be "actually feasible," but rather need only be "potentially feasible." Whether alternatives are "actually feasible" is a determination made by a lead agency's decision-making body (i.e., County Board of Supervisors) at the time of action on a project based on a variety of factors, including how well alternatives meet the stated project objectives. A decision-making body can reject alternatives on policy grounds provided that its adopted findings addressing feasibility embody a reasonable balancing of competing economic, social, environmental, and other considerations supported by substantial evidence (*California Native Plant Society v. City of Santa Cruz* [2009] 177 Ca. App.4th 957, 998).
- The discussion of alternatives shall focus on alternatives to the project or its location that can avoid or substantially lessen any significant effects of the project, even if those alternatives would impede to some degree the attainment of the project objectives or would be more costly (CEQA Guidelines § 15126.6[b]).
- In selecting a range of potential reasonable alternatives to the project, the lead agency shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially reduce one or more of the significant effects.

Among the factors that a lead agency may use to eliminate alternatives from detailed consideration are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts (CEQA Guidelines § 15126.6[c]).

- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed (CEQA Guidelines § 15126.6[d]).
- The CEQA Guidelines also require an EIR to evaluate a "no project" alternative. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project. The analysis of the "no project" alternative must discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and identify what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans, infrastructure, and community services. As stated in the CEQA Guidelines, when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy, or operation into the future. Typically, this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan (CEQA Guidelines § 15126.6[e][2]-[3][A]).
- The CEQA Guidelines require that the EIR identify an "environmentally superior" alternative among the alternatives analyzed. Pursuant to CEQA Guidelines § 15126.6(e), "if the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." The lead agency is not, however, obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives and/or is infeasible, pursuant to CEQA Guidelines § 15126.6(a), (c), and (f).

4.2 PROJECT OBJECTIVES

The objectives for the proposed Project are presented in Chapter 2, *Project Description*, and reiterated here for reference:

1. Develop a robust and economically viable legal cannabis industry to ensure production and availability of high-quality cannabis products to help meet local demands, and, as a public benefit, improve the County's tax base;
2. Provide opportunities for legal commercial cannabis cultivation, testing, packaging, transportation, distribution, manufacturing, and retail sales in appropriate unincorporated areas of the county, consistent with State law and County regulations;

3. Develop a new regulatory program allowing for the orderly development and oversight of commercial cannabis activities and businesses, consistent with State law and existing agricultural industry practices, standards, and regulations;
4. Encourage commercial cannabis businesses to operate legally and secure a license to operate in full compliance with County and State regulations, maximizing the proportion of licensed activities and minimizing unlicensed activities;
5. Provide an efficient, clear, and streamlined commercial cannabis licensing process and attainable regulations and standards to facilitate participation by commercial cannabis business in the unincorporated areas of the county;
6. Minimize adverse effects of commercial cannabis activities on the natural environment, natural resources, and wildlife, including riparian corridors, wetlands, sensitive habitats, and water resources;
7. Promote energy and resource efficiency in all cannabis activities, consistent with existing agricultural and other industry practices, standards, and regulations;
8. Establish land use requirements for commercial cannabis activities to minimize the risks associated with criminal activity, degradation of visual resources and neighborhood character, groundwater basin overdraft, obnoxious odors, noise nuisances, hazardous materials, and fire hazards;
9. Develop a regulatory program that protects the public health, safety, and welfare through effective enforcement controls (e.g., ensuring adequate law enforcement and fire protection services) for cannabis activities in compliance with State law, to protect neighborhood character and minimize potential negative effects on people, communities, and other components of the environment; and
10. Limit potential for adverse impacts on children and sensitive populations by ensuring compatibility of commercial cannabis activities with surrounding existing land uses, including residential neighborhoods, agricultural operations, youth facilities, recreational amenities, and educational institutions.

4.3 SUMMARY OF POTENTIALLY SIGNIFICANT AND UNAVOIDABLE IMPACTS

Based on the analysis provided in this EIR, the proposed Project would result in potentially significant and unavoidable impacts related to transportation (refer to Section 3.6 *Transportation*) for the following reasons:

Transportation: Commercial cannabis businesses, particularly commercial cannabis retail uses, have the potential to result in trip generation that would exceed the County's vehicle miles traveled (VMT) screening criteria, and therefore have the potential to result in significant and unavoidable impacts to transportation. The implementation of MM TR-1 would require mitigation of VMT impacts on a project-specific level, primarily for cannabis cultivation, non-volatile and volatile manufacturing, testing business types that generate VMT predominately from employee commuter trips. However, due the absence of project-specific details at this time, it cannot be determined that these mitigation measures alone would reduce impacts, particularly those from delivery,

visitor, and inter-business transport trips, to a less than significant level. Furthermore, employer-based Transportation Demand Management (TDM) measures (e.g., rideshare, carpooling, etc.) may be difficult to implement and/or may not be effective in reducing trip generation to a level that is less than significant. No other mitigation measures are considered feasible to reduce VMT impacts of the Project. Therefore, even with the implementation of MM TR-1, VMT impacts would be considered significant and unavoidable.

4.4 ALTERNATIVES SELECTION METHODOLOGY

Consistent with the key provisions of the CEQA Guidelines referenced above, alternatives to the proposed Project were identified, screened, and either retained for further analysis or discarded. Alternatives were developed based on information provided by the County and input received from comments on the NOP. The alternatives screening process consisted of the following steps:

Step 1: Define the alternatives to allow comparative evaluation.

Step 2: Evaluate each alternative using the following criteria:

- The extent to which the alternative would accomplish most of the basic goals and objectives of the project;
- The feasibility of the alternative, considering site suitability, economic viability, availability of infrastructure, General/Local Coastal Plan consistency, and consistency with other applicable plans and regulatory limitations; and
- The extent to which the alternative would avoid or lessen one or more of the significant environmental impacts of the project.

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

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

At the alternatives screening stage, it is not possible to evaluate potential impacts of the alternatives or the proposed Project with any measure of certainty; however, it is possible to identify elements of the proposed Project that are likely to be sources of impacts. A preliminary assessment of potential significant effects of the proposed Project was

completed to develop the alternatives. Additionally, the technical and regulatory feasibility of various potential alternatives was assessed at a general level. Specific feasibility analyses were not needed for this purpose. Any alternative with infeasible characteristics was disregarded. The assessment of feasibility was conducted by using "reverse reason" to identify anything about the alternative that would be infeasible on technical or regulatory grounds. CEQA does not require elimination of a potential alternative based on cost of construction and operation/maintenance. For the proposed Project, characteristics used to eliminate alternatives from further consideration included:

- Limited effectiveness in reducing environmental impacts;
- Feasibility and safety;
- Permitting feasibility;
- Potential adverse effects on resources;
- Potential effects on public health and safety;
- Potential for inconsistency with adopted agency plans and policies;
- Feasibility when compared to other alternatives under consideration; and
- The range of feasible alternatives is selected and discussed in a manner that fosters meaningful public participation and informed decision-making.

4.5 ALTERNATIVES CONSIDERED BUT REJECTED

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

1. Increased Buffers from Certain Uses – This alternative would increase buffers from youth-oriented uses and Drug Abuse and Recovery Treatments Centers from 600 to 800 feet and establish additional buffers from residential uses of 300 feet. All other aspects of the proposed Project would remain unchanged.

   This alternative was deemed infeasible because it would effectively ban commercial cannabis in most unincorporated areas of the county and concentrate them in lower income communities. Increased buffers were analyzed by the Department of Regional Planning (DRP) as far back as 2018, when the DRP examined buffer distances greater than 600 feet from uses such as schools, parks, and libraries as well as buffers from very common uses such as residential areas and places of worship.[1] Their analysis revealed that, *"large buffers and buffers from very common uses either resulted in a de facto ban on cannabis businesses, or concentrated uses in industrial and industrial-adjacent areas, which tend to be lower income neighborhoods in the First and Second*

[1] https://file.lacounty.gov/SDSInter/bos/bc/1039228_2017-06-19CannabisReceiveandFileReportSIGNEDforBOS.pdf

Supervisorial Districts, and in the Antelope Valley in the Fifth Supervisorial District, where properties tend to be relatively large and spread apart." With so few eligible parcels, it would both prevent a reasonable number of businesses from identifying a viable location which would not be consistent with Project Objectives and lead to equity concerns by concentrating businesses in certain areas.

2. Continued Prohibition on Cannabis Cultivation – This alternative would maintain a prohibition on commercial cannabis cultivation of any kind in the unincorporated areas of the county.

   This alternative would fail to meet most of the Project Objectives. Prohibition would prevent the development of a legal, economically viable cannabis industry, which would likely eliminate opportunities to generate tax revenue and ensure a safe, regulated supply of cannabis. It would also fail to provide pathways for legal cultivation, leaving a significant portion of demand to be met through unlicensed activities with higher risks of environmental harm and public safety concerns, or through the import of raw cannabis product from licensed cultivators located outside of the county which could generate greater VMT and associated criteria and greenhouse gas (GHG) emissions from the transport of cannabis products. This alternative would undermine the County's ability to establish effective land use controls and enforcement mechanisms for commercial cannabis within the county.

3. Discretionary Approvals – This alternative would require a Conditional Use Permit (CUP), rather than a ministerial Site Plan Review as is the case with the proposed Project, as the required land use entitlement for storefront retail and/or cultivation activities. CUPs are discretionary entitlements that are subject to CEQA environmental review and require decision-makers to consider certain, subjective characteristics of a project prior to deciding whether to approve the project.

   The alternative was considered but rejected because it would not meet most of the Project Objectives. Discretionary approval of a CUP is a lengthy, complex, and resource-intensive process, with processing times ranging from about 9 months for simple projects to several years for more complex ones, all while applicants must continue paying rent or mortgage to maintain site control. This would undermine the objective of creating a streamlined and efficient licensing process. The discretionary and subjective nature of CUPs could also lead to inconsistent outcomes, where similar businesses are treated differently based on their location, resulting in a patchwork of conditions across the county. This uncertainty and delay would likely discourage participation in the legal market and limit the County's ability to minimize unlicensed activity, establish uniform land use requirements, and ensure consistent protection for public health, safety, and sensitive populations.

4.6 ALTERNATIVES CONSIDERED AND ANALYZED IN THIS EIR

A reasonable range of alternatives considered by the County with the potential to attain the basic objectives of the proposed Project but avoid or substantially reduce impacts is analyzed below. Each alternative is discussed in relation to the objectives of the proposed Project. Alternatives selected for analysis include:

- No Project Alternative
- Alternative 1 – Reduce Retail and Delivery Eligibility in Commercial and Mixed-Use Zones
- Alternative 2 – Prohibit Volatile Manufacturing

A detailed description of each of these alternatives, along with discussion of environmental impacts under each alternative in comparison to the proposed Project is provided below.

4.6.1 No Project Alternative

The proposed Project involves amendments to the Los Angeles County Code (LACC) to establish a new regulatory program that would permit and license certain commercial cannabis businesses in eligible zone districts in the unincorporated county while prohibiting others. Additionally, these amendments would establish operating requirements to protect public health and annual renewal and monitoring requirements to ensure cannabis businesses comply with local and state regulations. The proposed Project would also 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 disadvantaged communities. Without the proposed Project, the No Project Alternative would entail the continued implementation of the existing LACC regulations that currently prohibit all commercial cannabis activities in the unincorporated county.

As described in Chapter 2, *Project Description*, commercial cannabis activities are currently prohibited within the unincorporated county and there are no legal cannabis businesses in the unincorporated county. As of June 2025, County law enforcement records and public complaints indicated that approximately 140 illegal cannabis businesses were operating in unincorporated areas of the County. The No Project Alternative would not address these illegal cannabis activities, nor would it offer an avenue for licensing and permitting, and such activities would likely continue to operate and potentially expand. Under the No Project Alternative, existing County law enforcement, as well as state and federal enforcement agencies, would continue to address illegal cannabis operations on a primarily complaint-driven and call-for-service basis. Nevertheless, even with local, state, and federal participation in cannabis law enforcement, as well as state-level regulations and programs developed from the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), the illicit cultivation, manufacturing, distribution, and sale of cannabis in California and the county would likely continue. Therefore, there would be no orderly licensing, nor oversight of cannabis activities within the unincorporated county, with potential for expanded illegal activities.

Potential Environmental Impacts

Under the No Project Alternative, regulations for permitted commercial cannabis businesses would not be adopted and licenses for legal commercial cannabis businesses would not be issued in the County, thereby preventing local cannabis business from attaining state-level licenses. While many direct impacts associated with the proposed Project would be avoided, as described in Chapter 2, *Project Description*, and Chapter 3, *Environmental Impact Analysis*, illicit and unregulated cannabis activities have to the potential to result in significant environmental impacts, particularly due to the lack of oversight and regulation as well as the need for operators to conceal such activities. While it is not known to what extent such illegal activities would continue or expand, the long history of such activities in the county, strong interest in industry expansion, tremendous financial incentive, and lack of resources available for effective enforcement could indicate a potential for significant expansion of illegal activities. Such illicit and unregulated activities could create impacts related to air quality, odor, energy, GHG emissions, hazards, transportation, and utilities (particularly electricity). Under the No Project Alternative, illicit and unregulated cannabis activities would likely continue and expand, resulting in corresponding environmental impacts that would not be subject to the policies and development standards of the proposed LACC Title 8 and Title 22 amendments or to any mitigation measures identified for the proposed Project. Continuing unlicensed cannabis activities would be expected to result in land use conflicts, exacerbate land use compatibility, quality of life, and code compliance enforcement issues. Impacts to specific resources are discussed further herein.

Given these factors, successful implementation of cannabis prohibition may not be realistic, would not meet Project Objectives, and may create substantially more severe impacts than expansion of the industry under a well-regulated licensing program.

Air Quality

As described in Chapter 2, *Project Description*, the proposed Project does not involve substantial construction or redevelopment necessary to support commercial cannabis businesses. Under the No Project Alternative, short-term construction-related criteria pollutant impacts would also not occur. However, continued, or potentially increased, illicit and unregulated cannabis operations under the No Project Alternative are expected to generate greater construction-related emissions, including dust (particulate matter), diesel, and volatile organic compound (VOC) emissions. Construction-related impacts under the No Project Alternative would be expected to be more severe than those described for the proposed Project.

Under the No Project Alternative, direct increases in operational criteria air pollutant emissions resulting from licensed commercial cannabis businesses would not occur. However, illicit and unregulated cannabis activities would continue to emit criteria air pollutants and produce objectionable odors. It is reasonable to assume that continued, and potentially increased, illicit and unregulated cannabis activities would not comply with

County standards and regulations. As such, air pollution and objectionable odor impacts would likely continue and/or worsen as a result of, diesel or gasoline generators, lack of use of commercial air scrubbers on indoor cultivation or manufacturing operations, and lack of setbacks such that the strong odor associated with cannabis, especially during the flowering phase, does not disturb nearby sensitive receptors. Unregulated manufacturing operations would likely continue to involve activities that contribute to harmful air emissions from the release of combustion materials or other volatile gases. As these illicit and unregulated activities would be ongoing without the availability of enforcement resources from the proposed commercial cannabis licensing program, operational impacts related to criteria air pollutant emissions and objectionable odors would be potentially more adverse than those described for the proposed Project.

Energy

Under the No Project Alternative, no new commercial cannabis businesses would be established, and there would be no associated direct increase in energy demand from indoor cannabis cultivation, manufacturing, retail, or testing operations. However, without the regulation and enforcement resources associated with the proposed Project, illicit and unregulated cannabis activities would be expected to continue and potentially increase, resulting in the continued consumption of high levels of nonrenewable energy resources, particularly related to the use of electricity and the consumption of diesel and gasoline fuels for the powering of portable generators. Therefore, energy impacts would be potentially more adverse than those described for the proposed Project.

Greenhouse Gas (GHG) Emissions

As described in Chapter 2, *Project Description*, the proposed Project does not involve substantial construction or redevelopment to support commercial cannabis businesses. Under the No Project Alternative, short-term construction-related GHG impacts would also not occur. However, continued or increased illicit and unregulated cannabis operations under the No Project Alternative are expected to generate greater construction-related GHG emissions and more severe impacts than those described for the proposed Project.

As described for operational air quality and energy impacts under the No Project Alternative, illicit and unregulated cannabis activities would also contribute to increased GHG emissions from high energy demand, including both from public utilities energy providers and the use of portable diesel and gasoline generators on a stationary basis for extended periods of time as a site's main energy source. Vehicles and water demand would further contribute to GHG emissions from illicit and unregulated cannabis activities. Therefore, without the regulation and enforcement resources associated with the proposed Project, impacts related to GHG emissions and produced by continued and future operation of unregulated cannabis cultivation and/or manufacturing sites, and their associated infrastructure would likely be potentially more adverse than those described for the proposed Project.

Hazards and Hazardous Materials

Under the No Project Alternative, licensed cannabis activities would not occur; therefore, direct impacts to hazards and hazardous materials, such as those associated with the prior use, storage, or discharge of hazardous materials on sites that could otherwise support regulated cannabis operations, would not take place. However, impacts to hazards and hazardous materials would result from ongoing unregulated cannabis operations countywide. Unlicensed cannabis activities generally involve the storage and/or discharge of hazardous materials, including fuels, oils, pesticides, and fertilizers. Unlicensed cannabis activity sites also have a high potential to involve operations that increase fire hazards, including use of machinery, faulty electric power, and increased human presence onsite in remote and heavily vegetated areas. As compared to the proposed Project, illegal cannabis businesses have a higher likelihood of being located on contaminated sites, such as former oil and gas pipelines or above underground storage tanks that may release contamination as a result of ground disturbance. Additionally, some types of cannabis product manufacturing involve storage and use of flammable and explosive materials (e.g., compressed liquefied petroleum gases) that would continue to occur unregulated under the No Project Alternative. Further, risky butane honey oil (BHO) extraction labs within the rural regions, where operations are less prone to be discovered, may be concentrated in areas that are not subject to adequate emergency response services or evacuation plans. These sites pose increased risk to workers and residents in the event of wildfires. Unregulated facilities operating near sensitive receptors would also have the potential to expose significant populations to hazards or hazardous materials. Given the uncertainty of the locations and nature of unlicensed cannabis activities, as well as the inability to effectively ensure compliance with existing safety-related policies and regulations, adverse impacts to hazards and hazardous materials would be potentially more adverse than the proposed Project.

Land Use and Planning

Under the No Project Alternative, no amendments to the LACC would occur; therefore, direct land use and planning impacts associated with licensing cannabis activities would be avoided. However, potential impacts related to land use and planning policy consistency under the No Project Alternative could indirectly result from land use conflicts related to illicit and unregulated cannabis activities. With continued and future unlicensed cannabis activities, impacts to surrounding land uses, neighborhood character, and quality of life issues would likely continue or intensify under this alternative. Such impacts may involve but are not limited to non-residential activities within a residentially zoned neighborhood; high intensity commercial and manufacturing uses in low density or rural areas; nighttime activities generating light, noise, and traffic impacts in an area with sensitive populations; and intrusion of cannabis-related activities in recreational or educational areas heavily populated by children. Such neighborhood compatibility issues would also conflict with the LACC and zoning regulations. Without a cannabis licensing program, standards to ensure

land use compatibility would not be implemented and therefore, impacts would be potentially more adverse than those described for the proposed Project.

Transportation

Under the No Project Alternative, there would be no direct impacts to transportation from the generation of new employee and commercial vehicle trips resulting from licensed cannabis activities such as: (1) impacts related to traffic and daily VMT; (2) inconsistency with plans and policies regarding public transit, bicycle, and pedestrian facilities; and (3) generation or exacerbation of circulation safety hazards. However, ongoing or expanded illicit and unregulated cannabis activities could adversely affect the circulation network throughout the county. For instance, to avoid enforcement and incrimination, the number of cannabis businesses which may operate in areas with inadequate emergency access or in areas with unsafe roadway features or potential traffic hazards may increase under the No Project Alternative compared to the proposed Project. Without a process or standards to ensure adequate access for all users of these roadways, operations that generate traffic from employees and that utilize private undeveloped roads or access rural roads within the county may introduce or exacerbate traffic safety hazards and conflict with users of the same roadways. Trips generated from illicit and unregulated cannabis activities would also have the potential to exacerbate traffic congestion on local roads and highways already operating at or near unacceptable levels. Therefore, unlicensed operations have the potential to exacerbate impacts related to transportation and traffic more than the proposed Project, due to the lack of ability to identify and mitigate or address potential adverse effects.

Utilities and Service Systems

Under the No Project Alternative, there would be no direct impacts to utilities and service systems from licensed cannabis activities such as those related to: (1) demand for water supplies and services, wastewater treatment, and solid waste disposal services; and (2) inconsistency with existing energy standards and conservation policies, would be avoided. However, the No Project Alternative likely would result in a greater number of unlicensed cannabis activities than under the proposed Project, which would result in greater adverse indirect impacts to water, wastewater, and solid waste services or infrastructure. While the cannabis industry may not reach a level that is anticipated under the proposed Project, and would likely result in reduced overall demand for utility services and supplies, illegal operations would occur without compliance with LACC or zoning regulations, and could include unregulated groundwater or surface water diversion, improper disposal and treatment/non-treatment of wastewater generated onsite, or the improper storage, handling, and disposal of municipal solid waste, as well as cannabis plant waste products. Therefore, the No Project Alternative would result in potentially more adverse impacts to utilities and service systems than those described for the proposed Project.

4.6.2 Alternative 1 – Reduce Retail and Delivery Eligibility in Commercial and Mixed-Use Zones

Under Alternative 1, the County would revise the list of eligible base zoning for each of the cannabis business types. Specifically, in comparison to the proposed Project, this alternative would prohibit storefront retail and delivery (retail, non-storefront) uses in Neighborhood Commercial (C-2) and Mixed-Use Commercial Only (MXD), and would expand eligible zones for storefront retail to include Restricted Heavy Manufacturing (M-1.5), Heavy Manufacturing (M-2) zones. Under Alternative 1, storefront retail and delivery uses would continue to be eligible in General Commercial (C-3), Commercial Manufacturing (C-M), and Light Manufacturing (M-1). Delivery uses would also continue to be eligible within Restricted Heavy Manufacturing (M-1.5) and Heavy Manufacturing (M-2) zones. All other uses and eligible zones would remain as described for the proposed Project. These changes in eligible base zoning for retail and delivery uses under this alternative would also result in changes to the cannabis business type eligibility within equivalent Specific Plan (SP) zones.

Table 4-1 below identifies the cannabis business types and base zoning eligibility, while Tables 4-2 through 4-4 identify the cannabis business types and equivalent SP zoning eligibility under this alternative.

Table 4-1. Eligible Zoning Under Alternative 1

Cannabis Business Type	C-2	C-3	C-M	M-1	M-1.5	M-2	IT	MXD**
Cultivation	-	-	-	X	X	X	-	-
Distribution	-	-	X	X	X	X	-	-
Volatile Manufacturing	-	-	-	X	X	X	-	-
Non-Volatile Manufacturing	-	X	X	X	X	X	-	-
Testing	-	X	X	X	X	X	X	-
Retail, Storefront	-	X	X	X	X	X	-	-
Retail, Non-Storefront	-	X	X	X	X	X	-	-
Microbusinesses	-	-	X	X	X	X	-	-

Note: Highlighted cells indicate differences in eligible zoning compared to the proposed Project.

Table 4-2. Alternative 1: Allowable Cannabis Business Types in the Areas Subject to the Connect Southwest, East Los Angeles 3rd Street, and Florence-Firestone Transit Oriented District Specific Plans

Commercial Cannabis Activity	Connect Southwest Los Angeles Specific Plan Zones			East Los Angeles 3rd Street Specific Plan Zones					Florence-Firestone Transit-Oriented District Specific Plan Zones										
	NC	MXD-1	MXD-2	NC	TOD	CC	FS	AB	C-2	C-3	C-M	IX	M-1	M-2	MXD	MU-1	MU-2	MU-3	MU-T
Cultivation, Nursery, Processing, Indoor Only	-	-	-	-	-	-	-	-	-	-	-	X	X	X	-	-	-	-	-
Distribution	-	-	-	-	-	-	-	-	-	-	X	X	X	X	-	-	-	-	-
Manufacturing, Volatile	-	-	-	-	-	-	-	-	-	-	-	-	X	X	-	-	-	-	-
Manufacturing, Nonvolatile	-	-	-	-	-	-	-	-	-	X	X	X	X	X	-	-	-	-	-
Testing	-	-	-	-	-	-	-	-	-	X	X	X	X	X	-	-	-	-	-
Retail, Storefront	-	-	-	-	-	-	-	-	-	X	X	X	X	X	-	-	-	-	-
Retail, Non-Storefront	-	-	-	-	-	-	-	-	-	X	X	X	X	X	-	-	-	-	-
Microbusiness	-	-	-	-	-	-	-	-	-	-	X	X	X	X	-	-	-	-	-
Events	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Note: Highlighted cells indicate differences in eligible zoning compared to the proposed Project.

Key to Connect Southwest Los Angeles Specific Plan Zones:
NC = Neighborhood Commercial
MXD-1 = Mixed Use Development 1
MXD-2 = Mixed Use Development 2

Key to East Los Angeles 3rd Street Specific Plan Zones:
TOD = 3rd Street
CC = Cesar Chavez Avenue
FS = First Street
AB = Atlantic Boulevard

Key to Florence-Firestone Transit-Oriented District Specific Plan Zones:
C-2 = Neighborhood Commercial
C-3 = General Commercial
C-M = Commercial Manufacturing
IX = Industrial Mix
M-1 = Light Manufacturing
M-2 = Heavy Manufacturing
MXD = Mixed-Use Development
MU-1 = Mixed-Use 1
MU-2 = Mixed-Use 2
MU-3 = Mixed-Use 3
MU-T = Mixed-Use Transit

Table 4-3. Alternative 1: Allowable Cannabis Business Types in the Areas Subject to the Marina del Rey, Newhall Ranch, and Northlake Specific Plans

Commercial Cannabis Activity	Marina Del Ray Specific Plan Zones		Newhall Ranch Specific Plan Zones				Northlake Specific Plan Zones		
	VS/CC	O	VS	C	BP	MU	C-C	C-H	I
Cultivation, Nursery, Processing, Indoor Only	-	-	-	-	-	-	-	-	X
Distribution	-	-	-	-	-	-	-	-	X
Manufacturing, Volatile	-	-	-	-	-	-	-	-	X
Manufacturing, Nonvolatile	-	-	-	-	-	-	-	X	X
Testing	-	X	-	-	-	-	-	X	X
Retail, Storefront	-	-	-	-	-	-	-	X	X
Retail, Non-Storefront	-	-	-	-	-	-	-	X	X
Microbusiness	-	-	-	-	-	-	-	-	X
Events	-	-	-	-	-	-	-	-	-

Note: Highlighted cells indicate differences in eligible zoning compared to the proposed Project.

Key to Marina Del Ray Specific Plan Zones:
VS/CC = Visitor Serving/Convenience Commercial
O = Office

Key to Newhall Ranch Specific Plan Zones:
VS = Visitor Serving
C = Commercial
BP = Business Park
MU = Mixed Use

Key to Northlake Specific Plan Zones:
C-C = Community Commercial
C-H = Highway Commercial
I = Light Industrial

Table 4-4. Alternative 1: Allowable Cannabis Business Types in the Areas Subject to the West Carson Transit District and Willowbrook Transit Oriented District Specific Plans

Commercial Cannabis Activity	West Carson Transit Oriented District Zones						Willowbrook Transit Oriented District Zones		
	NC	UC	IF	APV	MU-1	MU-2	Imperial Commercial	MU-1	MU-2
Cultivation, Nursery, Processing, Indoor Only	-	-	-	-	-	-	-	-	-
Distribution	-	-	-	-	-	-	-	-	-
Manufacturing, Volatile	-	-	-	-	-	-	-	-	-
Manufacturing, Nonvolatile	-	X	X	X	-	-	X	-	-
Testing	-	X	X	X	-	-	X	-	-
Retail, Storefront	-	X	X	X	-	-	X	-	-
Retail, Non-Storefront	-	X	X	X	-	-	X	-	-
Microbusiness	-	-	X	X	-	-	-	-	-
Events	-	-	-	-	-	-	-	-	-

Note: Highlighted cells indicate differences in eligible zoning compared to the proposed Project.

Key to West Carson Transit Oriented District Zones:
NC = Neighborhood Commercial
UC = Unlimited Commercial
IF = Industrial Flex
APV = Alpine Village Zone
MU-1 = Mixed Use Development 1
MU-2 = Mixed Use Development 2

Key to Willowbrook Transit Oriented District Zones:
MU-1 = Mixed Use 1
MU-2 = Mixed Use 2

This alternative affects areas of eligibility for cannabis storefront retail and delivery uses by primarily narrowing the zones where these uses are permitted. Under the proposed Project, retail and delivery businesses could be located in a broad range of commercial (C-2, C-3, C-M), mixed-use, and industrial zones (M-1, M-1.5, M-2), supporting more widespread geographic access and distribution. In contrast, Alternative 1 would place greater restrictions on eligible zone districts, thereby reducing the area of eligibility for certain uses and narrowing the geographic access and distribution of licensed, legal cannabis products. All other components of the proposed Project would continue to be implemented under this alternative.

Nevertheless, Alternative 1 is considered feasible because restricting businesses to industrial and C-3 zones, while reducing eligibility, would avoid potential over-concentrations in residential areas, while still avoiding a de-facto ban on cannabis storefront retail and delivery uses. Alternative 1 also addresses community feedback by prohibiting retailers in high-visibility pedestrian areas and could also reduce impacts related to traffic and parking.

Potential Environmental Impacts

Under Alternative 1, there could be decreases in the number of parcels eligible for storefront retail and delivery businesses. While potentially reducing over-concentration of these uses in commercial and mixed-use zones, this could cause over-concentration in other areas where most industrial zones are located (i.e., 1st, 2nd, and 5th Supervisorial Districts). This alternative would also limit access to legal, tested cannabis in areas with few industrial zones.

Air Quality

Under Alternative 1, limiting cannabis retail and delivery businesses to higher intensity commercial and industrial zones could reduce the exposure of sensitive receptors (e.g., residences, schools, or parks) to criteria air pollutant emissions and odors. This could help avoid localized air quality impacts in pedestrian-oriented, mixed-use, or residential neighborhoods. However, concentrating cannabis retail and delivery businesses in industrial areas may also result in higher cumulative emissions in those districts, particularly if multiple businesses cluster in close proximity. While increased vehicle trips, energy use, and facility operations in these concentrated areas could incrementally elevate criteria air pollutant emissions (e.g., nitrous oxides [NO_x], VOCs, and particulate matter [PM_{10} and $PM_{2.5}$]), emissions from individual cannabis businesses are expected to remain well below South Coast Air Quality Management District (SCAQMD) significance thresholds. Seeing that all other components of the proposed Project would continue to be implemented under this alternative, potential impacts associated with Alternative 1 are expected to be similar to the proposed Project and would be *less than significant*.

Energy

Alternative 1 would concentrate cannabis operations in fewer, typically industrial locations. Industrial zones can be considered better equipped with robust energy infrastructure, which may facilitate efficient delivery and management for energy-intensive cannabis operations. However, the clustering of businesses in industrial areas could also result in localized increases in electricity and natural gas consumption, potentially straining existing infrastructure if multiple high-demand operations are sited in close proximity. Because the incremental energy demand from cannabis businesses would be negligible compared to countywide energy consumption, the overall number of licenses would be the same as under the proposed Project, and all operations would be required to comply with stringent energy efficiency standards and renewable energy requirements, impacts are expected to be similar to the proposed Project and would be *less than significant.*

Greenhouse Gas (GHG) Emissions

Alternative 1 would limit cannabis retail and delivery businesses to industrial zones, which may reduce vehicle trip lengths for employees and customers in those areas, potentially lowering transportation-related GHG emissions. While the clustering of businesses in select industrial corridors could result in localized increases in energy demand, cannabis retail and delivery businesses are not considered GHG-intensive cannabis activities as compared to indoor cultivation or manufacturing. Like the proposed Project, all cannabis activities under Alternative 1 would be required to comply with stringent energy efficiency standards and renewable energy requirements identified by local and state regulations. Therefore, impacts are expected to be similar to the proposed Project and would be *less than significant*.

Hazards and Hazardous Materials

Under Alternative 1, the reduction in eligible areas for storefront retail and delivery cannabis businesses would concentrate cannabis operations in fewer, typically industrial locations. Limiting additional cannabis businesses such as retail and delivery to primarily industrial zones, which are considered to be designed and regulated for potentially hazardous uses, would keep potential hazards away from sensitive receptors. Industrial zones typically have more robust infrastructure, emergency response capabilities, and regulatory oversight, which can help mitigate risks associated with hazardous materials, accidental releases, and fire hazards. This approach also reduces the likelihood of hazardous materials being used, stored, or transported in pedestrian-oriented or residential-adjacent areas, thereby lowering public exposure and risk.

However, the concentration of cannabis businesses in select industrial corridors could result in localized increases in the use, storage, and transport of hazardous materials, potentially elevating cumulative risks in those districts. If multiple high-risk operations, such as volatile manufacturing, delivery, and retail are clustered together, there may be a greater potential for accidents, spills, or fire hazards, especially if existing emergency response resources are not scaled to meet increased demand. Additionally, some industrial zones may be located near existing hazardous materials sites, increasing the complexity of site management and

remediation requirements. Despite these localized risks, all cannabis businesses would be subject to stringent federal, state, and local regulations—including hazardous materials business plans, fire code compliance, and buffer requirements—which are designed to minimize adverse impacts. Therefore, impacts are considered to be similar to the proposed Project and would be *less than significant*.

Land Use and Planning

Alternative 1 would restrict cannabis retail and delivery businesses to C-3 and higher commercial and industrial zones, excluding them from neighborhood commercial and mixed-use zones. This alternative would concentrate cannabis operations in fewer, typically industrial locations and remove them from more pedestrian-oriented, mixed-use, and neighborhood commercial areas. This would reinforce land use compatibility by ensuring that cannabis businesses are sited in areas already designed for higher-intensity commercial and industrial activities, away from sensitive receptors such as residences, schools, and parks. This alternative would support General Plan policies that discourage incompatible development in residential and rural areas and protect sensitive land uses. By limiting cannabis businesses to robustly regulated industrial corridors, Alternative 1 would help preserve the character of neighborhood commercial districts and mixed-use areas, which are often intended to serve local needs and foster walkability, community identity, and small-scale retail diversity. Therefore, impacts are considered slightly less adverse than the proposed Project, but would remain *less than significant*.

Transportation

Alternative 1 would concentrate cannabis storefront retail and delivery operations in predominantly higher intensity commercial and industrial zones, thereby removing them from more pedestrian-oriented and neighborhood commercial areas. By focusing cannabis businesses in industrial corridors, Alternative 1 generally places new trip-generating uses in areas with established transportation infrastructure designed for higher traffic volumes and commercial deliveries, thereby reducing the likelihood of congestion or circulation conflicts in residential or mixed-use districts. This supports the integrity of multimodal transportation networks in sensitive areas and helps preserve walkability and transit access in neighborhood commercial or mixed-use zones. However, clustering cannabis businesses in select industrial areas could result in localized increases in vehicle trips, including customer, employee, and distribution traffic, potentially leading to congestion or parking demand in those districts. Excluding cannabis retail businesses from mixed-use and neighborhood commercial zones may also reduce accessibility for residents in those areas; potentially increasing VMT as customers and employees travel longer distances to reach licensed storefront retailers located in industrial corridors, or increasing the trip length for deliveries. Impacts to transportation under Alternative 1 would remain similar to those described for the proposed Project and would be considered *significant and unavoidable*, even with the application of MM TR-1.

Utilities and Service Systems

Under Alternative 1, all cannabis businesses would be required to occupy existing buildings in areas already served by municipal water, wastewater, solid waste, energy, and telecommunication infrastructure. These buildings are designed to accommodate utility demands similar to those of other commercial and industrial uses, and thus would not require the construction or expansion of new utility facilities. Seeing that Alternative 1 would not reduce the number of cannabis licenses and that all project components would be required to comply with existing regulations and the Title 8 and Title 22 amendments under this alternative, impacts are expected to similar to the proposed Project and would be *less than significant*.

4.6.3 Alternative 2 – Prohibit Volatile Manufacturing

Under Alternative 2, the County would prohibit volatile manufacturing businesses as an allowable commercial cannabis activity. All other program elements remain the same as the Project. This alternative would be feasible because the Board of Supervisors has approved 10 manufacturing licenses which could be allocated to only non-volatile manufacturers. As of September 2024, only 123 volatile manufacturing licenses are active in the state compared to 409 non-volatile licenses, suggesting it is not a popular license type. This would eliminate risk of fire and explosion, especially in Fire Hazard Severity Zones (FHSZs).

Potential Environmental Impacts

Alternative 2 would restrict opportunities for businesses specializing in products requiring volatile extraction. It would also reduce business diversification opportunities and the diversity of locally manufactured cannabis products. This alternative would adversely impact the county's industry competitiveness.

Air Quality

Alternative 2 would prohibit volatile manufacturing as an allowable activity, while permitting all other cannabis business types under the same regulatory framework as the proposed Project. Volatile manufacturing processes typically involve the use of solvents such as butane, propane, or hexane, which are classified as VOCs. These substances can contribute to the emission of hazardous air pollutants, including VOCs and potentially toxic air contaminants, during extraction, processing, and accidental releases. By prohibiting volatile manufacturing, Alternative 2 would directly eliminate a source of VOC emissions and associated air quality risks from the cannabis sector in the unincorporated areas of Los Angeles County.

Emissions from cannabis businesses are predominantly attributed to mobile source vehicle trips and facility maintenance, but manufacturing activities, especially those involving volatile solvents, can be a notable source of criteria pollutants and ozone precursors. By restricting manufacturing to non-volatile processes (e.g., carbon dioxide [CO_2] or ethanol

extraction), Alternative 2 ensures that air emissions from cannabis manufacturing remain within the lower-risk category, subject to existing regulatory controls and Air Quality Management Plans (AQMPs). Therefore, impacts are expected to be similar to the proposed Project and would remain *less than significant*.

Energy

Under Alternative 2, the County would prohibit volatile manufacturing as an allowable activity, while permitting all other cannabis business types under the same regulatory framework as the proposed Project. Volatile manufacturing processes typically require specialized equipment for solvent extraction, such as closed-loop systems, which can be energy-intensive due to the need for precise temperature control, ventilation, and safety systems. By eliminating volatile manufacturing, Alternative 2 would remove these high-energy-use operations from the program, thereby reducing the cumulative electricity and possibly natural gas consumption associated with cannabis manufacturing in the unincorporated areas of Los Angeles County. Non-volatile manufacturing (e.g., CO_2 or ethanol extraction) generally requires less energy than volatile processes, and the remaining cannabis business types—cultivation, retail, testing, and distribution—would continue to operate within existing buildings and be subject to County and State energy efficiency standards. By restricting manufacturing to non-volatile methods, Alternative 2 ensures that energy consumption for cannabis manufacturing remains within a lower range, supporting consistency with local and state energy efficiency goals and renewable energy requirements. Therefore, impacts are expected to be slightly less than the proposed Project, but would remain *less than significant*.

Greenhouse Gas (GHG) Emissions

By eliminating volatile manufacturing, Alternative 2 would remove a source of both direct and indirect GHG emissions from the cannabis sector in Los Angeles County. A typical manufacturing facility is estimated to generate about 10.84 metric tons (MT) of CO_2 equivalent (CO_2e) annually, compared to 51.59 MT CO_2e for retail and 16.73 MT CO_2e for testing. Removing volatile manufacturing would reduce the cumulative GHG emissions from the cannabis sector, helping the County remain consistent with local and state reduction targets such as those outlined in the 2045 Los Angeles County Climate Action Plan and the California Air Resources Board's (CARB's) Scoping Plan. Under this alternative, all remaining cannabis business types would continue to be subject to robust regulatory requirements, including energy efficiency standards, renewable energy mandates, and operational controls designed to minimize GHG emissions. The overall contribution of cannabis businesses to countywide GHG emissions would remain negligible compared to the total emissions inventory for unincorporated Los Angeles County. Therefore, Alternative 2 would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and impacts would be similar to the proposed Project and be *less than significant*.

Hazards and Hazardous Materials

Alternative 2 would prohibit volatile manufacturing as an allowable activity, while permitting all other cannabis business types under the same regulatory framework as the proposed Project. Volatile manufacturing processes in the cannabis industry typically involve the use of flammable and explosive solvents such as butane or propane to produce Tetrahydrocannabinol (THC) extracts (e.g., butane hash oil). By eliminating volatile manufacturing, Alternative 2 would directly remove the most hazardous cannabis-related activity from the program, thereby reducing the potential for significant upset or accident conditions involving hazardous materials used in these volatile extraction processes. Under this alternative, all cannabis businesses, regardless of type, would be subject to stringent federal, state, and local regulations—including the California Hazardous Waste Control Act, California Fire Code, and requirements for Hazardous Materials Business Plans (HMBPs) under California Code of Regulations (CCR) Title 19. These regulations govern the safe use, storage, transport, and disposal of hazardous materials, and require emergency response planning and regular inspections.

Further, the location of cannabis businesses would continue to be limited to eligible industrial, commercial, commercial-only mixed-use, and institutional zones, with buffers from sensitive uses such as schools and youth-oriented facilities. This spatial separation, combined with the removal of volatile manufacturing, further reduces the likelihood of hazardous materials incidents affecting the public or environment. Therefore, impacts are expected to be slightly less than the proposed Project, but would remain *less than significant*.

Land Use and Planning

Similar to the proposed Project, Alternative 2 would only permit commercial cannabis businesses in existing, legally established buildings within eligible commercial, industrial, institutional, and commercial-only mixed-use zones, and would be subject to site plan review to ensure compliance with all relevant land use policies and development standards. By prohibiting volatile manufacturing, Alternative 2 would further reduce the potential for land use conflicts, particularly in industrial zones where such activities could otherwise introduce higher-risk operations (e.g., those involving flammable solvents) near other employment-based or sensitive uses. Prohibiting volatile manufacturing would also reinforce the County's goals of minimizing incompatible land uses and protecting sensitive receptors, as outlined in General Plan Policies LU 7.1 and LU 7.2. Alternative 2 would also maintain consistency with the County's policies to encourage infill development, adaptive reuse, and revitalization of underutilized sites (Policies LU 4.1 and LU 4.2), since all cannabis businesses would still be limited to existing structures in urban and suburban areas. Therefore, impacts are expected to be slightly less adverse than the proposed Project, but would remain *less than significant*.

Transportation

Under Alternative 2, volatile manufacturing would be prohibited as an allowable activity, and other existing cannabis businesses would be limited to existing, permitted buildings within eligible industrial, commercial, commercial-only mixed-use zones, and institutional zones, all of which are served by established transportation networks. Volatile manufacturing, which typically involves specialized equipment and may require additional deliveries of hazardous materials (such as solvents), could generate a modest increase in truck trips for supply and waste removal compared to non-volatile manufacturing. By prohibiting volatile manufacturing, Alternative 2 would slightly reduce the potential for truck traffic associated with the transport of hazardous materials, but the overall effect on the circulation system—including roadways, transit, bicycle, and pedestrian facilities—would remain negligible.

Additionally, the proposed Project would not result in substantial new development, nor would it require changes to existing transportation infrastructure or introduce incompatible uses (e.g., large farm equipment) on public roadways under this alternative. Emergency access would remain adequate, as all cannabis businesses would be located in areas with existing public roadway infrastructure and would be subject to County Fire Code requirements for emergency vehicle access.

However, given that individual commercial cannabis businesses could still exceed the County's VMT screening criteria under Alternative 2, VMT impacts would remain similar to those described for the proposed Project and would be considered *significant and unavoidable*, even with the application of MM TR-1.

Utilities and Service Systems

Under Alternative 2, volatile manufacturing would be prohibited, while all other cannabis business types would remain subject to the same regulatory framework as the proposed Project. This approach would further reduce potential impacts on utilities and service systems, as volatile manufacturing is associated with hazardous waste streams and specialized utility demands. All remaining cannabis businesses would be located in existing buildings within urban and suburban areas already served by adequate water, wastewater, energy, and telecommunications infrastructure. Water and wastewater demands from these businesses, including indoor cultivation, would be within the capacity of municipal providers, and solid waste generated would be managed in accordance with state and local regulations, with sufficient landfill and recycling capacity available.

By eliminating volatile manufacturing, Alternative 2 would reduce the need for hazardous waste management and specialized utility upgrades, ensuring that cumulative impacts on local utility systems remain less than significant. All cannabis business types would continue to be subject to robust regulatory oversight, licensing limits, and spatial distribution requirements, supporting the County's goals for sustainable resource management and public health protection. Therefore, impacts are considered to be slightly less than the proposed Project, but would remain *less than significant*.

4.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines § 15126.6(E)(2) requires that an analysis of alternatives identify an Environmentally Superior Alternative among the alternatives evaluated in the EIR. In general, the Environmentally Superior Alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment.

Table 4-5 below compares the environmental impacts of the proposed Project and the alternatives considered for full analysis. Of the alternatives considered, the No Project Alternative eliminates the direct significant and unavoidable impacts identified for the proposed Project. However, the No Project Alternative would not achieve any of the Project Objectives. Further, without regulation and enforcement resources, the implementation of the No Project Alternative could result in indirect impacts associated with illicit and unregulated cannabis operations.

According to CEQA Guidelines § 15126.6(a), the purpose of an alternatives analyses is to identify alternative developments that would feasibly attain most of the basic objectives of the project but that would avoid or substantially reduce the significant effects of the proposed Project. As described in Section 4.6.2, *Alternative 1 – Reduce Retail and Deliverable Eligibility in Commercial and Mixed-Use Zones* and Section 4.6.3, *Alternative 2 – Prohibit Volatile Manufacturing*, Alternatives 1 and 2 would result in similar impacts to the proposed Project. The proposed Project offers the broadest access and business diversity, with robust regulatory controls. Alternative 1 narrows retail and delivery eligibility to higher-intensity commercial and industrial zones, prioritizing neighborhood compatibility but potentially limiting access and increasing clustering of cannabis businesses. Alternative 2 maintains broad zoning eligibility but eliminates volatile manufacturing, prioritizing safety and risk reduction at the expense of business diversity. While Alternatives 1 and 2 would reduce VMT impacts, neither of these alternatives would entirely eliminate the significant and unavoidable impacts, even with the implementation of MM TR-1. Therefore, the County has determined that the Environmentally Superior Alternative is the proposed Project, given the similar impacts across the alternatives, but the reduction in the ability of Alternatives 1 and 2 to accomplish the Project Objectives.

Table 4-5. Comparison of Project Alternatives

Environmental Topic	Proposed Project	No Project Alternative	Alternative 1 – Reduce Retail and Delivery Eligibility in Commercial and Mixed-Use Zones	Alternative 2 – Prohibit Volatile Manufacturing
Air Quality	Less than Significant	Potentially more adverse	Similar (Less than Significant)	Similar (Less than Significant)
Energy	Less than Significant	Potentially more adverse	Similar (Less than Significant)	Similar (Less than Significant)
Greenhouse Gas Emissions	Less than Significant	Potentially more adverse	Similar (Less than Significant)	Slightly less adverse (Less than Significant)
Hazards and Hazardous Materials	Less than Significant	Potentially more adverse	Similar (Less than Significant)	Slightly less adverse (Less than Significant)
Land Use and Planning	Less than Significant	Potentially more adverse	Slightly less adverse (Less than Significant)	Slightly less adverse (Less than Significant)
Transportation	Significant and Unavoidable	Similar	Slightly less adverse (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Utilities and Service Systems	Less than Significant	Potentially more adverse	Similar (Less than Significant)	Slightly less adverse (Less than Significant)
Meets Project Objectives	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent

5.0 OTHER CEQA CONSIDERATIONS

5.1 INTRODUCTION

This section presents the evaluation of additional topics that the California Environmental Quality Act (CEQA) requires which are not addressed in the other sections of this Program Environmental Impact Report (EIR) for the Commercial Cannabis Business Licensing Program (Project) in the County of Los Angeles (County). CEQA Guidelines § 15126 requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Accordingly, in addition to the analysis provided in Chapter 3, *Environmental Impact Analysis*, this Program EIR must identify growth-inducing impacts and significant irreversible environmental changes that would result from implementation of the proposed Project. Accordingly, other CEQA issues include significant unavoidable environmental effects of the proposed Project, significant irreversible environmental changes, growth-inducing impacts (including removal of obstacles to growth), and environmental topics that involved solely no impacts and/or impacts that would not to be significant.

5.2 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACTS

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

Based on the analysis presented in this Program EIR, the proposed Project would result in a significant and unavoidable impact related to vehicle miles traveled (VMT) as described in Section 3.6, *Transportation*. As discussed therein, the implementation of MM TR-1 would require mitigation of VMT impacts on a project-specific level, primarily for cannabis cultivation, non-volatile and volatile manufacturing, testing business types that generate VMT predominately from employee commuter trips. However, due the absence of project-specific details at this time, it cannot be determined that these mitigation measures alone would reduce impacts, particularly those from delivery, visitor, and inter-business transport trips, to a less than significant level. Furthermore, employer-based Transportation Demand Management (TDM) measures (e.g., rideshare, carpooling, etc.) may be difficult to implement and/or may not be effective in reducing trip generation to a level that is less than significant. No other mitigation measures are considered feasible to reduce VMT impacts of the Project.

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines § 15126.2(d) requires a discussion of the following:

> *Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

As described in Chapter 3, *Environmental Impact Analysis*, the proposed Project consists of the adoption of amendments to the Los Angeles County Code (LACC) to allow commercial cannabis businesses in certain zones in the unincorporated areas of the county. The proposed Project would not create direct environmental impacts; however, new commercial cannabis activities that would be permissible as a result of the proposed Project have the potential to create environmental impacts (indirect impacts) and, therefore, the environmental analysis focuses on the indirect impacts of the proposed Project.

As discussed in Chapter 2, *Project Description*, the proposed Project would authorize the County to issue a limited number of licenses to allow only certain commercial cannabis activities in specific zones and under certain conditions, while continuing to prohibit other commercial cannabis activities (e.g., outdoor cultivation and cannabis festivals). The Board of Supervisors would have the discretion to increase or decrease the number of licenses to allow, or reinstate a complete prohibition on, commercial cannabis activities, after initiating the proposed Project. Also, given that licenses would require annual renewal, the County could decide not to renew a license for a commercial cannabis activity if the County finds that the commercial cannabis business fails to comply with applicable regulations, is creating a public nuisance, etc. Therefore, in comparison to land uses that do not involve a licensing requirement, the County would have greater authority to disallow a commercial cannabis business and avoid the creation of irreversible environmental damage that could result from its establishment and/or operations.

Despite this discretionary power/authority, the proposed Project would result in the following irreversible changes to the environment – even if it is implemented for only a limited period of time:

- Consumption of Nonrenewable Energy Resources: Section 3.1, *Air Quality*, Section 3.2, *Energy*, and Section 3.3, *Greenhouse Gas Emissions*, set forth an analysis of the impacts regarding air quality, energy, and greenhouse gas (GHG) emissions, respectively. In order to assess these impacts, the analysis accounted for energy consumption that would occur as a result of the limited construction activities associated with the establishment of a commercial cannabis business on a property that has an existing building capable of facilitating the commercial cannabis business, as well as the operation of the

commercial cannabis businesses. As discussed in Section 3.1, *Air Quality* – although the commercial cannabis activities would be subject to State licensing energy conservation requirements and would rely at least to a certain degree on electricity from renewable energy resources – the proposed Project would involve the consumption of nonrenewable, fossil fuel-based energy resources during construction activities (e.g., renovations, remodels, and other activities) and operation of commercial cannabis businesses.

Specifically, construction worker trips and the transport/delivery of construction materials and equipment, as well as the use of construction equipment, would involve consumption of petroleum-based, nonrenewable energy resources. Also, it is likely that construction materials that would be used in the renovations, remodels, and other activities to establish commercial cannabis businesses would be derived from petroleum resources and/or would involve the use of petroleum resources during manufacturing processes and/or the transport/delivery of them. Similarly, employee, customer, supply delivery, maintenance, and utility/service (e.g., solid waste hauler) trips, use of production and/or maintenance equipment, and materials (e.g., plastic materials) used in testing, distribution, manufacturing, and retail sales, would involve the use of petroleum-based, nonrenewable resources. Finally, at least a portion of the electricity for the operation of commercial cannabis businesses would be sourced from power plants that use nonrenewable energy resources (e.g., natural gas or petroleum).

- Irreversible Damage: As discussed in Section 3.4, *Hazards and Hazardous Materials*, hazardous materials associated with cannabis businesses vary depending on the type (e.g., retail, manufacturing) and scale of operations; however, typical hazardous materials 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 use, handling, storage, and disposal of such materials and, consequently, has the potential for accidents (e.g., explosions and fires) that could result in irreversible damage to humans and the environment.

  While the proposed Project has the potential to result in accidents involving the use of hazardous materials which could harm humans and/or the environment, all commercial cannabis businesses would be subject to federal, state, and local regulations that reduce the likelihood and/or level of hazard. In addition, the proposed LACC Title 22 and Title 8 amendments provide further protection to the public and environment through buffers and licensing limitations, which would limit the potential risks from the proposed Project. Further, commercial cannabis businesses would be allowed only in commercial, industrial, institutional, and commercial-only mixed-use zones that are located in urban and suburban unincorporated areas of the county. Therefore, although accidents associated with the use of hazardous materials could occur within proximity to relatively large populations of people, commercial cannabis locations would be readily accessible

to emergency response providers and are unlikely to occur in areas that could irreversibly affect wildlands, open space, and waterbodies, or generate wildfires.

5.4 GROWTH-INDUCING IMPACTS

CEQA Guidelines § 15126.2(d) requires consideration of the potential for the proposed Project to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. This potential economic or population growth, or "growth-inducing impacts," are distinct from the direct economic, population, or housing growth of a project because it is an indirect result of implementation of a project that would not have taken place in the absence of the project and that exceeds planned growth. Growth inducement can be a result of new development that increases employment levels, removes barriers to development, or provides resources that lead to secondary growth. Some projects may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Induced growth in any area should not be assumed to be necessarily beneficial, detrimental, or of little significance to the environment. It should, however, be analyzed for an understanding of how it could potentially affect the surrounding environment.

As described elsewhere in this Program EIR, the proposed Project would involve the adoption of amendments to the LACC and, consequently, would not result in direct impacts on the environment. However, an albeit limited amount of new development associated with the establishment of commercial cannabis businesses in existing buildings (e.g., building remodels, renovations, and the installation of accessory structures) would indirectly result from the proposed Project. This limited development resulting from, and new uses established by, the proposed Project are unlikely to result in substantial growth inducement. Commercial cannabis uses only would be allowed in existing buildings on lots located within urban and suburban areas that already are served by existing public infrastructure and utilities (e.g., roads, water systems, and sewage disposal systems). Therefore, the proposed Project would not cause the construction of new or expanded public infrastructure and/or utilities that could facilitate additional growth.

The proposed Project also is unlikely to induce population growth or the construction of infrastructure and/or housing that would adversely affect the environment. As discussed in the Initial Study (IS) prepared for the proposed Project (see Appendix A), given the urban and suburban populations that exist in the areas in which commercial cannabis activities would be allowed, and the social equity component of the proposed Project that would prioritize the issuance of commercial cannabis business licenses to individuals that were adversely impacted by cannabis prohibition and may have a connection to the region, employees required for the construction activities and operation of commercial cannabis businesses would likely consist of those who already reside 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 either 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. Finally, commercial cannabis businesses would be prohibited in dwelling units and, therefore, would not remove the availability of existing housing stock which could create new demand for housing development that could adversely affect the environment.

5.5 SECONDARY IMPACTS

As stated in Section 5.4, *Growth-Inducing Impacts*, the environmental impacts associated with the proposed Project consist entirely of indirect, or secondary, impacts that could result from commercial cannabis businesses that the amendments to the LACC would allow. In addition, the proposed Project could result in secondary effects associated with operation of unregulated/unpermitted cannabis businesses in the County, which may be unable to obtain the permits and other entitlements necessary to legally operate. These operations tend to occur in remote areas that are challenging for law enforcement and emergency response services to access, exhibit important environmental resources associated with wildlands and open space areas, and are subject to significant hazards (e.g., wildfires and erosion, landslides, and debris flows from unsuitable development on steep slopes). However, the incentives for operating illegal commercial cannabis businesses would be at least partially offset by the potential to participate in the legal market – especially given the opportunities that the social equity program would create for those who have participated in illegal operations in the past. Additionally, the commercial cannabis business licensing program would enhance regulation of the commercial cannabis industry through the business license renewal requirements, license compliance monitoring, and Measure C tax revenue that could fund cannabis enforcement activities.

5.6 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines § 15128 requires a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and, therefore, are not discussed in detail in the EIR.

As previously described, the County prepared an IS to identify potentially significant impacts of the proposed Project warranting further evaluation in this Program EIR. CEQA Guidelines § 15063(c) states (in pertinent part) that one of the purposes of an IS is to assist in the preparation of an EIR by:

- Focusing the EIR on the effects determined to be significant
- Identifying the effects determined not to be significant
- Explaining the reasons for determining that potentially significant effects would not be significant

Appendix A includes the IS that the County had prepared for the proposed Project. As described further in the IS, the proposed Project: (1) was found to have potentially significant impacts that have been evaluated in Chapter 3, *Environmental Impact Analysis*; and (2)

would not result in impacts and/or would result in insignificant impacts involving the following environmental topics and, consequently, were not evaluated in this Program EIR:

- Aesthetics
- Agriculture/Forestry
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hydrology/Water Quality
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Wildfire

The IS includes: a description of the existing setting for each environmental topic; the threshold questions used to determine whether the proposed Project would have a significant impact regarding each environmental topic; and an analysis of the direct and indirect impacts associated with the proposed Project and the contribution of the proposed Project to cumulative impacts for each environmental topic.

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APPENDIX A

Notice of Preparation (NOP) and Initial Study (IS)

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NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT

NOTICE OF PUBLIC SCOPING MEETING

Date: March 5, 2025

TO: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations, Interested Parties

SUBJECT: Notice of Preparation of a Draft Program Environmental Impact Report and Public Scoping Meeting

The County of Los Angeles (County), as Lead Agency pursuant to the California Environmental Quality Act (CEQA), will prepare a Draft Program Environmental Impact Report (PEIR) for the proposed Los Angeles County Commercial Cannabis Business Licensing Program (Project). The County has prepared this Notice of Preparation (NOP) to provide agencies, organizations, and other interested parties with sufficient information describing the proposed Project and its potential environmental effects to enable meaningful response to this NOP.

All interested parties, including the public, responsible agencies, and trustee agencies, are invited to provide comments and input on the scope and content of the environmental information contained in the Draft PEIR. Trustee and responsible agencies should provide comments and input related to the agencies' respective areas of statutory responsibilities in connection with the proposed Project. As a responsible or trustee agency, your agency may need to use the PEIR prepared by the County when considering any permits that your agency must issue, or other approval for the proposed Project.

PROJECT NAME: Commercial Cannabis Business Licensing Program

PROJECT NO./CASE NO.: PRJ2024-000811 / RPPL2024001191

PROJECT APPLICANT: Los Angeles County

PROJECT DESCRIPTION/LOCATION: On February 15, 2022, the Los Angeles County Board of Supervisors directed relevant County departments to move forward with the development and implementation of Commercial Cannabis Business Licensing Program for unincorporated Los Angeles County. In accordance with this directive, the County of Los Angeles is proposing amendments to Title 22 (Zoning Ordinance Amendments) and Title 8 (Commercial Cannabis Administration Amendments) to allow for the permitting of legal commercial cannabis uses in eligible zone districts in unincorporated areas of Los Angeles County.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT: As described further in the Initial Study (IS) prepared for the proposed Project, the implementation of the Commercial Cannabis Business Licensing Program could result in potentially significant impacts to the following resource areas:

- Air Quality
- Energy
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Land Use/Planning
- Transportation
- Utilities/Service Systems

NOTICE OF VIRTUAL PUBLIC SCOPING MEETING: A virtual Public Scoping Meeting will be held on March 19, 2025 at 6:00pm to describe the proposed Project and the environmental review process, and to receive public comment on the scope and content of the PEIR. Participants may join at https://zoom.us/meeting/register/dF_oSdqbTsaUGknrIbJ5ew.

REVIEW PERIOD: The review period for this NOP is from March 5, 2025 to April 4, 2025. The NOP is available for public review on OCM's website: dcba.lacounty.gov/cannabis/publiccomment and at County of Los Angeles Department of Consumer and Business Affairs 320 W. Temple St. Room G-10. Los Angeles, CA 90012, Monday through Friday, 8:00AM to 4:30 PM, as well as the following locations:

Rowland Heights Library
1850 Nogales St.
Rowland Heights, 91748

Lennox Library
4359 Lennox Blvd.
Lennox, 90304

A C Bilbrew Library
150 E El Segundo Blvd.
Los Angeles, 90061

South Whittier Library
11543 Colima Rd.
Whittier, CA 90604

South Whittier Community Resource Center
10750 Laurel Ave.
South Whittier, CA 90605

Acton Agua Dulce Library
33792 Crown Valley Rd.
Acton, 93510

Topanga Library
122 N Topanga Cyn Blvd.
Topanga, 90290

East Los Angeles Library
4837 E 3rd St.
Los Angeles, 90022

La Crescenta Library
2809 Foothill Blvd.
La Crescenta, CA 91214

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but not later than April 4, 2025 and can be sent via e-mail: CannabisEIR@dcba.lacounty.gov or via mail: County of Los Angeles Department of Consumer and Business Affairs, Office of Cannabis Management, 320 W. Temple Street, Room G-10, Los Angeles, CA 90012. Written comments on the NOP will be accepted by the County March 5, 2025 through April 4, 2025.

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	fnieto@dcba.lacounty.gov | (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.

Zoning/Community Standards District (if applicable)	Implementation of the proposed Project, if approved, would occur in unincorporated Los Angeles County in eligible zones.

Brief Description of Project:

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.

Surrounding Land Uses & Setting:

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.

Native American Consultation:

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1?

☐ Yes ☒ No

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

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.

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 § 21082.3I contains provisions specific to confidentiality.

Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreements):

Public Agency	*Approval Required*
N/A	N/A

Concurrent projects in the area:

Project/Case No.	*Description and Status*
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.

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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.

☐ Aesthetics	☒ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry	☒ Hazards & Hazardous Materials	☐ Recreation
☒ Air Quality	☐ Hydrology/Water Quality	☒ Transportation
☐ Biological Resources	☒ Land Use/Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☒ Utilities/Service Systems
☒ Energy	☐ Noise	☐ Wildfire
☐ Geology & Soils	☐ Population/Housing	☒ 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	Fernando G Nieto	3/4/25
Print Name (Project Planner)	Signature (Project Planner)	Date
Laura Magallanes	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.[1]
- 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.[2]
- 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.[3]
- 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.[4]

[1] February 7, 2017 Approved Motion. https://file.lacounty.gov/SDSInter/bos/supdocs/111354.pdf.

[2] Los Angeles County Municipal Code. 2024. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT8COPRBUWARE_DIV1PUHELI_CH8.04PUHELI_PT7COCAAC.

[3] July 13, 2021 Approved Motion. https://file.lacounty.gov/SDSInter/bos/supdocs/159887.pdf.

[4] 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.[5]

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).

[5] 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 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.



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.

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_2), 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_2 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://tinyl.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	Yes
Testing	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 3rd 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?	☐	☐	☒	☐
b. Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?	☐	☐	☒	☐
c. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☒	☐
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)	☐	☐	☒	☐
e. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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
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. Would the project:				
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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?	☐	☐	☐	☒
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])?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

	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?	☐	☐	☐	☒

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)?	☒	☐	☐	☐
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?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

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_3), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$).[6] Additionally, the county is designated as being in non-attainment of State air quality standards for O_3 and particulate matter less than 10 microns in diameter (PM_{10}). 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, $PM_{2.5}$, and PM_{10}, for which

[6] 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.[7] 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.

[7] 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%20exposure%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)?	☐	☐	☐	☒
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?	☐	☐	☐	☒

	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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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.)?	☐	☐	☐	☒
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)?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	☐	☐	☐	☒
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

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.[8] 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.

[8] 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?	☒	☐	☐	☐
b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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

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.[9] 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

[9] 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.[10] 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

[10] Los Angeles Earthquake Report. 2024 https://earthquakelist.org/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?	☒	☐	☐	☐
b. Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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	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?	☒	☐	☐	☐
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?	☐	☐	☒	☐
f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☒	☐
ii) within an area with inadequate water and pressure to meet fire flow standards?	☐	☐	☐	☒
iii) within proximity to land uses that have the potential for dangerous fire hazard?	☐	☐	☒	☐
h. Does the proposed use constitute a potentially dangerous fire hazard?	☐	☐	☒	☐

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).[11] 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

[11] 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?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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?	☐	☐	☒	☐
ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
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?	☐	☐	☒	☐

	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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e. Conflict with the Los Angeles County Low Impact Development Ordinance (LACC, Title 12, Ch. 12.84)?	☐	☐	☐	☒
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)?	☐	☐	☒	☐
g. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
h. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

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

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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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.[12] 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,

[12] 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?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
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?	☐	☐	☒	☐

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.[13] 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?

[13] LACC Chapter 12.08 Noise Control. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO.

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

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?	☐	☐	☒	☐
b. Sheriff protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Libraries?	☐	☐	☒	☐
f. Other public facilities?	☐	☐	☒	☐

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?	☐	☐	☐	☒

	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?	☐	☐	☐	☒
c. Would the project interfere with regional trail connectivity?	☐	☐	☐	☒

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?	☒	☐	☐	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☒	☐	☐	☐
c. Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

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)?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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

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

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?	☐	☐	☒	☐
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	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?	☒	☐	☐	☐

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.

APPENDIX B

Scoping Summary

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1.0 INTRODUCTION

The County of Los Angeles (County), Department of Consumer and Business Affairs, Office of Cannabis Management (OCM) published a Notice of Preparation (NOP) for the proposed Los Angeles County Commercial Cannabis Business Licensing Program (Project) on March 5, 2025, announcing the intent to prepare this Program Environmental Impact Report (EIR) and solicit comments on the scope of the analysis to be provided in this Program EIR. (See Appendix A of this Program EIR.) The California Environmental Quality Act (CEQA) Guidelines require circulation of an NOP for a minimum 30-day review period. The public comment period included a virtual public meeting on March 19, 2025, and concluded on April 4, 2025.

2.0 SCOPING MEETING SUMMARY

Public Scoping Virtual Meeting: March 19, 2025, 6:00 PM to 7:30 PM

Mr. Fernando Nieto, County OCM, Program Chief, provided a welcome to the virtual scoping meeting and an introduction to the purpose ad requirements of the Project. Mr. Nick Meisinger, WSP USA Inc., EIR Consultant, provided an overview of the purpose and requirements of this Program EIR, including a discussion of key environmental topics to be addressed in this Program EIR. Immediately following the presentation, the County received public comments on the Project and this Program EIR. Table B-1 below provides a summary of the verbal public comments provided at the virtual scoping meeting.

The copy of the PowerPoint presentation and a complete audio/visual recording of the scoping meeting can be found at: https://dcba.lacounty.gov/cannabis/publiccomment/.

Table B-1. Scoping Meeting Comment Summary

Commenter	Comment Summary/Notes
Carmen Sainz, of Los Angeles, Department of Regional Planning	Gets a lot of comments regarding cannabis and zoning. In our service area, we have many Specific Plans with different zoning classifications. Was the intent to select equivalent commercial zones for where cannabis would be eligible within certain Specific Plans?
Mary Smith	A lot of work was completed over the past two years clarifying commercial zones. Stated to many communities in North County that rural commercial zones would not be considered eligible. It has been indicated in the Initial Study that there is no risk of wildfire, despite consideration of volatile manufacturing within high fire hazard zones. Should either eliminate the license or consider not allowing them in high fire hazard zones. The County fails to implement/enforce its own ordinances. If any mitigation is included that relates back to enforcement, the mitigation measures need to be crafted to find alternative solutions or be much stronger/feasible. OCM was told to provide buffers around specific sensitive uses, but there is an inconsistency with the Los Angeles County Code (LACC), as the LACC

	defines residential uses as sensitive. If you don't have any buffers between industrial and residential zones, the Program would not be consistent with the LACC and General Plan. The Initial Study states that the Project will have a less than significant impact regarding public services, but many folks have expressed concern about public safety. Licensing of cannabis businesses will cause more public safety concerns because those licensed operators will be able to do a lot more and get away with doing a lot worse. There are concerns about the impact of wildfire in areas with low water supplies. The County needs to look at the cumulative impacts from traffic, water resources, fire resources, and public safety.
Raneika Brooks, Principal Planner, City of Malibu	Asked if there are any maps in the document that the public can review. Believes many unincorporated areas near Malibu are designated high fire hazard zones. Opposes manufacturing and commercial uses in those areas.
Kenneth Shelton	Concerned about waste of cannabis materials and how that waste will be handled/disposed. Is all the waste being directed towards the landfills?
Sergio Franco	For the areas that border the City of Los Angeles that already have licenses, would those locations affect the unincorporated area/eligibility based on the concentrations/buffers?
Angela Sherick-Bright	Asks how the County will mitigate for increased traffic. The Westside Area Plan was just completed, which included up-zoning. Since the County identified all commercial areas for cannabis, how will the County mitigate the impacts of increased traffic and pollution?
Alma Romero	Would like to know if there will be a follow-up meeting for everyone on the Zoom call to provide answers to some of the questions asked. Asks who is going to enforce the regulations outlined in the presentation. States that live in an area where a storefront has popped up illegally, and asks how the County will be dealing with issues of illegal businesses. Expressed concerns about public safety and welfare. Asks if the County knows what the carbon footprint associated with storefronts will be.
Matthew Vo	This meeting shows us there are a lot of environmental concerns. Doesn't know if these concerns will cause the County to rethink the process/approval of the program if this Program EIR shows that there will be many negatives associated with the Project.
Mark Granger	Owns two industrial buildings that would be zoned for cannabis. Opposed to allowing cannabis within many of these communities, particularly those that have been adamantly opposed to allowing cannabis. States that the County does not have the resources to deal with these cannabis operations. Thinks that the CEQA study is inadequate.
Tracie Lyons	Conveyed that their community is a multi-jurisdictional community, which is impacted by so many different regulations from different jurisdictions. They also asked about how the County is taking these areas into consideration and dealing with the various regulations from different jurisdictions. Asked when the community will receive detailed answers to some of the comments and questions being raised.

Julian Garcia	Agrees with many of the comments raised. Interested to see what/how the Sheriff's Department deals with illegal operations. Excited for the program to get started so that County staff can focus on the licensed operators, which are less likely to cause the problems being raised by the communities and let the Sheriff's Department focus on everything else that is unlicensed/illegal.
Brandon Blue	Asks if there could be a raffle or other host endeavor award as incentive to get a storefront or cultivation license.
Randy Rodriguez, California Department of Fish and Wildlife	Stated appreciation for the County's effort to provide a regulated industry. The California Department of Fish and Wildlife plans to provide a detailed comment letter addressing biological resources, hydrology, and water quality.
Marilyn Crouch	Asked if the County will be looking at traffic patterns affecting their community, knowing that two large complexes are coming into their community.

3.0 INDEX TO SCOPING COMMENTS

Table B-2 lists all comments received on the NOP and at the Scoping Meeting and shows the comment set identification number for each letter or commenter. Table B-3 refers to each written comment and verbal comment received during the public scoping period for the Project and provides a response identifying the location (e.g., Subsection) where each comment is addressed in this Program EIR.

Table B-2. List of Scoping Comments

Individual / Agency / Affiliation	Format of Comment	Date Comment Received	Comment Set	Comment No.
Agencies and Organizations				
United Homeowners' Association II	Written Letter	November 15, 2024	1	1-6
Coalition for Prevention and Awareness in LA Metro (CoPALM)	Written Letter	April 1, 2025	7	1-13
California Department of Cannabis Control	Written Letter	April 2, 2025	8	1-4
California Department of Fish and Wildlife	Written Letter	April 4, 2025	11	1-10
Acton Town Council	Written Letter	April 4, 2025	12	1-7
Individuals				
Teri Malkin	Written Letter	March 12, 2025	2	1
Thurman Malik	Written Letter	March 12, 2025	3	1
Jesse Frierson	Written Letter	March 28, 2025	4	1
Carlos Montalvan	Written Letter	March 28, 2025	5	1
[No name]	Written Letter	March 31, 2025	6	1
Marilyn C.	Written Letter	April 3, 2025	9	1
Sandy Logan	Written Letter	April 3, 2025	10	1

Individual / Agency / Affiliation	Format of Comment	Date Comment Received	Comment Set	Comment No.
Cynthia LuVisi	Online Form	March 5, 2025	13	1
Lisa Maioli	Online Form	March 5, 2025	14	1
Teri Malkin	Online Form	March 18, 2025	15	1
LB	Online Form	March 18, 2025	16	1
Heidi J. Swan	Online Form	March 27, 2025	17	1
Scott Mayers	Online Form	March 28, 2025	18	1
Yoanna Acosta	Online Form	March 28, 2025	19	1
Dan Perez	Online Form	March 29, 2025	21	1
Sandra Tamayo	Online Form	March 31, 2025	21	1
Ruth Brock	Online Form	March 31, 2025	22	1
Miriel Bereal	Online Form	March 31, 2025	23	1
Gabriel Avilez	Online Form	March 31, 2025	24	1
Angela Sherick-Bright	Online Form	April 4, 2025	25	1
Matthew Vo	Online Form	April 4, 2025	26	1
Carmen Sainz	Verbal	March 19, 2025	27	1
Mary Smith	Verbal	March 19, 2025	28	1-2
Raneika Brooks	Verbal	March 19, 2025	29	1
Kenneth Shelton	Verbal	March 19, 2025	30	1
Sergio Franco	Verbal	March 19, 2025	31	1
Angela Sherick-Bright	Verbal	March 19, 2025	32	1
Alma Romero	Verbal	March 19, 2025	33	1
Matthew Vo	Verbal	March 19, 2025	34	1
Mark Granger	Verbal	March 19, 2025	35	1
Tracie Lyons	Verbal	March 19, 2025	36	1
Marilyn Crouch	Verbal	March 19, 2025	37	1
Julian Garcia	Verbal	March 19, 2025	38	1
Brandon Blue	Verbal	March 19, 2025	39	1
Randy Rodriguez	Verbal	March 19, 2025	40	1

Table B-3. Response to Scoping Comments

INTRO: Chapter 1, *Introduction*
PD: Chapter 2, *Project Description*
CI: Chapter 3 *Environmental Impact Analysis*
AQ: Section 3.1, *Air Quality*
EN: Section 3.2, *Energy*
GHG: Section 3.3, *Greenhouse Gas Emissions*
HAZ: Section 3.4, *Hazards and Hazardous Materials*
LU: Section 3.5, *Land Use and Planning*
TR: Section 3.6, *Transportation*
UT: Section 3.7, *Utilities / Service Systems*
ALT: Chapter 5, *Alternatives Analysis*

Comment No.	Topic	Response
Comments from United Homeowners' Association II		
1-1	LU	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Section 3.5, *Land Use Planning*, for a detailed discussion of potential impacts and mitigation measures associated with the Project's effects on land use planning and consistency with adopted plans and policies.
1-2	PD, LU	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 2, *Project Description,* for a detailed description of buffer zone requirements and areas of particular concern. Please refer to this Program EIR Section 3.5, *Land Use Planning*, for a discussion of potential impacts and mitigation measures associated with the Project's effects on neighborhood compatibility and quality of life.
1-3	PD	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
1-4	PD	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
1-5	PD	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
1-6	PD, LU	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 2, *Project Description,* for a detailed description of zoning eligibility requirements and conditions.
Comment from Teri Malkin		
2-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
Comment from Thurman Malik Robinson		
3-1		Thank you for your comments. For more information related to the Project, as well as how to contact OCM with questions about the Project, please visit the Project website at: https://dcba.lacounty.gov/cannabis/eir/.
Comment from Jesse Frierson		

4-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
Comment from Carlos Montalvan		
5-1	PD, LU	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 2, *Project Description,* for a detailed discussion of proposed buffer zone requirements and limits on eligibility of commercial/mixed-use-, industrial-, and institutional-zoned lands for commercial cannabis activities. Please refer to this Program EIR Section 3.5, *Land Use Planning*, for a discussion of potential impacts and mitigation measures associated with the Project's effects on neighborhood compatibility and land use planning.
Comment from [No Name]		
6-1	PD, LU	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 2, *Project Description,* for a detailed description of the proposed limits on eligibility of commercial/mixed-use-, industrial-, and institutional-zoned lands for commercial cannabis activities.
Comment from Jennifer Sernas [CoPALM]		
7-1	AQ, HAZ, LU, TR, PS	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Section 3.1, *Air Quality,* for a detailed discussion of potential impacts and mitigation measures associated with the Project's effects on air quality and odor impacts. Please refer to Section 3.4, *Hazards and Hazardous Materials*, for a detailed discussion of potential impacts and mitigation measures associated with the Project's effects from the use, handling, storage, and disposal of hazardous materials, as well as hazards associated with cannabis manufacturing processes. Refer to Section 3.5, *Land Use Planning*, for a detailed discussion of potential impacts and mitigation measures associated with the Project's consistency with land use planning regulations. Finally, refer to Section 3.6, *Transportation,* for a detailed discussion of potential impacts and mitigation measures associated with the Project's effects regarding vehicle trips and vehicle miles traveled. The potential impacts of the Project related to law enforcement was analyzed in the Initial Study in Section XV, *Public Services*. As discussed therein, impacts regarding law enforcement would be *less than significant* and, therefore, not require further analysis in this Program EIR. Specifically, the discussion in the Initial Study states that the 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. Additionally, medical and non-medical cannabis businesses or activities (except for personal use of cannabis) are currently 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 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 resulting from the 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.
Comments from Kevin Ponce [California Department of Cannabis Control]		
8-1	PD	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
8-2		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 3, *Environmental Impact Analysis,* for discussion of the organization and approach to the environmental impact analysis within this Program EIR. Please also refer to the topical sections included in Chapter 3 (Sections 3.1 through 3.7) for discussion of potential Project impacts and mitigation measures associated with each topic.
8-3		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
8-4	CI	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 3, *Environmental Impact Analysis*, Subsection 3.1.4, *Cumulative Impact Analyses*, for a detailed discussion of methodology for analysis of the Project's cumulative environmental impacts. Additionally, please refer to the Cumulative Impacts subsection of each resource impact section found in this Program EIR Chapter 3 (Sections 3.1 through 3.7) for detailed discussions of cumulative impacts associated with each resource topic.
Comment from Marilyn C.		
9-1	PD, LU, PS	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 2, *Project Description,* for a detailed discussion of proposed buffer zone requirements and limits on eligibility of commercial/mixed-use-, industrial-, and institutional-zoned lands for commercial cannabis activities.

		Please refer to this Program EIR Section 3.5, *Land Use Planning*, for a discussion of potential impacts and mitigation measures associated with the Project's effects on neighborhood compatibility and land use planning. As stated in the response to comment 7-1 (above), the potential impacts of the Project related to law enforcement were analyzed in the Initial Study in Section XV, *Public Services*, would be *less than significant,* and, therefore, would not require further analysis in this Program EIR. See the response to comment 7-1 for additional information.
Comment from Sandy Logan		
10-1	AQ, GHG, HAZ	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Sections 3.1, *Air Quality*, 3.3, *Greenhouse Gas Emissions*, and 3.4, *Hazards and Hazardous Materials* for a detailed discussion of potential impacts and mitigation measures associated with the Project's effects regarding air, GHG emissions, and hazardous materials.
Comments from California Department of Fish and Wildlife		
11-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
11-2	CI	Please refer to this Program EIR Chapter 3, *Environmental Impact Analysis*, Subsection 3.1.4, *Cumulative Impact Analyses*, for a detailed discussion of the methodology for analyzing the Project's cumulative environmental impacts. Additionally, please refer to the Cumulative Impacts subsection of each resource impact section found in this Program EIR Chapter 3 (Sections 3.1 through 3.7) for detailed discussions of cumulative impacts associated with each resource topic. The potential impacts of the Project related to fish and wildlife resources is analyzed in the Initial Study in Section IV, *Biological Resources*. As discussed therein, the Project would not result in any impacts to biological resources. Specifically, as stated in the Initial Study, commercial cannabis activities would not be permissible within proximity to habitat or natural communities supporting sensitive species identified in a local or regional plan, policies, or regulations (e.g., regulations the California Department of Fish and Wildlife and/or United States Fish and Wildlife Service enforces). Commercial cannabis activities would be limited to existing, permitted buildings 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 in developed urban settings. In addition, any site alterations occurring as an indirect result of the 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 a Significant Ecological Area, as well as on public lands.
11-3		As mentioned previously, the analysis of potential impacts related to fish and wildlife resources is discussed in Section IV, *Biological Resources*, of the Initial Study. Please refer to the response to comment 11-2. With regard to the proposed buffer zone requirements and limits on eligibility of commercial, industrial, and institutional-zoned lands for commercial cannabis activities, please refer to the discussion provided in this Program EIR Chapter 2, *Project Description.* The Project would allow commercial cannabis activities only in existing, permitted buildings. Although certain undeveloped properties are located within the zones that are eligible for commercial cannabis activities and might comply with other locational requirements (e.g., location outside of any buffer area) of the Project, they would not be eligible for commercial cannabis activities because they do not have an existing, permitted building in which commercial cannabis activities could be conducted. Therefore, the Project does not have the potential to adversely affect biological resources that might exist on undeveloped properties that meet some—but not all—of the requirements for commercial cannabis activities.
11-4		The potential hydrological and water quality impacts of the Project related to water bodies (e.g., streams, lakes, and creeks) were analyzed in the Initial Study in Section X, *Hydrology and Water Quality*. As discussed therein, impacts to water resources would be *less than significant,* and, therefore, would not require further analysis in this Program EIR. Specifically, the discussion in the Initial Study states that the Project would not allow for development that directly involves construction of any new structures or uses that would produce substantial new wastewater or stormwater runoff. 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 resulting from the Project would be required to comply with: (1) the National Pollutant Discharge Elimination System (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). The Project does not expand the types of physical development that currently are permissible in the eligible zones. Any new development associated with a commercial cannabis business would be subject to existing LACC zoning regulations and General Plan policies and would have to occur prior to the issuance of a license for the commercial cannabis business. Compliance with existing regulations would ensure that a site that a future commercial cannabis business occupies resulting from the Project already would comply with applicable requirements regarding the management of 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. Additionally, the analysis of potential impacts related to aquatic habitats (e.g., streams, lakes, creeks) is discussed in the Initial Study in Section IV, *Biological Resources*. As discussed therein and above, the Project would not involve development of land for the purposes of commercial cannabis use. Licensed cannabis businesses would occur entirely indoors, within constructed and permitted structures on commercial/mixed-use, industrial, and institutionally zoned land. The potential for physical alterations 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. 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 (i.e., fish passage). If the physical development is permitted pursuant to current, applicable LACC and General Plan requirements, and existing at the time that the County considers issuance of the needed business license(s), then a commercial cannabis business could occupy the site. Therefore, impacts on water crossings would be *less than significant* and this issue does not require further analysis in this Program EIR.
11-5		As stated in the response to comments above, the analysis of potential impacts related to fish and wildlife resources is discussed in the Initial Study in Section IV, *Biological Resources*. Please refer to the response to comment 11-2 above. Please also refer to this Program EIR Chapter 2, *Project Description,* for further discussion of proposed parcel eligibility for commercial cannabis activities and site development and business operations standards.
11-6		The potential impacts of the Project related to the use of well water/groundwater were analyzed in the Initial Study in Section X, *Hydrology and Water Quality*. As discussed therein, 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. Given the Project is unlikely to result in substantial new demand for groundwater supplies, the Project is also unlikely to result in associated impacts on water availability in streams or other surface water bodies. Therefore, impacts would be *less than significant* and are not required to be further analyzed in this Program EIR. However, analysis of the Project's impacts to public water systems is discussed in this Program EIR Chapter 3.7, *Utilities / Service Systems*.

11-7		As stated above, the analysis of potential impacts related to biological resources, including species regulated under the California Endangered Species Act, are discussed in the Initial Study in Section IV, *Biological Resources*. Please refer to the response to comment 11-2 above.
11-8		As stated above, the analysis of potential impacts related to biological resources are discussed in the Initial Study in Section IV, *Biological Resources*. Please refer to the response to comment 11-2 above.
11-9	PD, ALT	As stated above, the analysis of potential impacts related to biological resources are discussed in the Initial Study in Section IV, *Biological Resources*. Please refer to the response to comment 11-2 above. Also, please refer to this Program EIR Chapter 2, *Project Description,* and Chapter 4, *Alternatives Analysis*, for a detailed description of the Project and analysis of the range of feasible alternatives to the Project.
11-10		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
Comments from Acton Town Council		
12-1	PS	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. As stated in the response to comment 7-1 (above), the potential impacts of the Project related to law enforcement were analyzed in the Initial Study in Section XV, *Public Services.* Impacts were determined to be *less than significant,* and, therefore, would not require further analysis in this Program EIR. See the response to comment 7-1 for additional information. The Sheriff's Department, along with various other County departments, has been frequently involved with the development of the Project over the past several years and has and will continue to be involved through the CEQA process. Prior to the release of the Initial Study and the EIR, OCM provided draft copies to various County departments for review and comment. These included the Sheriff's Department, the Fire Department, the Public Words Department, the Sanitation District, the Public Health / Environmental Health Division, the Department of Parks and Recreation, and the Department of Regional Planning for review and comment.
12-2		Please refer to EIR Chapter 1, *Introduction,* and Chapter 2, *Project Description,* for a detailed discussion of the purpose of the Program EIR and legal authority under CEQA. As stated above and in EIR Chapter 2, *Project Description*, the Project would not expand the types of physical development that are currently permissible pursuant to the LACC regulations and General Plan policies. Commercial cannabis businesses would be required to occupy only existing constructed and permitted buildings that comply with the LACC regulations and General Plan policies. The ministerial Site Plan Review would enable County staff to confirm that the existing development that the commercial cannabis business would occupy was legally permitted. If it is found that the existing development was not legally permitted or otherwise does not comply with current regulations and policies, the commercial cannabis business would be unable to obtain a business license and occupy the site. Therefore, there is no possibility that a subsequent activity resulting from the Project could

		result in a significant environmental impact, thereby warranting a discretionary entitlement and environmental review pursuant to CEQA.
12-3		The potential impacts of the Project related to increased hazard(s) to the public or the environment were analyzed in the Initial Study in Section IX, *Hazards and Hazardous Materials*. As discussed therein, these activities are subject to various regulations including: all applicable Federal, State, and local policies related to the handling, use, storage, odor emissions, transport or disposal of hazardous materials or waste; LACC's Title 32 Fire Code regarding emergency access, evacuation, fire suppression, and Americans with Disabilities Act of 1990 (ADA) accessibility requirements; and inspections from the Los Angeles County Fire Department to ensure continued compliance with LACC Fire Code permits and requirements. Therefore, cannabis business located within mapped Very High Fire Hazard Severity Zones (VHFHSZ) would be subject to applicable LACC Fire Code and properly inspected to ensure the compliance of the proposed operation. Additionally, as stated in Chapter 2, *Project Description* of this Program EIR, commercial cannabis activities involving volatile manufacturing would only be allowed in industrial zones where the County currently permits other hazardous and/or more hazardous uses (e.g., laboratories, incinerators, fuel yards, welding shops, etc.). These zones include light manufacturing (M-1), restricted heavy manufacturing (M-1.5), and heaving manufacturing (M-2). As such, the Project is unlikely to result in increased risk for the public or the surrounding environment.
12-4	PD, LU	Please see Section 3.1, *Air Quality*, of this Program EIR for the analysis of impacts regarding potential air quality-related odor and health impacts to uses designated by the County and local Air Quality Management Districts as sensitive receptors (i.e., users of residences, schools, daycare centers, parks and playgrounds, or medical facilities) and Section 3.5, *Land Use Planning*, of this Program EIR for the analysis of potential impacts regarding the Project's effects on effects on neighborhood compatibility and land use planning. As stated in Chapter 2, *Project Description* of this Program EIR, and Section XIII, *Noise*, of the Initial Study, commercial cannabis businesses would be located in commercial/mixed-use, industrial, and institutional zones where existing ambient noise levels are compatible with the uses of the Project. In addition, the Project is unlikely to create new sources of noise that could create an audible increase in ambient noise levels. Cannabis activities only would be allowed within constructed and permitted structures that would attenuate noise as heard from outside the structures. Commercial cannabis businesses also would be required to comply with existing 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). As such, a commercial cannabis business could not operate in such a manner as to exceed the maximum acceptable noise levels of residences located within proximity to the business.
12-5	PD	Please see the response to comment 12-2 above.
12-6		This comment has been noted and will be forwarded to decision makers for their consideration. The Commercial Cannabis Eligible Areas Map available at the Project website at

		https://dcba.lacounty.gov/cannabis/eir/ is based upon the extent of zoning districts reported in public GIS data available from the Los Angeles County Department of Regional Planning. The data in this map is provided for informational purposes. The map is not intended to reflect or inform parcel-specific eligibility for cannabis business licensing based on existing use of the site or site conditions. This map does not entitle, permit, or otherwise allow legal cannabis businesses or activities and shall not be used to determine cannabis business license or permit eligibility of properties. Under the proposed Project, as described in the Program EIR Chapter 2, *Project Description*, eligibility of a parcel for commercial cannabis activities would be determined as part of the permit and licensing application process, based on strict site eligibility requirements and regulations.
12-7	PD	Please refer to this Program EIR Chapter 2, *Project Description*, for a detailed description of the licensing process, including details on microbusiness regulations, concentration limits that would be established per Supervisorial District, and buffers—all of which would avoid concentrations of commercial cannabis uses. For more information about the "Good Neighbor Policy & Corporate Social Responsibility" and how to contact OCM with questions or comments about the program, please visit the Project website at: https://dcba.lacounty.gov/cannabis/eir/. Finally, the analysis of environmental impacts in this Program EIR assumes that commercial cannabis businesses would comply with all applicable policies and regulations. Commercial cannabis business licenses would be valid for one year and would require renewal. If OCM discovers as part of the annual review of the license that the licensee did not comply with the terms of the license, OCM would have the ability to take enforcement actions up to and including non-renewal of the license.
Comment from Cynthia LuVisi		
13-1	AQ	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Section 3.1, *Air Quality*, for a detailed discussion of potential impacts and mitigation measures associated with the Project's effects regarding odors and air quality.
Comment from Lisa Maioli		
14-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
Comment from Teri Malkin		
15-1	PD, GHG	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 2, *Project Description*, for a detailed discussion of proposed buffer requirements and limits on eligibility of commercial/mixed-use-, industrial-, and institutional-zoned lands for commercial cannabis activities. Please refer to this Program EIR Section 3.1, *Air Quality*, for a detailed discussion of potential impacts and mitigation measures associated with the Project's effects regarding air quality.

		Please refer to this Program EIR Section 3.5, *Land Use Planning*, for a discussion of potential impacts and mitigation measures associated with the Project's effects on neighborhood compatibility and land use planning. Please refer to this Program EIR Section 3.6, *Transportation,* for a discussion of the potential impacts and mitigation measures associated with the Project's effects on transportation systems.
Comment from LB		
16-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 1, *Introduction,* and Chapter 2, *Project Description*, for a description of the background of the Project and considerations involved with the development of the ordinance amendments.
Comment from Heidi J. Swan		
17-1	GHG, UT	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Section 3.3, *Greenhouse Gas Emissions,* for the analysis of the impacts and mitigation measures associated with the Project's effects regarding GHG emissions and climate change. Please also refer to this Program EIR Section 3.7, *Utilities / Service Systems*, for the analysis of the impacts and mitigation measures regarding water use and demand.
Comment from Scott Mayers		
18-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
Comment from Yoanna Acosta		
19-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. For a description of the purpose and intent of the Program EIR, as well as the focus of the environmental analysis, please refer to this Program EIR Chapter 1, *Introduction,* and Chapter 3, *Environmental Impact Analysis.*
Comment from Dan Perez		
20-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
Comment from Sandra Tamayo		
21-1	PD, TR	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Section 3.6, *Transportation*, for a detailed discussion of potential impacts and mitigation measures regarding transportation systems.
Comment from Ruth Brock		
22-1	PD	Thank you for your comments. Please refer to this Program EIR Chapter 2, *Project Description*, for a detailed description of the proposed

		licensing process and proposed limits on eligibility of commercial/mixed-use-, industrial-, and institutional-zoned lands for commercial cannabis activities.
Comment from Miriel Bereal		
23-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
Comment from Gabriel Avilez		
24-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 2, *Project Description,* for a detailed description of licensing and zoning eligibility requirements.
Comment from Angela Sherick-Bright		
25-1	TR	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Section 3.6, *Transportation*, for a detailed discussion of potential impacts and mitigation measures regarding transportation systems, including traffic safety.
Comment from Matthew Vo		
26-1	TR	Thank you for your comments. Comments will be forwarded to decision makers for their consideration. Please refer to this Program EIR Section 3.6, *Transportation*, for a detailed discussion of potential impacts and mitigation measures regarding the Project's direct and cumulative effects on transportation systems.
Comment from Carmen Sainz		
27-1	PD	Thank you for your comments. Please refer to this Program EIR Chapter 2, *Project Description,* for a detailed discussion of proposed buffer zone requirements and limits on eligibility of commercial/mixed-use-, industrial-, and institutional-zoned lands for commercial cannabis activities.
Comments from Mary Smith		
27-1	PD, LU	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 2, *Project Description,* for a detailed description of proposed buffer zone requirements and limits on eligibility of commercial/mixed-use-, industrial-, and institutional-zoned lands for commercial cannabis activities. Please refer to this Program EIR Section 3.5, *Land Use Planning*, for a discussion of potential impacts and mitigation measures regarding neighborhood compatibility and land use planning.
27-2	PS, CI	The potential impacts of the Project related to public services were analyzed in the Initial Study in Section XV, *Public Services*. As discussed therein, impacts regarding public services would be *less than significant* and, therefore, not require further analysis in this Program EIR. Specifically, the discussion in the Initial Study explains that the 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. In addition, all commercial cannabis businesses resulting from the 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 which would reduce potential impacts to public safety. The potential impacts of the Project related to wildfire was analyzed in the Initial Study in Section XX, *Wildfire*. As discussed therein, impacts regarding wildfire would be *less than significant* and, therefore, not require further analysis in this Program EIR. All commercial cannabis businesses resulting from the 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 a mapped Fire Hazard Severity Zone is properly inspected, is subject to applicable permits, and involves implementation of relevant fire prevention techniques. Cannabis businesses also would need approval from Los Angeles County Fire Department'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 and set forth requirements for solvent use and safety in manufacturing processes. Please refer to this Program EIR Chapter 3, *Environmental Impact Analysis*, for a detailed discussion of potential impacts and mitigation measures associated with the Project's cumulative environmental impacts. Additionally, refer to the Cumulative Impact subsection of each resource impact section found in this Program EIR Chapter 3 for detailed discussions of cumulative impacts associated with each resource.
Comment from Raneika Brooks		
28-1	PD	Thank you for your comments. Please refer to this Program EIR Chapter 2, *Project Description,* for a detailed description of zoning eligibility requirements. For more information related to the Project, as well as a link to the online zoning eligibility map, please visit the Project website at: https://dcba.lacounty.gov/cannabis/eir/.
Comment from Kenneth Shelton		
29-1	HAZ, UT	Thank you for your comments. Please refer to this Program EIR Section 3.4, *Hazards and Hazardous Materials*, and Section 3.7, *Utilities / System Services*, for a detailed discussion of potential impacts and mitigation measures associated with the Project's effects on waste and waste disposal.
Comment from Sergio Franco		
30-1	PD	Thank you for your comments. Please refer to this Program EIR Chapter 2, *Project Description,* for a detailed discussion of proposed buffer zone requirements and limits on eligibility of commercial/mixed-use-,

		industrial-, and institutional-zoned lands for commercial cannabis activities.
Comment from Angela Sherick-Bright		
31-1	AQ, GHG, TR	Thank you for your comments. Please refer to this Program EIR Sections 3.1, *Air Quality*, 3.3, *Greenhouse Gas Emissions*, and 3.6, *Transportation* for a detailed discussion of potential impacts and mitigation measures regarding air quality, GHG emissions, and transportation systems.
Comment from Alma Romero		
32-1	PS	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. For more information related to the Project, including links to responses to Frequently Asked Questions, copies of draft ordinance language, copies of public outreach materials, and how to contact OCM with questions or comments about the program, please visit the Project website at: https://dcba.lacounty.gov/cannabis/eir/. For more information about public service impacts, such as issues with public safety, please refer to Section XV, *Public Services*, of the Initial Study.
Comment from Matthew Vo		
33-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
Comment from Mark Granger		
34-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
Comment from Tracie Lyons		
35-1	PD	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Chapter 2, *Project Description*, for a detailed description of how jurisdictional regulations are incorporated in the Ordinance. For more information related to the Project and how to contact OCM with questions or comments about the program, please visit the Project website at: https://dcba.lacounty.gov/cannabis/eir/. Please also refer to this Program EIR Section 3.5, *Land Use Planning*, for a detailed discussion of potential impacts and mitigation measures associated with the Project's effects on land use planning and consistency with adopted plans and policies.
Comment from Julian Garcia		
36-1	PS	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration.
Comment from Brandon Blue		
37-1		Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. For more information related to the Project and how to contact OCM with questions or comments about the program, please visit the Project website at: https://dcba.lacounty.gov/cannabis/eir/.

Comment from Randy Rodriguez		
38-1		Thank you for your comments. Also, see the responses to comment set 11 above.
Comment from Marilyn Crouch		
39-1	TR	Thank you for your comments. Comments that are unrelated to the environmental analysis will be forwarded to decision makers for their consideration. Please refer to this Program EIR Section 3.6, *Transportation*, for a detailed discussion of potential impacts and mitigation measures regarding transportation systems.

November 15, 2024

Los Angeles County Department of Consumer and Business Affairs
Office of Cannabis Management
320 West Temple Street, Room G-10
Los Angeles, California 90012

ATTN: Office of Cannabis Management

Public Comment: United Homeowners' Association II View Park-Windsor Hills and View Heights Response to Los Angeles County Office of Cannabis Management's Draft Ordinance for Retail Cannabis Permitting and Operations in Unincorporated Los Angeles County

Dear Office of Cannabis Management,

The United Homeowners' Association II (UHA) is pleased to submit comments on the Los Angeles County Office of Cannabis Management's draft consideration of new regulations that would allow commercial/retail cannabis businesses to operate within unincorporated areas of Los Angeles County. The UHA finds several points of disconnection between the draft cannabis ordinance (DCO) and the Los Angeles County Department of Regional Planning's Westside Area Plan (WSAP).

1-1

The UHA questions the fact that the DCO does not appear to have considered the County's WSAP, which was written by the Los Angeles County Regional Planning Department for unincorporated communities on the Westside of the County. The WSAP was recently approved by the Los Angeles County Planning Commission and is anticipated to be heard by the Board of Supervisors in January 2025. The WSAP plan states:

"The WSAP directly implements the General Plan's 2021-2029 Housing Element as it reinforces its policies and designates the proposed general distribution, location, and extent of land uses for housing at a range of densities to support housing for all income levels. The Southern California Association of Governments' 6th Regional Housing Needs Assessment (RHNA) allocation requires accommodating increased residential densities and additional housing affordability options in the Westside Planning Area, and therefore the WSAP rezones properties and incorporates applicable goals, policies, and strategies to address these RHNA goals. The identification of opportunity sites that could accommodate additional housing in the Land Use Element largely reflects the sites for rezoning identified in Appendix B of the Housing Element."

In an effort to meet RHNA goals, the County through the WSAP, proposes to upzone several areas in View Park-Windsor Hills and View Heights that are called Opportunity Sites, allowing for the development of additional housing. The sites proposed for upzoning are: 5-Slauson-Heatherdale from C2 to Mixed Use; 6-Slauson-Overhill from C2 to Mixed Use; 7-Slauson Corridor East from C2 to Mixed Use; and 9 Leimert Park Adjacent from C1 to Mixed Use.

1-1 cont.

In what seems to be in direct conflict with the rationale for the WSAP upzoning, the DCO identifies these same areas as eligible for the location of cannabis retail businesses. UHA has identified this conflict in the DCO as it states:

"A commercial cannabis business shall not be located 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."

The DCO also states that:

"Commercial cannabis businesses in Zone MU shall be limited to commercial-only development projects and be subject to the additional application requirements of Section 22.140.134.E.2."

UHA's interpretation of these DCO statements is that if cannabis retail shops are located in any of the opportunity site areas, one cannot also construct dwelling units on the same lot. If this interpretation is correct, the rationale for upzoning these properties to allow for additional housing development is certainly faulty, or identifying these sites as eligible for cannabis retail is faulty. Based on a reading of both the DCO and the WSAP, the proposed policies must be harmonized to ensure achievement of the stated goals. These proposals are impactful land-use plans that affect every residence and business within unincorporated Los Angeles County and must be implemented carefully, knowledgeably, and thoughtfully.

1-2

Our response speaks to the prospective location of retail cannabis businesses along the commercial corridors, in our primarily residential community, and the potential conflicts of that with the WSAP's upzoning and rezoning proposals to enable the development of additional multifamily homes, in our community, along the same commercial corridors that the draft cannabis regulations point to. There are three commercial corridors within our community that are set forth below.

Critically important is that, as currently written, the draft cannabis regulations are completely silent as to the inclusion of churches/houses of worship in the proposed zoning locations for businesses. The stated buffer zones designated for Youth Oriented Uses don't mention churches/houses of worship, or a designated buffer zone for this category of protected sites. The draft regulations appear to be a legislative attempt to protect children from influence by, and exposure to, cannabis businesses within the Youth Oriented Uses' 600-foot buffer zone for such stated uses as "K-12 schools, daycares, parks, and libraries" but fails to go far enough to fully protect children. Common sense and thoughtful governance must acknowledge that children and young people not only attend services at churches/houses of worship but also after-school programs and church youth group meetings and activities, such as scouting, that are sited at churches/houses of worship on a daily basis. The UHA wholly supports the governmental mandate to protect its residents from any public nuisance and adverse impacts to health, safety, and well-being.

Along the Slauson corridor between Fairfax Avenue and Keniston Avenue, within the unincorporated boundaries or directly across the street from the boundary, and therefore within the Youth Oriented buffer zone of 600 feet, there are two daycare centers, eight private schools, a Kingdom Hall of Jehovah's Witness, nine churches, and one park (Ladera Park). The seven-block stretch of the 54th Street corridor, between Valley Ridge Avenue and Hillcrest Drive (within the boundaries of unincorporated Los Angeles County), there are a number of businesses that fall within the "Youth Oriented Use" rubric and those that should: Wayfinder Family Services (a social service agency serving children and young people), three schools (including an LAUSD elementary school), four churches and an LA County library, all within the View Park-Windsor Hills

1-2 cont.

community. This area is primarily a residential community of single-family homes and some multifamily residences along, and directly abutting, 54th Street and the other commercial corridors in this community.

Furthermore, the draft cannabis regulations resolve the issue of such retail business' location adjacent to, or within, any newly developed housing as contemplated in the WSAP. Title 22.140.134, Section G (6) expressly directs:

"A commercial cannabis business shall not be located within the same structure or on the same lots as any legally established dwelling unit…or any other structure permitted for residential occupancy."

The UHA would like this prohibition expanded to create a buffer zone of at least 600 feet from any multifamily or single-family dwelling. In the View Park-Windsor Hills and View Heights communities, there are many families with children and those children must be protected from any negative influences caused by the close proximity of retail cannabis businesses. This would be inappropriate, at least, and a decided public nuisance, at best, endangering the safety and well-being of children. Title 22.140.134, A (1) speaks to:

"minimizing the potential for adverse impacts on people, communities, and the environment."

The UHA's definition for "sensitive use areas" includes not only those discussed above but also alcohol and drug abuse recovery and treatment facilities (or rehabilitation facility). The UHA defines these facilities as "any non-medical alcoholism and drug abuse recovery or treatment facilities, licensed or certified by the State of California Department of Health Care Services, to provide residential non-medical services to individuals who are recovering from problems related to alcohol, drug, or alcohol and drug misuse or abuse, and who need alcohol, drug, or alcohol and drug recovery treatment or detoxification services." (City of Los Angeles, ordinance 187094). The UHA requests that a 1,000 foot buffer zone be established for retail or nonretail cannabis operations from a rehabilitation facility.

1-3

The UHA believes in the importance of alerting residents to renewing or new permits for cannabis operations. While the DCO speaks to notifications, the UHA requests that the community meeting notification section of the DCO be revised. The UHA requests that applicants, either renewing or applying for new permits, be required to host a meeting to notify residents, businesses, community organizations representing the area, schools, houses of worship, libraries, treatment facilities, and daycares within 1,000 feet of the facility with a minimum 10-day advanced notice.

1-4

The UHA also supports the Community Reinvestment plan for cannabis tax revenue, as set forth in the "Commercial Cannabis Business Permit Program, Summary of Proposed Regulations for Unincorporated Los Angeles County," and requests that the draft ordinance direct that a portion of the projected $9.7 million in tax revenue collected from all 90 operations permits be placed in a dedicated fund to be shared by the unincorporated communities in Los Angeles County where the retail cannabis businesses would reside.

The DCO states that 60% of Los Angeles County voters approved Measure C, enacting a tax on cannabis businesses operating in unincorporated areas of the County. It includes: 4% tax on retail, 3% tax on manufacturing and distribution, and $10/sq. ft. for cannabis cultivation businesses. The UHA requests that the Office of Cannabis Management provide a breakdown of how the taxes generated from these businesses will be allocated in the County's budget. These communities, in collaboration with the Office of Cannabis Management, should determine how the funding is distributed. Consequently, the UHA supports the DCO's

1-4 cont.

community reinvestment plan that could funnel "cannabis tax revenue to support key priorities and initiatives throughout the County."

1-5

The UHA requests that the DCO include a provision on the eligibility requirements for employment at cannabis retail businesses. The County should require that all employees of such businesses ***shall*** be at least 21 years of age and that the successful applicant's age be formally documented at the time of employment. This mandated age requirement is critical to better ensure a more mature workforce in the cannabis retail industry; and it is consistent with the age requirement under the City of Los Angeles retail cannabis program regulations.

1-6

Finally, the UHA has found that several sections of the West Carson TOD Specific Plan, as described below, are designated as prohibited Cannabis, Storefront Retail, but are permitted for Cannabis, Non-storefront Retail. UHA would like to know the rationale and criteria for the designation of these sites, as prohibited or permitted. If areas within View Park-Windsor Hills and View Heights that are eligible for cannabis operations meet the rationale or criteria for prohibiting Cannabis, Storefront Retail and/or the permitting of Cannabis, Non-storefront Retail, the UHA would like to explore with the Office of Cannabis Management granting these communities these designations. The law states:

SECTION X. Section 3.4.5 in Section 22.414.014 (West Carson TOD Specific Plan) is hereby amended to read as follows: 3.4.5 Neighborhood Commercial (NC) 3.4.5.2 Use Regulations: NC Zone The land use regulations define permitted, conditionally permitted, and prohibited uses within the NC Zone.

SECTION X. Section 3.4.7 in Section 22.414.014 (West Carson TOD Specific Plan) is hereby amended to read as follows: 3.4.7 Industrial Flex (IF) 3.4.7.2 Use Regulations: IF Zone The land use regulations define permitted, conditionally permitted, and prohibited uses in the Industrial Flex zone.

SECTION X. Section 3.4.9 in Section 22.414.014 (West Carson TOD Specific Plan) is hereby amended to read as follows: 3.4.9 Mixed Use 1 (MU1) Zone The land use regulations define permitted, conditionally permitted, and prohibited uses in the Mixed Use 1 Zone.

SECTION X. Section 3.4.10 in Section 22.414.014 (West Carson TOD Specific Plan) is hereby amended to read as follows: 3.4.10 Mixed Use 2 (MU2) Zone 3.4.10.2 Use Regulations: MU2 Zone The land use regulations define permitted uses within the Mixed Use 2 zone.

SECTION X. Section 22.416.080 is hereby amended to read as follows: 22.416.080 CSLA Neighborhood Commercial (CSLA NC) Zone ... B. Use Regulations for CSLA NC Zone. The land use regulations for the Neighborhood Business (C-2) Zone contained in Chapter 22.20 (Commercial Zones) shall apply to all development in the CSLA NC Zone, unless otherwise specified in this Subsection B. 1. Principal Uses. Table 22.416.080-A, below, identifies the principal uses that are generally permitted, conditionally permitted, or prohibited in the CSLA NC Zone.

In conclusion, we find the draft cannabis regulations to be vague and without consideration of how they can or should be implemented vis-á-vis the Westside Area Plan. Working with the Department of Regional Planning is essential for the Office of Cannabis Management' s efficient drafting and implementation of the ordinance for the reasonable permitting and location of these businesses as they overlay the WSAP.

While the UHA fully appreciates the County's attempt to regulate the operations of retail cannabis businesses, writ large, in unincorporated communities of Los Angeles County, the draft ordinance falls short of being a meaningful, comprehensive and thoughtful guidepost for the operation of commercial cannabis businesses.

Thank you for the opportunity to present the views of the United Homeowners' Association II. We are pleased to work with the Office of Cannabis Management to further draft an ordinance that is consistent with our comments.

***

Sincerely,

Toni Mc Donald Tabor,
Board President
United Homeowners' Association II

From: The Malkin Family
To: DCBA CannabisEIR
Subject: Rowland Heights
Date: Wednesday, March 12, 2025 11:39:02 AM

2-1

CAUTION: External Email. Proceed Responsibly.

I am against having cannabis on the Gale/Walnut Dr near Nogales area if Rowland HTS and City of Industry. It is next to RUSD transportation center that parents visit for school bus passes and teacher training. Families also shop at 99 Ranch Center.

Teri Malkin
18021 Galatina St.
Rowland HTS, CA 91748

From: APPSMOBILETAX - REI - FixnFlip - Thurman Malik
To: DCBA CannabisEIR
Cc: Grover Burnett II
Subject: Inquiry About Expedited Process for Established Cannabis Operators
Date: Wednesday, March 12, 2025 12:39:52 PM

CAUTION: External Email. Proceed Responsibly.

Subject: Inquiry About Expedited Process for Established Cannabis Operators

Greetings Los Angeles County Cannabis Initiative Team:

3-1

I am a silent investor partnering with my older cousin, who has successfully operated a dispensary in Oklahoma for over five years. After attending your recent meeting, we have several questions regarding your program for established operators. Our business is well-established—with proper liquidity, structure, and full documentation—and we are eager to expand.

Specifically, could you please advise us on:

• Whether there are groups or dedicated agencies for operators already in the business or looking to open multiple locations.

• Available funding opportunities, grants, or loans, including any resources connected with your initiative.

• Opportunities if we have land and are involved in cultivation, as well as facilities for storage, research, production, and manufacturing/processing.

• Available locations for expansion and whether you can provide a calendar of events or timeline outlining the rollout. We want to be on that list of new locations to open.

• The direct contact, agency or team we should connect with for advanced operators.

We are excited about the possibility of working with your team to further develop our business within the cannabis industry.

Also, what is the best direct number to contact you ? Do you have a person on your team who's name, number and email we can reach out to directly for further details and assistance?

Thank you for your time and assistance, and we look forward to your prompt response.

Hospitably yours,

Logo

Thurman Malik Robinson, M.S., Certified Life Coach, Investor & Author
Chief Financial Officer, ***Assertively Promoting Philanthropic Services APPS, LLC***
Intuit Quickbooks Brand Ambassador | #Tax #RealEstate #Health
@APPSMOBILETAX @RosettaRetailerGM | Owner | Online Store
@Master_KingMalik | Entrepreneur | thurmanrobin.webs.com
(323) 540-1855 (c) | (678) 310-8763 (d) | (770) 674-2240 (o)
appsefilepro@gmail.com | InfoRosettaRetailerGM@gmail.com
assertivelyapps.com | rosettaretailergm.com

From: Jesse Frierson
To: DCBA CannabisEIR
Subject: Request for Consideration Regarding Cannabis Retail License Eligibility
Date: Friday, March 28, 2025 10:17:48 AM

CAUTION: External Email. Proceed Responsibly.

Dear LA County Board of Supervisors ,

4-1

I am writing to formally request consideration regarding my eligibility for the upcoming Los Angeles County cannabis retail license launch. I understand that certain felony convictions may disqualify applicants from participating in this opportunity. However, I would like to provide context regarding my past conviction and highlight my rehabilitation, professional achievements, and commitment to compliance with state and local regulations.

In 1998, I was convicted of perjury due to obtaining a false identification card from the Department of Motor Vehicles. This was a youthful mistake made almost 30 years ago, with no victims or malicious intent beyond personal use for minor privileges such as staying out past curfew. Since then, I have had no further legal issues and have dedicated my life to personal and professional growth.

Over the years, I have earned a master's degree in criminal justice, along with other academic achievements. I have also worked for Los Angeles County for over a decade, demonstrating my commitment to public service and adherence to the law. Additionally, I currently own and operate a licensed cannabis retail business in the City of Los Angeles, which required me to pass extensive local and state background checks.

Recognizing my past mistake, I have taken every possible legal step to clear my record. My conviction was expunged, I have received a Certificate of Rehabilitation through the Superior Court, and I am currently awaiting a gubernatorial pardon. Given these efforts and my continued compliance with all applicable regulations, I respectfully request an opportunity for further review of the disqualifying felony list, and add a suggestion that the conviction background checks go back 20 years or so for non-violent

4-1 cont.

victimless crimes.

My goal in applying for this license is to contribute positively to the legal cannabis industry, create economic opportunities for my community, and build generational wealth for my family. I hope the OCM and LA County Board of Supervisors will take into account my long-standing record of rehabilitation, professional contributions, and the nonviolent, non-drug-related nature of my past conviction.

Thank you for your time and consideration. I would greatly appreciate the opportunity to discuss this matter further and provide any additional documentation needed to support my request. Please feel free to contact me at your convenience.

Sincerely,

Jesse Frierson

818-404-3915

Sent from my iPhone

From: Carlos Montalvan
To: DCBA CannabisEIR
Cc: ElCamino Village
Subject: Cannabis Public Comment Unincorporated El Camino Village
Date: Friday, March 28, 2025 9:14:03 AM

CAUTION: External Email. Proceed Responsibly.

Here are a few reasons we oppose cannabis in the Unincorporated LA County El Camino Village neighborhood:

5-1

- Our community is already targeted by illegal food vendors and it is known that LA County does not provide enforcement - we are a targeted community for crime and potentially organized crime: See local story: https://eccunion.com/warrior-life/2024/06/05/crenshaw-boulevard-and-marine-avenue-a-street-side-latin-american-food-court/
- We have two elementary schools, one middle school, and a community college located in our approx. one mile square area. We feel there should be no cannabis businesses of any time in this area.
- 33,000 students are registered at El Camino College each semester - we get lots of traffic from the students and do not need more traffic. And do not need students purchasing cannabis and walking through our family oriented neighborhoods smoking cannabis
- El Camino College is too close to the areas you have designated on your map as locations on Crenshaw Blvd and 154th to Marine Avenue.
- There is a drug rehab BHS facility in the area.
- There is a licensed daycare at 15126 Eriel Avenue, Gardena, CA
- We have a regional park in El Camino Village and we do not feel adding cannabis business anywhere near the park is advisable and creates a public safety issue
- Gardena who is on the east side of Crenshaw Blvd does not allow cannabis in their city
- We believe bringing the cannabis industry on any level (store front, test site, growing site, etc.) to be detrimental to our community and will cause public safety issues for our residents.
- We believe bringing in cannabis store fronts into our community would be a public safety issue as it has a high potential to bring in crime to our area.
- Currently LA County cannot enforce the illegal food vendor businesses in Unincorporated LA County El Camino Village and we do not believe they can enforce a cannabis industry.
- LA County continually tells us they do not have the resources to provide enforcement. They continually tell us they must be escorted by the Sheriff in order to make any site visit. Due to the potential of criminal activity with the cannabis industry, we strongly feel LA County will not enforce the businesses and the crime rate will escalate in our community.
- We do not believe LA County can enforce regulations with cannabis businesses. They do not have the resources

5-1 cont.



- We only have one South Los Angeles Sheriff car that is assigned to the Unincorporated LA County El Camino Village area. They cannot handle more crime in our small community.
- We strongly believe the cannabis industry should not be sandwiched into a community of residential areas or storefronts that back up to a residential community of young families and children.
- If you want to put the cannabis industry in LA County - why don't you put it in industrial areas like they do with micro breweries?

Sent from my iPhone

From: 3 plus 6 equals
To: DCBA CannabisEIR
Cc: 3 plus 6 equals
Subject: Corruption in los angeles county cannabis
Date: Monday, March 31, 2025 8:17:31 PM

CAUTION: External Email. Proceed Responsibly.

6-1

I believe it is unjust that Los Angeles County restricts cannabis cultivation licenses to specific parcels of land owned by a select group of individuals. This practice raises serious questions about fairness and transparency, as it appears to favor certain landowners through what could be perceived as a pay-to-play system. As a property owner, I should have the equal right to utilize my land for cannabis cultivation, particularly on parcels zoned A-2 for agricultural use. Denying other property owners the same opportunity undermines equitable access to economic opportunities.

Furthermore, Los Angeles County's current approach to cannabis production often results in indoor-grown products laden with pesticides and chemicals, which compromises consumer health. The absence of organic cannabis options in the county suggests a systemic issue, potentially driven by entrenched interests that limit market entry for new growers. A truly free and competitive market would allow broader participation by issuing licenses to all qualified applicants, encouraging cultivation in rural areas rather than concentrating it in urban centers. This would not only promote economic fairness but also address concerns about crime and overdevelopment in densely populated regions. Restricting access to licenses does a disservice to communities seeking to engage in legitimate agricultural enterprise.

CoPALM
Coalition for Prevention and Awareness in LA Metro

Coalition for Prevention and Awareness in LA Metro
520 S Lafayette Park Pl #560
Los Angeles, CA 90057

April 1, 2025

LA County Office of Cannabis Management
320 W. Temple St. Room G-10, Los Angeles, CA 90012

To The Office of Cannabis Management,

7-1

We are the Coalition for Prevention and Awareness in LA Metro (CoPALM), a group of engaged community members and organizations from the Metro Los Angeles area that work to prevent substance use and related harms. This public comment aims to inform the scope and content of the Program Environmental Impact Report (PEIR) for the Commercial Cannabis Business Permit Program for unincorporated Los Angeles County. When considering the environmental impact of this new program, there are several important factors that must not be overlooked. Increased traffic in these areas could lead to congestion and pollution, affecting both residents and businesses. The use and storage of flammable materials pose serious fire risks, especially in fire-prone regions. Additionally, odor control needs to be addressed to prevent strong cannabis smells from impacting nearby homes, schools, and public spaces. Beyond these immediate concerns, it's critical to think about future developments—such as new apartment complexes and smoke shops—that will shape neighborhoods and add to the overall environmental burden. These future developments should be properly considered when evaluating all of the above-mentioned issues.

A major concern is the lack of enforcement and regulation in unincorporated areas of Los Angeles County. While environmental protections and operational guidelines may exist on paper, the reality is that enforcement in these areas is often inconsistent or entirely absent. This means that issues like traffic congestion, odor control, and fire hazards may go unaddressed, creating long-term consequences for near by residents and businesses. Any proposed solutions to these environmental concerns must consider this lack of oversight into account and include strong, enforceable measures to ensure compliance. Without proper regulation and accountability, unincorporated communities risk becoming overwhelmed by unchecked development, leading to significant environmental and quality-of-life impacts.

We thank you for your time and consideration of these concerns. Overall, establishing more commercial cannabis business operations contributes to the environmental factors that are amplifying the vulnerability of the communities in these areas. The welfare of the surrounding community and consideration of alternative courses of action are appreciated.

Sincerely,

Jennifer Sernas

Jennifer Sernas
CoPALM Chair

Department of Cannabis Control
CALIFORNIA

Gavin Newsom
Governor

Nicole Elliott
Director

April 2, 2025

Fernando Nieto, Program Chief
Los Angeles County Office of Cannabis Management
320 W. Temple Street, Room G-10
Los Angeles, CA 90012
(213)-712-5459
Fnieto@dcba.lacounty.gov

Re: Initial Study (SCH No. 2025030223) – Commercial Cannabis Business Licensing Program

Dear Mr. Nieto:

Thank you for providing the California Department of Cannabis Control (DCC) the opportunity to comment on the Initial Study prepared by Los Angeles County for the proposed Commercial Cannabis Business Licensing Program (Proposed Project).

8-1

DCC has jurisdiction over the issuance of licenses to commercial cannabis businesses. DCC may issue a cultivation license to a business that meets all licensing requirements, and where the local jurisdiction authorizes these activities. (Bus. & Prof. Code, § 26012(a).) All commercial cannabis businesses within California require a license from DCC. For more information pertaining to commercial cannabis business license requirements, including DCC regulations, please visit: https://cannabis.ca.gov/cannabis-laws/dcc-regulations/.

DCC expects to be a Responsible Agency for this project under the California Environmental Quality Act (CEQA) because the project will need to obtain one or more annual cultivation licenses from DCC. In order to ensure that the Initial Study is sufficient for DCC's needs at that time, DCC requests that a copy of the document, revised to respond to the comments provided in this letter, and a signed Notice of Determination be provided to the applicant, so the applicant can include them with the application package it submits to DCC. This should apply not only to this Project, but to all future CEQA documents related to cannabis business applications in Los Angeles County.

DCC offers the following comments concerning the Initial Study.

General Comments (GCs)

8-2

GC 1: Impact Analysis

Several comments provided in the specific comment table below relate to the absence of information or support for impact conclusions in the document. CEQA requires that Lead Agencies

8-2 cont.

evaluate the environmental impacts of proposed projects and support factual conclusions with "substantial evidence." Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. In general, the Initial Study would be improved if additional evidence (e.g., regulatory setting, environmental setting, impact analysis and methodology, impact assessment) was provided to support all impact conclusions in the checklist, including the sources of information relied upon to make conclusions.

GC 2: Requirements for Mitigation Measures

When a CEQA document identifies impacts that are potentially significant, CEQA requires the Lead Agency to propose mitigation measures, where feasible, that may avoid, reduce, and/or minimize these impacts. According to the CEQA Guidelines, mitigation measures must be practical, specific, enforceable, effective, and roughly proportional to project impacts. This requires a Lead Agency to clearly disclose potential impacts and be sufficiently specific about prescribed mitigation measures. In several instances throughout the document, mitigation measures are not sufficiently specific to establish how such measures would minimize significant adverse impacts as a result of Proposed Project activities.

8-3

GC 3: Acknowledgement of DCC Regulations

The Initial Study does not acknowledge that the project would require one or more cannabis cultivation licenses from DCC. The document could be improved if it acknowledged that DCC is responsible for licensing, regulation, and enforcement of commercial cannabis business activities, as defined in the Medicinal and Adult Use Cannabis Regulation and Safety Act (MAUCRSA) and DCC regulations related to cannabis cultivation and distribution (Bus. & Prof. Code, § 26012(a)). In particular, the analysis could benefit from discussion of the protections for environmental resources provided by DCC's cultivation and distribution regulations. The impact analysis for each of the following resource topics could be further supported by a discussion of the effects of state regulations on reducing the severity of impacts for each applicable topic:

- Aesthetics (*See* 4 California Code of Regulations §16304(a).)
- Air Quality and Greenhouse Gas Emissions (*See* §§ 15020(e); 16304(a)(4); 16305; 16306.)
- Biological Resources (*See* §§ 15006(i); 15011(a)(11); 16304(a).)
- Cultural Resources (*See* § 16304(a)(3).)
- Energy (*See* §§ 15006(h)(6); 15011(a)(5); 15020(e); 16305; 16306.)
- Hazards and Hazardous Materials (*See* §§ 15006(h)(5)(c); 15011(a)(4); 15011(a)(12); 16304(a)(5)); 16307; 16310.)
- Hydrology and Water Quality (*See* §§ 15006(h); 15011(a)(3); 15011(a)(7); 15011(a)(11); 16304(a)(1); 16307; 16311.)
- Noise (*See* §§ 16304(a)(4); 16306.)
- Public Services (*See* §§15011(a)(10); 15036; 15042.)
- Utilities and Service Systems (*See* §§ 16311; 17223.)
- Wildfire (*See* § 15011(a)(10).)
- Cumulative Impacts (related to the above topics)

8-4

GC 4: Evaluation of Cumulative Impacts

It is important for CEQA analysis to consider the cumulative impacts of commercial cannabis business activities in Los Angeles County. Of particular importance are topics for which the impacts of individual projects may be less than significant, but where individual projects may make a considerable contribution to a significant cumulative impact. These topics include, but are not limited to:

- cumulative impacts from groundwater diversions on the health of the underlying aquifer, including impacts on other users and impacts on stream-related resources connected to the aquifer;
- cumulative impacts related to noise;
- cumulative impacts related to transportation; and
- cumulative impacts related to air quality and objectionable odors.

The Initial Study would be improved by acknowledging and analyzing the potential for cumulative impacts resulting from the Project coupled with other commercial cannabis business projects being processed by the County and any other reasonably foreseeable projects in Los Angeles County that could contribute to cumulative impacts similar to those of the Project.

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Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	DCC Comments and Recommendations
1	N/A	10-18	Project Description	The Initial Study could be more informative if it provided the permit(s) or approval(s) required from each of the agencies required for cannabis cultivation.
2	N/A	N/A	General Mitigation	The Initial Study should provide evidence to support the impact statements for each question in the checklist, including references for the sources of information relied upon to make conclusions. CEQA requires that Lead Agencies evaluate the environmental impacts of proposed projects and support factual conclusions with "substantial evidence." Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. (CEQA Guidelines, § 15384(b).)
3	I.	19-22	Aesthetics	The Initial Study would be improved if it referenced DCC's requirements that all outdoor lighting for security purposes must be shielded and downward facing, and that lights used in mixed-light cultivation activities must be fully shielded from sunset to sunrise to avoid nighttime glare (Cal. Code Regs., tit. 4 §§ 16304 (6) and (7)).
4	V.	31-32	Cultural	The Initial Study could be improved by including the following mitigation: "Suspend Cultivation Immediately if Cultural Resources Are Discovered, Evaluate All Identified Cultural Resources for California Register of Historical Resources Eligibility, and Implement Appropriate Mitigation Measures for Eligible Resources."
5	X	46-53	Hydrology and Water Quality	The Initial Study would be improved if it provided a quantified analysis of water availability and test results, either in the text or as

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	DCC Comments and Recommendations
				an attachment. In addition, the document would be improved if it referenced the state's requirements regarding proposed water sources and groundwater use. (Cal. Code Regs., tit. 4 § 16311)
6	XVII.	66-67	Tribal Cultural Resources	The Initial Study would be more informative by providing details pertaining to tribal consultations that have occurred for the Proposed Project, as required by Assembly Bill 52.
7	XVII.	66-67	Tribal Cultural Resources	The Initial Study would be improved if it referenced state requirements that ground disturbing work must be halted in the event of inadvertent discovery of Tribal Cultural Resources. (Health and Safety Code § 7050.5; Public Resources Code §§ 5097.94, 5097.98 and 5097.99).
8	XXI.(c)	76	Significant Unavoidable Impacts	The Initial Study concludes that the Proposed Program will result in a number of Significant and Unavoidable direct and cumulative impacts. These include impacts to air quality, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation, and utilities and service systems. Consequently, when DCC acts as a Responsible Agency in approving a cultivation license for applicants in the City/County, DCC will need to evaluate whether there are any feasible alternatives or mitigation measures that would substantially lessen or avoid those significant environmental effects over which DCC has authority (Cal. Pub. Res. Code §21002.1(b); Cal. Code Regs., tit.14, §15096(g)(2).) Further, if the local PEIR/EIR identifies significant effects pertaining to the activities that DCC is responsible for approving, then DCC must make findings required by Public Resources Code section 21081 and California Code of Regulations title 14, section 15091 and, if

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	DCC Comments and Recommendations
				needed, must adopt a statement of overriding considerations, as required by California Code of Regulations title 14, section 15093. (Cal. Code Regs., tit.14, §15096(h).) DCC, therefore, requests that the City/County provide applicants with supporting information relied upon in the City/County's findings, for DCC's subsequent consideration.
9	N/A	N/A	Source List	The Source List would be improved if it provided additional information regarding some of the references. For referenced documents, the author, title, and date of each document could be provided. For personal communications, the agency or organization, person contacted, date of contact, and method of contact should be provided. For websites, the URL and date visited should be provided. In addition, sources that are project-related studies could be made available via weblink or as attachments. Also, no source is identified for traffic-related information and estimates.

Conclusion

DCC appreciates the opportunity to provide comments on the Initial Study for the Proposed Project. If you have any questions about our comments or wish to discuss them, please contact Kevin Ponce, Senior Environmental Scientist Supervisor, at (916) 247-1659 or via e-mail at Kevin.Ponce@cannabis.ca.gov.

Sincerely,

Kevin Ponce
Licensing Program Manager

From: Marilyn
To: DCBA CannabisEIR
Subject: Public Comment Cannabis Ordinance Unincorporated LA County
Date: Thursday, April 3, 2025 4:46:20 PM

CAUTION: External Email. Proceed Responsibly.

Hello,

Here is my public comment regarding the Cannabis Ordinance:

9-1

- I participated in your last call and was s spoke about my concern with LA County being able to enforce a cannabis ordinance. I do not believe they have the manpower to provide enforcement. I work closely with LA County Supervisors Office, DEC, Sheriff, Parking Enforcement on food vendor issues in Unincorporated LA County El Camino Village. For over three years, these departments have not been able to prevent the illegal food vendors that are becoming more and more in our area. We continually hear they do not have the manpower.

- Two 8 story high housing developments have been approved for the Crenshaw Blvd strip between Marine and 154th. One development at 15101 Crenshaw Blvd will be 212 units (EPIC LA Plan Number: RPPL2024002390) and one development at 15333 Crenshaw Blvd will be 253 units (EPIC LA Plan Number: RPPL2024003666). What is the environmental impact to the area with the increase of residents living in these two housing developments? This was brought up in your last call and we were told you would look at these two developments and evaluate for environmental issues. When these two developments were approved, the CEQA was not done to determine the impact to the community.

- As mentioned on your call by many commenters, LA County is famous for not enforcing ordinances. They do not have the manpower. And, often County has given us many mixed instructions on who is responsible for enforcement.

- If an ordinance is created for cannabis, there needs to be very detailed enforcement policies, procedures and have it spelled out very clearly on who will be providing the enforcement and how enforcement will be done.

- LA County often states " We have an educational approach" when it comes to new ordinances. This is an ordinance that needs to be enforced and not "educational first". We constituents are tired of the illegal businesses having priority over the tax payers and their quality of life and safety. Why should public safety be put at risk for someone to have a business?

- We have a rehabilitation BHS facility that is less than 600 feet from a storefront area you have on your map (154th and Crenshaw Blvd. that would be allowed to be a cannabis merchant. This should not be an area for a storefront.
    - And, today there is an illegal cannabis store in the complex that has patrons smoking their purchase right out in front of the store. People are walking by with their kids having to see this and smell this. This is a big public safety issue.

- There is a licensed daycare at 15126 Eriel Avenue, Gardena and is too close to a possible cannabis storefront.

- South LA Sheriff has one car that serves El CaminoVillage and is also patrolling other areas in South LA.

- Gardena is across Crenshaw Blvd and does not allow cannabis sales in their community.

- Unincorporated LA County El Camino Village is1 mile square we do not need cannabis sales in our community. We have 4 schools in our area and kids range from elementary to college.

- There is Alondra Regional Park in our community and we do not feel brining cannabis into this community will be good with a park so close. It opens the doors for new problems at the park and they are already dealing with homelessness.

I highly recommend that LA County DOES NOT allow cannabis sales, testing or anything related to cannabis in this small community called Unincorporated LA County - El Camino Village.

Marilyn C
Resident of El Camino Village for 10 Years

From: Sandy Logan
To: DCBA CannabisEIR
Subject: Public Comment
Date: Thursday, April 3, 2025 8:01:48 PM

CAUTION: External Email. Proceed Responsibly.

Good evening,

10-1

As a proud resident of Lancaster, California, and a public health professional, I am firmly opposed to the conversation surrounding the increase of cannabis retailers in our community for several compelling reasons.

Firstly, the environmental impact of the cannabis industry is alarming. Our air quality in the Antelope Valley is already poor, and adding more cannabis operations will only exacerbate this critical issue.

Moreover, the hazardous waste, chemicals, and materials generated from cannabis production present serious risks. Following the recent fires in January 2025, we have already faced challenges with hazardous waste in our landfills. It is crucial to understand how this could negatively affect our families and residents.

The greenhouse gas emissions associated with cannabis operations are another major concern that cannot be ignored.

Additionally, increasing access to cannabis will inevitably lead to greater consumption among our youth. Our community, the Antelope Valley, is already underserved and lacks sufficient resources for its residents. We cannot afford to compromise the well-being of our youth by expanding cannabis access.

Before you consider permitting more cannabis retailers, I urge you to evaluate the damage that the current cannabis industry has already caused in communities with existing shops. We should prioritize cleaning up these problems and focus on enhancing law enforcement efforts to shut down unlicensed cannabis operations that persist.

Increase the buffer zone to 1000 feet for youth sensitive area

I strongly advocate against allowing any further cannabis businesses in unincorporated areas.
Let's work together to protect our community.

Sandy Logan
93534

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Docusign Envelope ID: E2C3F78C-DEC7-4EA6-A00A-F05190CB1EB4

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

Via Electronic Mail Only

April 4, 2025

Fernando Nieto, Program Chief
County of Los Angeles
Department of Consumer and Business Affairs
Office of Cannabis Management
320 W. Temple Street, Room G-10
Los Angeles, CA 90021
CannabisEIR@dcba.lacounty.gov

SUBJECT: NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES COUNTY COMMERCIAL CANNABIS BUSINESS LICENSING PROGRAM, SCH #2025030223

Dear Fernando Nieto:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (DPEIR) for the Los Angeles County Commercial Cannabis Business Licensing Program (Project) with the County of Los Angeles (County) as lead agency pursuant to the California Environmental Quality Act (CEQA) (CEQA Guidelines, §§15367, 15051). CDFW supports the regulated cannabis market and actively seeks ways to partner with the regulated community and agency partners to avoid impacts to environmental resources and to achieve conservation benefits. CDFW also commends the County's efforts to regulate cannabis business activities and to address some of the many substantial environmental impacts that can accompany this use. We appreciate the opportunity to partner with the County to create a mutually beneficial relationship that protects and conserves California's natural resources and supports legal cannabis businesses. We also recognize the value in being able to provide comments early in the CEQA process regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under Fish and Game Code (FGC).

CEQA ROLE

11-1

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. [a] & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, § 15386, subd. [a]). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). For purposes of CEQA, CDFW is directed to provide available biological expertise during public agency

Docusign Envelope ID: E2C3F78C-DEC7-4EA6-A00A-F05190CB1EB4

11-1 cont.

environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State of California (State) fish, plant, and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, §15381, 15096). CDFW expects that it may need to exercise regulatory authority as provided by the FGC, including lake and streambed alteration (LSA) regulatory authority (Fish & G. Code, § 1600 et seq.). To the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), obtain appropriate authorization under FGC (Fish & G. Code, §§ 2080.1, 2081, 2835).

CANNABIS PERMITTING ROLE

The California Department of Cannabis Control (DCC) establishes regulations for cannabis businesses and issues licenses for commercial cannabis cultivation projects in in the State. To obtain a cannabis cultivation license from DCC, an entity must provide evidence of enrollment in an order or waiver of waste discharge requirements with the State Water Resources Control Board (SWRCB) or the appropriate Regional Water Quality Control Board. SWRCB's Cannabis Cultivation Policy establishes principles and guidelines for cannabis cultivation activities to protect water quality and instream flows, many of which are complementary to FGC (Fish & G. Code, §§ 1602, 5650, 5652, Water C. §§ 13260, 13264(a) & 13265). SWRCB's Cannabis Cultivation Policy includes a Cannabis Cultivation General Order (General Order) that describes waste discharge requirements for different categories of cannabis cultivation. SWRCB's Cultivation Policy also includes standards for setbacks from classes of streams and measures to manage water use to project resources including forbearance provisions. Another requirement to obtain a cannabis cultivation license from DCC is for an entity to provide a final LSA Agreement (Agreement) issued by CDFW, or written verification from CDFW that an Agreement is not required (Business and Professions Code 260.60.1 (b) (3)).

CDFW has regulatory authority over activities in the State that will substantially divert or obstruct the natural flow, or change the bed, channel, or bank of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, an entity must provide a LSA Notification (Notification) to CDFW of the proposed activities (Fish & G. Code, § 1602 et seq.). Based on the information contained in the Notification, CDFW then determines whether an Agreement is required prior to conducting the proposed activities. CDFW's issuance of an Agreement is an action subject to CEQA that will require CDFW to function as a Responsible Agency (CEQA Guidelines, §15381). CDFW anticipates using the DPEIR to facilitate implementation of LSA and CESA review for the State's cannabis permitting program in the County. To minimize the need for additional CEQA review when contemplating issuance of Agreements or CESA authorization for cannabis uses, CDFW recommends the DPEIR fully identify the potential impacts to listed species, streams and riparian resources, and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of Agreements or CESA authorizations (CEQA Guidelines, § 15096).

Docusign Envelope ID: E2C3F78C-DEC7-4EA6-A00A-F05190CB1EB4

11-1 cont.

BACKGROUND

On February 15, 2022, the Los Angeles County Board of Supervisors (Board) directed relevant County departments to move forward with the development and implementation of Commercial Cannabis Business Licensing Program for unincorporated areas of the County. In accordance with this directive, the County is proposing amendments to Title 22 (Zoning Ordinance Amendments) and Title 8 (Commercial Cannabis Administration Amendments) to allow for the permitting of legal commercial cannabis uses in eligible zone districts in unincorporated areas of Los Angeles County. The County noticed the NOP for the Commercial Cannabis Business Licensing Program on March 5, 2025, and has requested comments by April 4, 2025. The NOP included an Initial Study for the Commercial Cannabis Business Licensing Program (CEQA Guidelines, §15063).

PROJECT DESCRIPTION

The County is proposing to adopt a Commercial Cannabis Business Licensing Program that would permit, regulate, and monitor all cannabis businesses in unincorporated areas of Los Angeles County. All outdoor and mixed-light cultivation activities/businesses would be prohibited. The Project would permit: 1) ten indoor cannabis cultivation licenses in industrial zones that would be limited to the use of artificial lighting and a maximum canopy size of 22,000 square feet; 2) ten manufacturing licenses in select industrial zones (volatile manufacturing) and in select commercial and industrial zones (non-volatile manufacturing); 3) ten distribution licenses in select commercial and industrial zones; 4) ten cannabis testing licenses in select commercial/mixed-use, industrial, and institutional zones; and 5) twenty-five storefront and twenty-five non-storefront cannabis retail businesses in commercial/mixed-use and industrial zones.

All cannabis business activities would be required to be located entirely within constructed and permitted structures that are legal and conform to Los Angeles County Code (LACC). The Project would not permit the development of new buildings or the redevelopment of existing buildings to accommodate a proposed cannabis business. However, exterior site development, such as access and drainage improvements, lighting, signage, landscaping, and fencing, may occur and would be subject to applicable standards of the LACC.

The Project will prohibit cannabis businesses: 1) on public lands and within the designated Significant Ecological Area (SEA); 2) within 600 feet of a youth-oriented use; 3) within 600 feet of a drug abuse and recovery treatment center; and 4) storefront retail cannabis businesses within 500 feet of another retail cannabis business.

COMMENTS AND RECOMMENDATIONS

CDFW supports the County's efforts to regulate cannabis cultivation and to address its many potentially substantial environmental impacts in the upcoming DPEIR. CDFW believes having the appropriate analysis and mitigation in the DPEIR is essential for program implementation to distinguish between individual cannabis business projects

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11-1 cont.

that would not require additional/subsequent review and those that would require additional assessments, and potentially additional CEQA review, to address sensitive resources and to minimize the environmental impacts of cannabis cultivation. We believe that, in concept, providing a streamlined and possible ministerial pathway for subsequent projects under the DPEIR that are unlikely to adversely impact public trust resources will be beneficial to: a) avoid and discourage development in sensitive habitats, and b) support the legal market. CDFW is therefore providing comments at a programmatic level to identify projects that should be excluded from any ministerial process unless sufficient information is provided to assure that all impacts to sensitive resources can be avoided, and where unavoidable, can be adequately mitigated to less than significant.

CDFW offers the comments and recommendations below to assist the County in further developing the Los Angeles County Zoning Ordinance and Commercial Cannabis Administration text amendments and environmental analysis for the Project to adequately identify, avoid, and/or mitigate the Project's significant, or potentially significant, direct, indirect, and cumulative impacts on fish and wildlife (biological) resources. Our comments include: 1) a review of types of environmental impacts from cannabis cultivation; 2) focused recommendations for the DPEIR analyses; 3) general comments; and 4) proposed future collaboration with the County.

11-2

Environmental Impacts of Cannabis Cultivation

CDFW devotes a considerable amount of staff time and resources documenting, assessing, permitting, and addressing the environmental impacts and watershed restoration needs resulting from cannabis cultivation (Bauer et al. 2015). CDFW has documented effects to wildlife resources in its *Review of the Potential Impacts of Cannabis Cultivation on Fish and Wildlife Resources* (CDFW 2018), including impacts from water diversions and stream dewatering, habitat clearing and conversion, pollution, and sediment discharges. Through site visits conducted for permitting, compliance, and enforcement throughout southern California, including the County, CDFW has knowledge and experience on the types and extent of potential impacts cannabis uses can have on the environment at a project and programmatic level, which can be unique compared to other agricultural uses. Impacts from cannabis cultivation of specific concern to CDFW include, but are not limited to (CDFW 2018): (1) habitat fragmentation, conversion, degradation, and loss through land clearing, including direct impacts to riparian areas, wetlands, grasslands, sage scrub, and other sensitive natural communities; (2) alteration to streams from grading and excavation/filling; (3) diversion of water for irrigation and effects to in-stream flows; (4) impacts to stream resources from dewatering activities; (5) degradation of water quality from delivery of sediment, nutrients, petroleum products, and pesticides into streams; (6) road building, grading, pond construction, stream crossing construction, increased use of poorly maintained road systems, barriers to fish passage (Fish & G. Code, § 5901), and hydrologic modification including rerouting of streams; (7) effects to wildlife movement from security fencing, including potential wildlife entanglement, entrapment, and mortality; (8) reduced habitat function due to inappropriate location of grow sites; (9) loss of avian foraging habitat due to hoop house construction; (10) development and uses within

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11-2 cont.

riparian buffers; (11) impacts from night lighting and noise on wildlife; (12) impacts to wildlife from use of plastic monofilament netting and similar products; and pollution to the environment from trash and other cultivation related waste (Carah et al. 2015); and (13) introduction of non-native species (fish and plants) resulting in predation of native species and degraded habitat quality.

Comments and Recommended Measures

CDFW recommends the DPEIR provide adequate and complete disclosure of the Project's potential impacts to fish and wildlife resources (biological resources) including the effects documented by CDFW [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003, subd. (i), & 15151, 15063]. CDFW also recommends that the DPEIR include both programmatic (cumulative) level and project-specific analysis to the extent feasible, and clearly identify criteria and mechanisms where Cannabis business projects would require subsequent review and analysis so that appropriate standards and mitigation can be implemented at the project level. CDFW anticipates using the DPEIR to help implement the permitting needed under the State's cannabis program, which may include discretionary permitting under CESA and LSA (CEQA Guidelines, §15381, 15096).

11-3

Specific Comments

1. Cannabis Business Eligibility Areas. The Initial Study beginning on page 11 states that the Project would allow cannabis businesses only in constructed and existing permitted structures that are legal and conform to Los Angeles County Code (LACC). The Project would not permit the development of new buildings or the redevelopment of existing buildings to accommodate a proposed cannabis business. Further, the Project would prohibit cannabis businesses within the designated Significant Ecological Area (SEA). CDFW interprets at this stage that "constructed and permitted structures" means existing constructed and permitted structures when the NOP was published (CEQA Guidelines, § 15125). The Initial Study on page 15 provides a link to mapping[1] that shows proposed cannabis business permit eligibility areas in unincorporated Los Angeles County; however, it is unclear how the areas in the map were determined. Based on our review of aerial imagery and the best information available, many of the eligible areas in Antelope Valley appear to be undeveloped; therefore, these areas would require the construction of new structures compared to existing conditions for cannabis activities (see Attachment A, Figure 1). Moreover, some eligible areas are mapped within the SEA (see Attachment A, Figure 2). Many of these undeveloped areas currently shown as eligible for cannabis uses include sensitive habitats, including stream resources, and are within areas identified by CDFW as regionally important to conserving natural resources and to enhance resiliency to climate change,

[1]County mapping of cannabis permitting eligibility areas is available at: https://amecei.maps.arcgis.com/apps/instant/basic/index.html?appid=2c7641e8c0e347049d2271789eb0525c

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11-3 cont.

ecological processes, wildlife connectivity, and species conservation (Fish and Game Code §1850 (b) and (d)) (see Attachment A, Figure 2).

Recommendation: The DPEIR should include a description of how the eligibility areas were determined and provide an updated eligibility area map that only includes parcels that meet the criteria outlined in the Project for acceptable cannabis business locations, including parcels that have existing structures and parcels outside the SEA. CDFW also recommends the DPEIR include an analysis of the Project's consistency with the Antelope Valley Regional Conservation Investment Strategy (AVRCIS; see ICF 2021).

2. Biological Resources. The Initial Study on page 29 indicates that there will be no impacts to biological resources as "[c]ommercial 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." However, as described above, there is a discrepancy between the text of the Initial Study beginning on page 11 that indicates cannabis businesses would only be allowed in constructed and permitted structures, and the mapped eligibility areas cited in the Initial Study on page 15 that shows undeveloped lands as eligible cannabis areas. As described above, these undeveloped lands support biological resources.

   Recommendation: If these undeveloped areas will be retained as eligible areas for cannabis businesses, there would a potentially significant impact to biological resources on an individual and cumulative basis from habitat loss from pad development and construction, access and drainage improvements, fencing, lighting, utility installation, and other site improvements needed to support cannabis uses. These undeveloped lands may also support plants and animals considered sensitive under CEQA including but not limited to alkali mariposa-lily (*Calochortus striatus;* California Rare Plant Rank (CRPR) 1B.2), Rosamond eriastrum (*Eriastrum rosamondense;* CRPR 1B.1), Parry's spineflower (*Chorizanthe parryi var. parryi*; CRPR 1B.1), Lancaster milk-vetch (*Astragalus preussii var. laxiflorus*; CRPR 1B.1), northern California legless lizard (*Anniella pulchra*; California Species of Special Concern (SSC)), mountain plover (*Charadrius montanus*; SSC), northwestern pond turtle (*Actinemys marmorata*; SSC), coast horned lizard (*Phrynosoma blainvillii*; SSC), Le Conte's thrasher (*Toxostoma lecontei*; SSC), two-striped gartersnake (*Thamnophis hammondii*; SSC), short-eared owl (*Asio flammeus*; SSC), California red-legged frog (*Rana draytonii*; SSC), arroyo toad (*Anaxyrus californicus*; SSC), American badger (*Taxidea taxus*; SSC), western spadefoot toad (Spea hammondii; SSC), southern grasshopper mouse (*Onychomys torridus ramona*; SSC), Tehachapi pocket mouse (*Perognathus alticola inexpectatus*; SSC), western mastiff bat (*Eumops perotis californicus*; SSC), southwestern pond turtle (*Actinemys pallida*; SSC), loggerhead shrike (*Lanius ludovicianus*; SSC), Townsend's big-eared bat (*Corynorhinus townsendii*; SSC), California glossy snake (*Arizona elegans occidentalis*; SSC) western Joshua tree (*Yucca brevifolia;* CESA-candidate), western burrowing owl (*Athene cunicularia hypugaea*; CESA-candidate), Crotch's

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11-3 cont.

bumble bee (*Bombus crotchii*; CESA-candidate), Swainson's hawk (*Buteo swainsoni;* CESA-Listed), Mojave ground squirrel (*Xerospermophilus mohavensis;* CESA-Listed), Nelson's antelope squirrel (*Ammospermophilus nelsoni*; CESA-Listed), southern California steelhead (*Oncorhynchus mykiss irideus;* CESA-listed), unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni;* fully protected), golden eagle (*Aquila chrysaetos*; fully protected), white-tailed kite (*Elanus leucurus*; fully protected), and tricolored blackbird (*Agelaius tricolor*; CESA-Listed) (CEQA Guidelines, §15380). Therefore, CDFW disagrees that there would be no impacts to biological resources from the Project as currently presented in the NOP. While these undeveloped areas would be developed under existing County regulations, these areas may not have been developed without the intent of being utilized for cannabis business activities; therefore, the DPEIR should analyze the impacts to biological resources associated with habitat loss, fencing, water use, runoff, lighting, noise, and landscaping from non-cannabis development later being converted to cannabis uses.

3. Habitat Loss. Development of a site can result in direct impacts to sensitive habitat from grading, clearing, type conversion, and grubbing of existing vegetation, which can have numerous impacts on the local ecosystem and to sensitive flora and fauna. For example, vegetation removal or conversion (from grassland to agriculture) for pad development, site access, utility installation, drainage improvements, and canopy placement associated with cannabis uses may result in the loss of sensitive habitat that supports special status plant and animal species.

   Recommendation: If any undeveloped land is proposed to support cannabis uses (or non-cannabis development that would later be converted to cannabis use), the DPEIR should analyze the potential loss of sensitive habitat from direct removal and type conversion including grassland, coastal sage, riparian, and other habitat alliances, from type conversion, direct loss from pad development, site access, fuel management, and operational issues associated with cannabis activities.

11-4

4. Altered Hydrology and Water Quality. Development or conversion of a site for cannabis uses can result in changes in impervious surface coverage, stormwater drainage patterns, and landscape irrigation can alter the hydrology of stream resources and open space areas. This can affect the availability of water resources, soil moisture, and overall habitat integrity. Cannabis operations typically use pesticides and fertilizers, which can be incorporated into irrigation practices and may enter the watershed and groundwater basins through runoff and enter nearby tributaries and streams. Discharges of residual cultivation irrigation water to locations other than the public sewer can also degrade water quality and impact sensitive species.

   Recommendation: The DPEIR should analyze hydrological changes that may result from the Project. This includes the addition of stormwater infrastructure and ongoing operation and maintenance activities on water quality of stream resources and its effects on sensitive species on a watershed level, such as the effects by Hydrological Unit Code (HUC) 12s. The DPEIR should also provide a mechanism

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11-4 cont.

for analyzing and mitigating potential impacts to hydrology and water quality at the individual (site) level.

5. Stream Crossings. Development or conversion of a site for cannabis use often require access improvements including new crossings or maintenance of existing crossings over streams and through sensitive habitat that can support wildlife movement at the site and regional level. Crossings can be at-grade, culverts, and bridges to allow access to growing locations, water sources, and other cultivation activities. If not designed properly, structures designed to accommodate site access can create or exacerbate fish passage issues (Fish & G. Code § 5901), alter the flow of streams, erode stream banks, impede wildlife movement, become hydraulic constrictions, and create scour and increase sedimentation to streams.

   Recommendation: The DPEIR should analyze the need for stream crossings, or the installation of any in-stream structures for cannabis activities and identify the types of studies, design standards, and mitigation measures that would be needed for individual projects to address fish passage, sedimentation, wildlife movement, and prevent stream erosion. The DPEIR should also analyze the Project's potential effect to stream habitat/resources from the construction and maintenance of stream crossings and any other proposed instream structures for site access and other project needs. Potential impacts include fish passage, wildlife use and movement, wetland vegetation, bank erosion, and stream hydrology. The DPEIR should also provide a mechanism for analyzing and mitigating potential impacts to sensitive habitat and species from installation and operation of stream crossings at the individual (site) level.

11-5

6. Limited Site Alterations. The Initial Study on pages 19 and 30 indicates that exterior site improvements on developed sites may occur and would be limited to features such as fencing, lighting, and landscaping. Any exterior site developments would be subject to existing and proposed County regulations. As described in Comment 1 above, some of the Project's eligible areas, as currently presented in the NOP, contain stream resources and other watercourses (see Attachment A, Figure 2), abut or are within the designated SEA, or are adjacent to undeveloped lands. Site improvements including lighting, fencing, and landscaping could affect adjacent or on-site biological resources.

   a. Lighting. Lighting is often required for cannabis businesses for security purposes. If not designed appropriately, lighting can significantly interrupt species circadian rhythm and alter species behavior, including migration, breeding, and foraging behaviors (Rich et al. 2020).

      Recommendation: The DPEIR should analyze impacts from lighting required for cannabis projects to wildlife. The DPEIR should quantify the amount of new lighting that would be introduced and analyze the effects on sensitive species and habitats. Project lighting should be lighting of the lowest illumination necessary, shielded downwards, and directed away from sensitive habitats.

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11-5 cont.

The DPEIR should also provide a mechanism for analyzing and mitigating for potential impacts from lighting at the individual (site) level.

b. Fencing. Cannabis businesses often require specific types of fencing for security purposes. If not located and designed properly, this type of fencing can result in wildlife entrapment or mortality, create barriers and impede wildlife movement, and significantly alter wildlife connectivity at the local and regional level.

Fencing can be a hazard to wildlife causing entanglement and mortality (Van der Ree 1999, Stuart et al. 2001, Harrington and Conover 2006). Running animals and low-flying birds may not see a wire fence clearly against the landscape. Birds can collide with fences, breaking wings, impaling themselves on barbs, and tangling in wires. Large, low-flying birds such as ducks, geese, cranes, grouse, hawks, and owls are especially vulnerable. Waterfowl can fly into fences that run near or across waterways, and low-flying hawks and owls may careen into fences when swooping in on prey.

Security fencing is typically at least 6 feet high with a solid material covering to obstruct views of the site from the outside. New cannabis cultivation would need to comply with County standards for security fencing, which are typically greater than that of a typical business operation. The additional security required for cannabis operations may introduce new impediments in the landscape that do not currently exist that directly affect local wildlife in all areas of the County directly through entrapment and/or mortality and indirectly through altering available habitat for movement at the site and regional level. This type of fencing for security can cause inadvertent injury and loss of wildlife resulting in a significant impact on fish and wildlife resources.

Recommendation: The DPEIR should analyze impacts from required security measures and other fencing/barriers required for cannabis projects to animal species and wildlife movement/connectivity. The DPEIR should include information on the height, length, type of materials, maintenance requirements, and location of fencing that would be needed for cannabis uses. The DPEIR should also provide a mechanism for analyzing and mitigating potential impacts from fencing at the individual (site) level.

c. Landscaping. Landscaping is often required to obscure or screen cannabis activities from the public's view. Landscaping has the potential to impact biological resources from the introduction of invasive and/or non-native species. Landscape maintenance can also impact biological resources from the use of pesticides, herbicides, and fertilizers.

Recommendation: The DPEIR should evaluate the potential of impacts of landscaping (e.g., introducing non-native and invasive species, pesticide and herbicide use) on biological resources such as natural communities adjacent to the cannabis business sites. CDFW supports the use of native plants for the

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11-5 cont.

Project especially in eligible areas located adjacent to open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping, particularly any species listed as 'Moderate' or 'High' by the California Invasive Plant Council. CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the proposed cannabis business site. In addition, CDFW supports planting species of trees, such as oaks (*Quercus* genus) where appropriate, and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. CDFW supports planting species of vegetation with high insect and pollinator value. Finally, the DPEIR should also provide a mechanism for analyzing and mitigating potential impacts from landscaping at the individual (site) level.

11-6

7. Water Use. The Project has potential to permit cannabis businesses that may utilize well water as the primary water source. Water use and diversions for cannabis cultivation can substantially affect water availability in streams and reduce habitat and movement for species including aquatic and avian wildlife. Sufficient stream flows are essential for fish passage and breeding habitat for aquatic species.

   Recommendation: The DPEIR should analyze the potential for well water use associated with cannabis cultivation projects to impact instream flows and water availability for aquatic-dependent wildlife and habitat. CDFW also recommends the County assess the aquatic carrying capacity of watersheds where cannabis would be allowed. CDFW also recommends the County assess the aquatic carrying capacity of watersheds where cannabis would be allowed and not utilize municipal water sources. The focus of the assessment should be to determine the maximum water use availability from watersheds to maintain adequate water supply for fish and wildlife resources, considering the cumulative demand from existing and future permitted cannabis cultivation projects. The DPEIR should also provide a mechanism for analyzing and mitigating potential impacts from water use at the individual (site) level.

11-7

8. CESA. Undeveloped areas eligible for cannabis businesses may contain CESA candidate or listed species, including but not limited to western Joshua tree, Crotch's bumble bee, western burrowing owl, Mojave ground squirrel, Swainson's hawk, Nelson's antelope squirrel, tricolored blackbird, San Fernando Valley spineflower, least Bell's vireo, desert tortoise, southern California steelhead, unarmored threespine stickleback, golden eagle, and white-tailed kite. CDFW considers adverse impacts to a species protected by CESA to be significant. Take of any endangered, threatened, candidate species, or NPPA-listed plant species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under

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11-7 cont.

CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA permit.

Recommendation: To ensure CDFW will be able to use the County's CEQA document for the issuance of an ITP, the DPEIR should address all Project impacts to CESA-listed species and specify a mitigation, monitoring, and reporting program that will meet the requirements of an ITP.

11-8

9. Baseline Conditions. Under CEQA, the environmental setting represents the conditions that exist at a certain point in time referred to as the "baseline" from which project impacts, individual and cumulative, must be evaluated (CEQA Guidelines, § 15125). Setting baseline conditions will direct the analyses in the DPEIR and corresponding avoidance, minimization, and mitigation measures.

   Recommendation: The DPEIR should include the following information:

   a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines, § 15125[c]).

   b. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*.[2]

   c. Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the project area and within adjacent areas.

   d. A complete and recent assessment of the biological resources associated with each habitat type in the project area and within adjacent areas. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003[i]).

   e. A complete, recent assessment of endangered, rare, or threatened species and other sensitive species within the project area and adjacent areas, including California Species of Special Concern (SSC) and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380).

   f. A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a period of one year and

[2] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline

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11-8 cont.

assessments for rare plants may be considered valid for a period of up to three years.

The DPEIR should include a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. A complete and accurate baseline analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures.

As part of setting baselines conditions for the DPEIR, CDFW recommends that existing unpermitted cultivation sites in the County be accounted for and the DPEIR identify measures to address associated impacts to environmental resources affected by unpermitted cultivation sites (CEQA Guidelines, § 15125, Pub. Resources Code §§ 21060, 21068). All environmental resource areas for unpermitted facilities should be evaluated. CDFW and partner law enforcement agencies have investigated over 160 unpermitted outdoor cannabis cultivation sites in the Antelope Valley area of the County. CDFW often finds significant environmental damage at unpermitted outdoor cultivation sites, including stream alterations without LSA notification (Fish & G. Code, § 1602), pollution (Fish & G. Code, §§ 5650 and 5652), and take of western Joshua tree (Fish & G. Code, § 2080). Unpermitted cultivation sites in Antelope Valley may also impact other CESA-listed or candidate species, including but not limited to western burrowing owl, Crotch's bumble bee, Mojave ground squirrel, Nelson's antelope squirrel, Swainson's hawk, and desert tortoise. Unpermitted cannabis activities along the Santa Clara River may impact other species, including but not limited to southern California steelhead and unarmored threespine stickleback. CDFW considers existing cannabis violations that have not been remediated when the NOP was issued as part of the CEQA baseline. The DPEIR should also analyze potential impacts from compliance and enforcement activities that can be foreseeably associated with the Project. CDFW believes that partnering with the County through a legal permitting program as currently proposed will assist in reducing the extent of unpermitted cannabis activities in Los Angeles County.

10. Cumulative Impacts. Cumulative impacts on biological resources can result from collectively significant projects which are individually insignificant. The Project, when considered collectively with prior, concurrent, and probable future projects, may have a significant cumulative effect on biological resources. The DPEIR should include a cumulative effects analysis as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and natural communities. If the County determines that the Project would not have a cumulative impact, the DPEIR should indicate why the cumulative

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impact is not significant. The County's determination should be supported by facts and analyses (CEQA Guidelines, § 15130[a][2]).

Recommendation: CDFW recommends that the cumulative section of the DPEIR include an analysis of: (1) the amount and location of acreage by community plan area, watershed, or other attributes that could be converted to cannabis uses with corresponding loss of habitat and impacts to species using the most recent vegetation and species occurrence data and mapping for the County; (2) the amount and location of water demand by major streams and watersheds in the County; (3) the Project's growth inducing impact by facilitating undeveloped lands to cannabis business uses with related increased demand for water; (4) all cannabis sites when determining cumulative impacts of commercial cannabis businesses through the County's licensing program, including a quantification of known impacts of unpermitted cultivation sites and an estimation of impacts due existing unpermitted cultivation sites (see Comment 9); (5) the potential for additional unpermitted cannabis cultivation; (6) cannabis cultivation sites that may have been abandoned without remediation; and (7) the location and extent of fencing anticipated for cannabis projects and its potential direct impact to animal species from entrapment/entanglement and impacts to wildlife movement and habitat connectivity (CEQA Guidelines, §§ 15130(a), 15065(a)(3) and 15355).

11. Consistency with Other Adopted Wildlife Plans and Policies. Several regional and State-wide natural resource conservation strategies may be applicable to the Project, including, but not limited to : *Antelope Valley Regional Conservation Investment Strategy* (ICF 2021);[3] *Safeguarding California Plan: 2018 Update* (CNRA 2018);[4] *California State Wildlife Action Plan: A Conservation Legacy for Californians* (CDFW 2015);[5] and *California 2030 Natural and Working Lands Climate Change Implementation Plan: January 2019 Draft* (Cal EPA et al. 2019).[6] In the *California State Wildlife Action Plan* (CDFW 2015),[7] climate change is identified as a significant stressor on the Conservation Targets and Strategies for all habitat types in the South Coast Region.

    Recommendation: The DPEIR should include analysis of the Project's consistency with State adopted plans and policies including the plans and policies described above. The DPEIR should include analysis of program impacts to climate change from increased greenhouse gas emissions and factor it into applicable flood and storm events in hydraulic analysis to support site development including access and stream crossings.

12. Conserved Lands. The Project area includes existing protected areas that are public or private lands where the primary intent of land management is to manage

[3] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=197234&inline
[4] resources.ca.gov/CNRALegacyFiles/docs/climate/safeguarding/update2018/safeguarding-california-plan-2018-update.pdf
[5] https://wildlife.ca.gov/SWAP/Final
[6] https://ww2.arb.ca.gov/resources/documents/nwl-implementation-draft
[7] https://wildlife.ca.gov/SWAP

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11-8 cont.

the land for open space, primarily for their ecological functions and values. In the Antelope Valley RCIS area, there are 55,928 acres of protected area, including 3,112 acres in conservation easement. The two largest private owners of protected lands within the RCIS area are Transition Habitat Conservancy (THC) and Petersen Ranch Mitigation Bank (Figure 2-19 and Table 2-8 of the AVRCIS; see ICF 2021). Other prominent conserved land includes the Antelope Valley Poppy Preserve, Saddleback Butte State Park, Alpine Butte Wildlife Sanctuary, Mescal Wildlife Sanctuary, Mountains Recreation Conservation Authority (MRCA) property, Jackrabbit Flats Wildlife Sanctuary, Payne Wildlife Sanctuary, Phacelia Wildlife Sanctuary, Big Rock Creek Wildlife Sanctuary, Carl O. Gerhardy Wildlife Sanctuary, and Puzzle Creek Conservation Bank.

Recommendation: The DPEIR should identify all conserved lands in the Project area and analyze how cultivation activities could result in potential impacts to these resources from habitat loss, access and drainage improvements, fencing, lighting, utility installation, pesticide drift, runoff, and other activities needed to support cannabis uses. The analysis should account for sufficient buffer areas from these lands and cultivation uses. Finally, the DPEIR should also provide a mechanism for analyzing and mitigating for potential impacts to public and other conserved lands from cannabis activities at the individual (site) level.

11-9

General Comments

1. Disclosure. The DPEIR should provide an adequate, complete, and detailed disclosure about the effects which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Such disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).

2. Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the DPEIR.

    a. A complete discussion of the purpose and need for, and description of the proposed Project.

    b. A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends the County select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends the County consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a general rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for

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11-9 cont.

vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

c. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The DPEIR shall include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).

d. Where the Project may impact aquatic and riparian resources, CDFW recommends the County select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level, which may cause the watercourse to alter its course of flow.

3. Direct and Indirect Impacts on Biological Resources. The DPEIR should provide a thorough discussion of direct and indirect impacts expected to affect biological resources with specific measures to offset such impacts. The DPEIR should address the following:

a. A discussion of potential impacts from lighting, noise, temporary and permanent human activity, exotic species, and identification of any mitigation measures. A discussion regarding Project-related indirect impacts on biological resources. These include resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)).

b. A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted (CEQA Guidelines, § 15126.2(a)).

c. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the DPEIR.

d. A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts on habitat supported by the groundwater. Measures to mitigate such impacts should be included.

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11-9 cont.

e. An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DPEIR.

4. Nesting Birds. To avoid impacts to nesting birds, CDFW recommends that clearing of vegetation occur outside of the peak avian breeding season, which generally runs from February 1 through September 1 (as early as January 1 for some raptors). If Project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting breeding bird surveys should conduct a nesting bird survey within three days prior to work in the area. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. For the given Project site, CDFW generally recommends a 100-foot buffer from common avian species, 300 feet for listed or highly sensitive avian species, and 500 feet for raptors. The buffer should be delineated by temporary fencing and remain in effect as long as construction is occurring. No Project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the Project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

11-10

5. Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures (CEQA Guidelines, §§ 15002(a)(3), 15021). Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate impacts below a significant level under CEQA. Mitigation measures must be feasible, effective, implementable, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4).

a. The DPEIR should provide mitigation measures that are specific and detailed (i.e., responsible party, timing, specific actions, location) in order for a mitigation measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

b. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the DPEIR should include a discussion of the effects of proposed mitigation measures (CEQA Guidelines, § 15126.4(a)(1)). In that regard, the DPEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

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11-10 cont.

6. Compensatory Mitigation. The DPEIR should include compensatory mitigation measures for the Project's significant impacts (direct and/or through habitat modification) to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring.

7. Long-term Management of Mitigation Lands. For proposed mitigation lands, the DPEIR should include measures to protect the targeted habitat values in perpetuity. The mitigation should offset Project-induced qualitative and quantitative losses of biological resources. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.

8. Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. These efforts are experimental, and the outcome is unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.

9. Scientific Collecting Permit. A Scientific Collecting Permit would be necessary if there is a plan to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocated wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). A Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). For more information, please see CDFW's Scientific Collecting Permit webpage.[8]

[8] https://wildlife.ca.gov/Licensing/Scientific-Collecting

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11-11

10. Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies.[9] Through its Wetlands Resources policy, the Commission "…seek[s] to provide for the protection, preservation, restoration, enhancement, and expansion of wetland habitat in California" (California Fish and Game Commission, 2005). It is the policy of the Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."

    a. The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the DPEIR and these measures should compensate for the loss of function and value.

    b. The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

[9] https://fgc.ca.gov/About/Policies/Miscellaneous

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11-12

Agency Collaboration

In an effort to streamline the process of implementing licensing for cannabis cultivation in the County, CDFW recommends regular meetings between the County and CDFW regional staff to discuss permitting, enforcement, and compliance topics related to cannabis cultivation. In such meetings, agency priorities can be identified, important environmental issues addressed, site visits and enforcement efforts coordinated, and opportunities for grant funding discussed. CDFW looks forward to partnering with the County to minimize significant impacts to wildlife resources through collaboration and review of individual projects and mitigation that will follow under the Project.

Recommendation: CDFW requests the County include a mechanism that includes CDFW and other resource agency review and input on individual projects that come under the Project as early in the process as possible. This could occur as a part of reviewing each project and preparation and implementation of project-level habitat protection plans, wildlife protection plans, tree protection plans, or water use plans. Prior to the issuance of administrative or ministerial permits, the County should coordinate with CDFW regarding appropriate enforceable measures to address and mitigate for site-specific impacts to biological resources. Coordination should include review of individual written checklists, project specific site plans, biological assessments, habitat protection plans, wildlife protection plans, tree protection plans, and water use plans. Measures in these plans should be integrated into the County's land use entitlement and business licensing for projects to address site-specific conditions. This will allow cannabis operations to confidently move forward with State licensing under the DCC and ensure compliance with the FGC.

CDFW appreciates the opportunity to comment on the NOP for the Project. We look forward to receiving the DPEIR and working with the County in partnership to support the regulation of commercial cannabis businesses while protecting the fish and wildlife resources held in trust for all Californians. CDFW is available for consultation during all stages of the CEQA process, to share information related to fish and wildlife resources, and discuss potential impacts and proposed mitigation. If you have any questions regarding this letter, please contact Keith Yaeger, Senior Environmental Scientist (Specialist), at (562) 519-7144 or by email at Keith.Yaeger@wildlife.ca.gov.

Sincerely,

DocuSigned by:
5991E19EF8094C3...
Victoria Tang
Environmental Program Manager
South Coast Region

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ec: California Department of Fish and Wildlife
Victoria Tang
Randy Rodriguez
Jennifer Nguyen
Keith Yaeger

State Clearinghouse
State.Clearinghouse@opr.ca.gov

California State Water Resources Control Board
Brian Covellone, Brian.Covellone@waterboards.ca.gov

References

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Attachment A
Figures

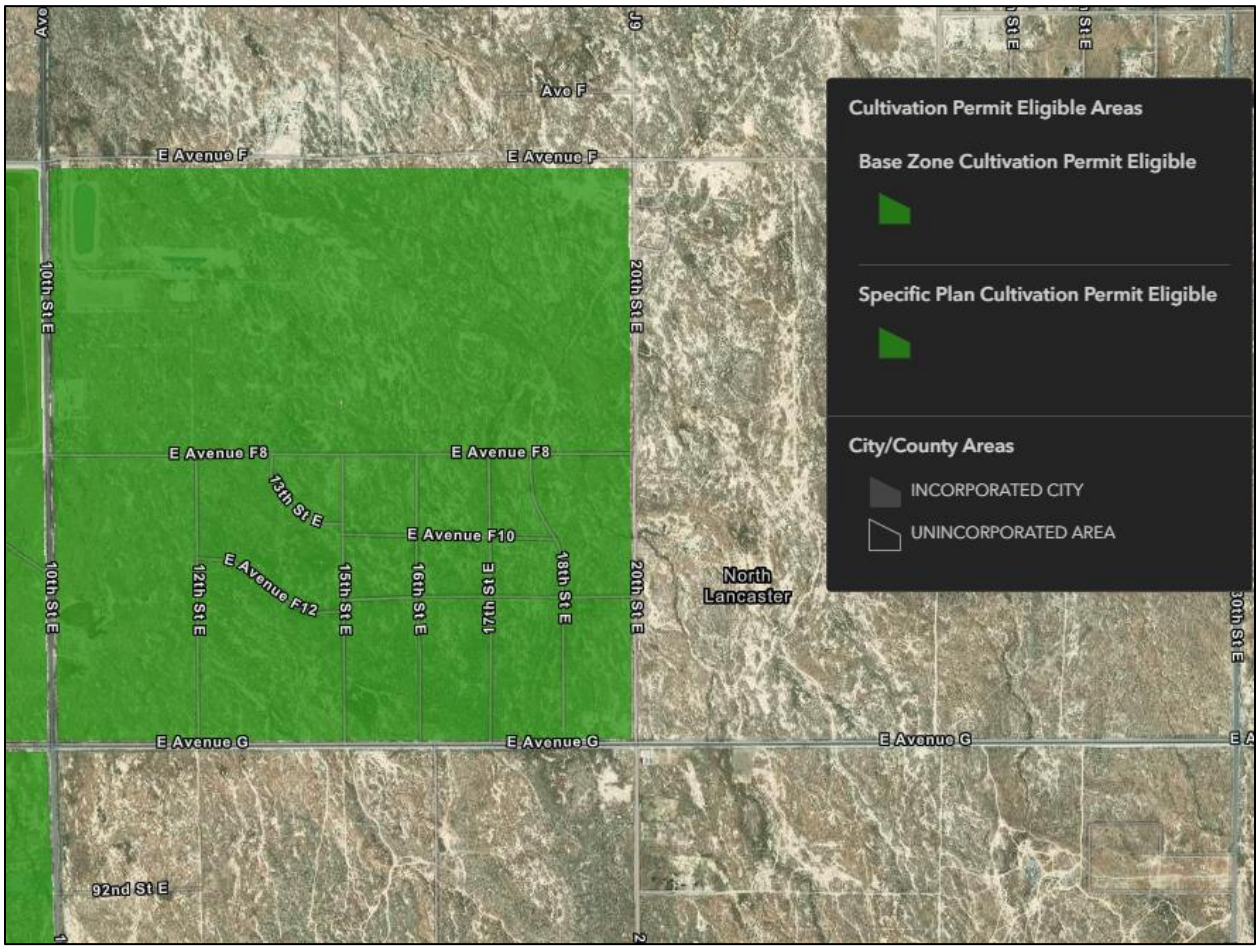


Figure 1. Example of undeveloped areas eligible for cannabis cultivation (approximately Latitude 34.742646, Longitude -118.099724; see County of Los Angeles Draft Cannabis Business Permit Zoning Eligibility Analysis).[10]

[10] https://amecei.maps.arcgis.com/apps/instant/basic/index.html?appid=2c7641e8c0e347049d2271789eb0525c

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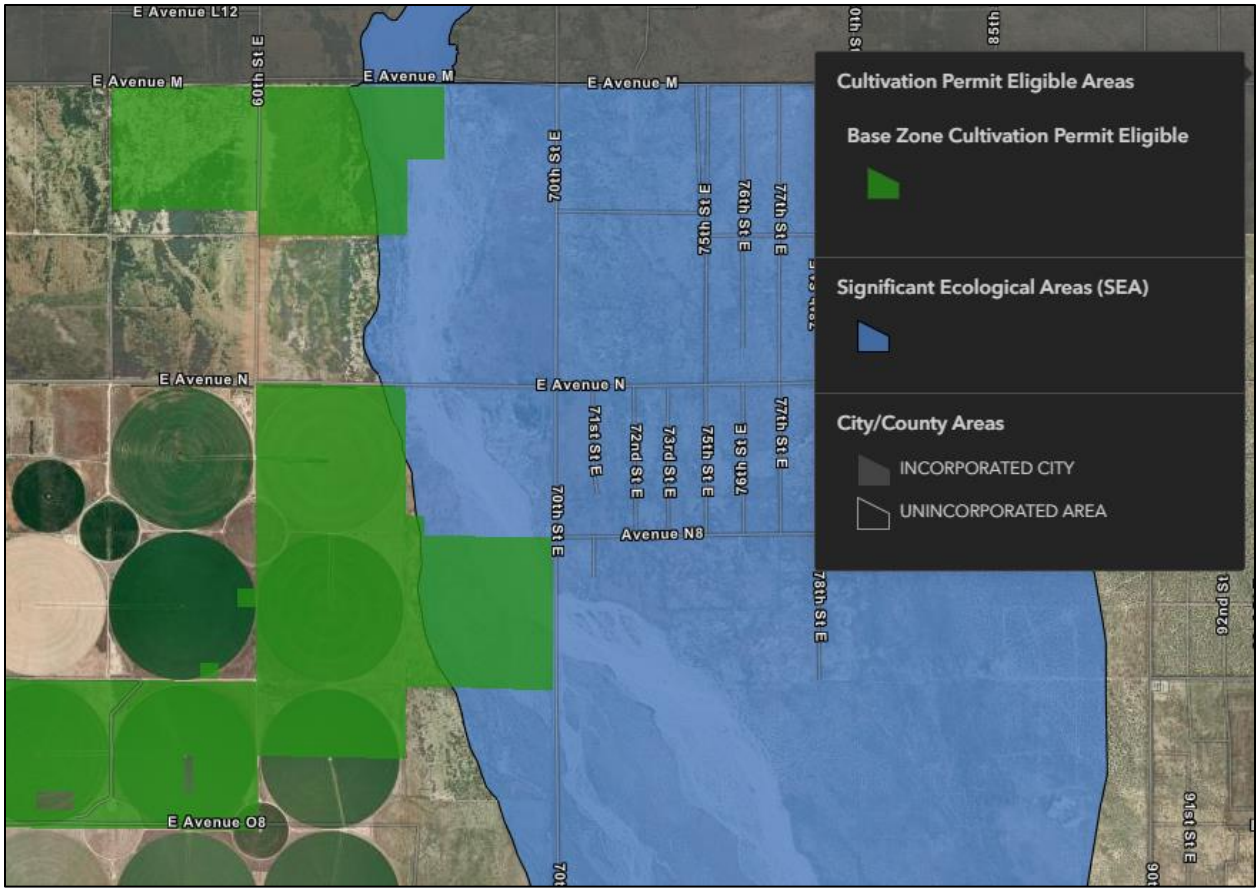


Figure 2. Example of areas within the designated Significant Ecological Area (SEA) that are eligible for cannabis cultivation (approximately Latitude 34.620178, Longitude -118.012484; see County of Los Angeles Draft Cannabis Business Permit Zoning Eligibility Analysis).[11] The eligible areas within the SEA also contain stream resources (Little Rock Wash and tributaries).

[11] https://amecei.maps.arcgis.com/apps/instant/basic/index.html?appid=2c7641e8c0e347049d2271789eb0525c

ACTON TOWN COUNCIL
P.O.Box 810, Acton CA 93510

April 4, 2025

Rafael Carbajal, Director
Department of Consumer and Business Affairs
County of Los Angeles
Office of Cannabis Management
320 W. Temple Street, Room G-10
Los Angeles, CA 90012.
Electronic transmission of thirty eight (38) pages to:
CannabisEIR@dcba.lacounty.gov

Subject: Acton Town Council Comments in response to the Notice of Preparation Issued by the County of Los Angeles for the Commercial Cannabis Business Licensing Program.

Dear Director Carbajal;

The Acton Town Council respectfully submits the following scoping comments in response to the Notice of Preparation (NOP) issued by the County of Los Angeles for the proposed Commercial Cannabis Business Licensing Program (Program). These comments are timely filed by the April 4, 2025 deadline set forth in the NOP.

12-1

The Acton Town Council understands that the County intends to issue a Program Environmental Impact Report (EIR) for the Cannabis Ordinance as required by the California Environmental Quality Act (CEQA); among other things, the EIR will address the environmental impacts arising from revisions to the Zoning Code (Title 22) and the Consumer Protection, Business, and Wage Regulation Code (Title 8). Pursuant thereto, the County has prepared an Initial Study which sets forth various conclusions regarding the current understanding of potentially significant impacts of the Project. The Acton Town Council has reviewed the Initial Study and we have some concerns. For instance, we note that the Initial Study underestimates significant environmental impacts in some very "community crucial" areas such as public safety and public services. Additionally, we are very concerned that the Ordinance and the conditions it imposes will not be properly implemented or enforced because the County has historically been ***very*** ineffective at implementing and enforcing its own regulations and its own adopted environmental impact mitigation measures.

12-1 cont.

Additionally, the Acton Town Council is quite surprised and very disappointed to note that the Los Angeles County Sheriff's Department was ***not*** invited to review and comment on the Initial Study before it was publicly released.[1] The Acton Town Council considers the Sheriff's Department (along with the Fire Department) to be the most critical public safety partners that our community has, and we note that the Ordinance poses a very real and significant public safety threat to our community for a number of reasons, not the least of which is that cannabis businesses are often protected with armed security guards, they are targets of opportunity for persons of malintent, and all of the properties where cannabis businesses will be established in our community are immediately adjacent to residential neighborhoods. Yet, and incredibly, the Sheriff's Department *was not even consulted* on the Initial Study (which perhaps explains why the Initial Study erroneously concludes that the Ordinance will have a "less than significant impact" on Sheriff services).

These and other concerns are discussed in more detail below; we ask that they be factored into the EIR that is prepared for the Ordinance.

PUBLIC SAFETY AND PUBLIC SERVICES.

Over the last 8 years, the Acton Town Council has provided extensive comments to DCBA regarding our concerns with the public safety risks and public service impacts posed by the establishment of a Cannabis Program in unincorporated Los Angeles County; we are incredibly disappointed to note that those concerns have all been completely ignored. In fact, they have been disregarded to such an extent that the Initial Study actually concludes that the Cannabis Ordinance poses ***no*** public safety risks and will have ***no*** effect on public services [see page 5].

In our prior comments (all of which are incorporated herein by reference), we have pointed out that rural communities in the Antelope Valley have negligible police presence because the local Los Angeles County Sheriff's Office is understaffed, overworked, and located many miles away. Deputy response times to emergency calls in rural Antelope Valley can be 45 minutes or more. This fact, coupled with the fact that all cannabis businesses (retail, cultivation, manufacturing, processing, etc.) are magnets for thieves (and worse) makes cannabis businesses a very real and significant source of crime[2]. For example, a study in Long Beach showed that violent crime increased within

[1] Page 4 states the "County Agencies" that reviewed the Initial Study were Public Works, Fire Department, Sanitation District, Public Health/Environmental Health, Department of Parks and Recreation, and Department of Regional Plannings but the Sheriff Department was explicitly omitted and not invited to participate.

[2] Crimes reported at Cannabis businesses rose sharply in 2023. [https://xtown.la/2023/10/10/crimes-at-los-angeles-cannabis-shops-increase-in-2023/]

12-1 cont.

one square mile of a Cannabis Dispensary from 1.5% to 4.8%.[3] It is noted that NIH offers recommendations to address these problems; however, NIH's recommendations will not work in Acton[4]. Accordingly, it is axiomatic that the Ordinance will affect public services because the significant number of cannabis businesses it authorizes (90 + microbusinesses) will naturally result in more crime (and thus more public services) within the communities in which they are located. Moreover, communities like Acton that are traversed by a freeway and four major highways (Angeles Forest Highway, Sierra Highway, Soledad Canyon, and Escondido Highway) provide easy and convenient getaway opportunities for criminals (and it a key reason why crime in Acton has recently increased[5]) All of this must be addressed in the EIR.

The Acton Town Council has also pointed out that cannabis businesses are always protected with armed security guards (and often concertina wire and guard dogs) and that such businesses are *intrinsically incompatible* with the residential neighborhoods that are immediately adjacent to where DCBA proposes to locate such businesses in Acton[6]. Worse yet, these businesses threaten the lives of nearby residences. This is not a hypothetical, it is a fact.[7] "Shots fired" at cannabis businesses are an ***expected outcome*** of the Cannabis Ordinance[8] and thus constitute environmental impacts that exist solely because of the nature of cannabis businesses; accordingly, they must be taken into consideration in the EIR. Among other things, the EIR must address the risks of errant bullets hitting homes (and residents), criminals taking refuge in adjacent residences, and attacks on residents by escaped guard dogs. It must also provide

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[3] https://pmc.ncbi.nlm.nih.gov/articles/PMC4861677/

[4] NIH discusses measures such as business include managers on location, systems that can monitor activity, informal social control (friends and neighbors) and "formal authorities" (which presumably means police presence). https://pmc.ncbi.nlm.nih.gov/articles/PMC3364319/ . These strategies will not work in Acton. We have no substantive police presence and having a "manager" on site does not deter a determined thief. Having a "system that can monitor" the business is similarly useless because there are no emergency responders nearby to interdict the drug theft; therefore, the monitors will just record the theft and that is it. Finally, the County should ***NEVER*** presume that an Acton resident who lives next door to a cannabis business should have ***ANY*** responsibility to impose "an informal social control" on a gun wielding criminal.

[5] Shea Sanna, a deputy district attorney who lives in the Santa Clarita Valley and previously worked at the DA's office in Santa Clarita, said part of the challenge has been an increase in the volume of criminals coming off the freeways from the north and stopping along the way to look for opportunities to break into businesses as they head south toward urban Los Angeles.

[6] According to the DCBA map, huge areas of Acton are designated for every type of cannabis business (cultivation, processing, packaging, manufacturing, testing, distribution, retail, delivery, microbusiness). https://amecei.maps.arcgis.com/apps/instant/basic/index.html?appid=2c7641e8c0e347049d2271789eb0525c

[7] Just a month ago, a man was shot to death by an armed guard at a cannabis dispensary in Los Angeles. https://www.cbsnews.com/losangeles/news/west-la-marijuana-dispensary-security-guard-shoots-and-kills-possible-burglary-suspect/

[8] In September, a security guard was shot to death at a cannabis business in East Los Angeles. https://boyleheightsbeat.com/east-la-shooting-security-gaurd-memorial/

12-1 cont.

mitigation measures for these significant impacts. Notably, a high solid block wall will not reduce these safety concerns because both the criminals and the security guards can (and will) continue using their firearms outside of any walled enclosure. When this was pointed out in 2017, a County Staff member (who will remain nameless) commented that this concern could be addressed by simply prohibiting the carrying of weapons outside of any cannabis business; in response, the Acton Town Council asked how the County would get the criminals to comply with this restriction. There was no answer.

We also remind DCBA that solvent extraction operations are dangerous and prone to explosion and deflagration; even the Cannabis Industry itself recognizes these risks[9] which ***are not*** mitigated by mere compliance with adopted fire protection standards *because explosions still occur in compliant facilities*. For example, a licensed cannabis extraction operation blew up less than three months ago; the deflagration occurred in an extraction booth where propane and butane were used.[10] Fortunately, the explosion occurred in Maryland (not a fire hazard area) and the fire was contained. Rural communities in VHFHSZs like Acton will not be so fortunate when a cannabis extraction operation explodes because local winds (which blow constantly especially during "Santa Ana" conditions) and dry brush will transform the deflagration into a conflagration. All of this must be addressed in the EIR, and in particular, the EIR must address specific and unique circumstances in remote rural communities in VHFHSZs like Acton.

12-2

THE COUNTY IS BARRED BY CEQA FROM RELYING ON A PROGRAM EIR TO ADOPT THE CANNABIS ORDINANCE.

The CEQA Guidelines state that later activities in a program that is approved pursuant to a Program EIR "must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared" [Cal. Code Regs. tit. 14, § 151689(c)]. Notably, the "later activities" that will result from the Cannabis Program will never be "examined" for additional impacts because they are all ministerial actions which are permitted either outright or via a ministerial site plan review;[11] as such, they will proceed without regard for environmental impacts or whether an additional environmental document must be prepared. In the context of the Public Resources Code and the California Code of Regulations, the term "must" connotes a

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[9] Frontier Risk Insurance Services writes insurance policies for cannabis businesses and it expressly states that "Cannabis extraction involves flammable materials and pressurized systems, increasing the risk of fires or explosions" [https://www.frontierrisk.com/verticals/cannabis-extraction]

[10] https://apnews.com/article/explosion-cannabis-extraction-facility-stevensville-maryland-ea870b7198c2f7cf3c3e95721b589a64

[11] According to the draft Zoning Ordinance posted on the DCBA website, all cannabis uses authorized by the Ordinance will be ministerially approved. https://dcba.lacounty.gov/wp-content/uploads/2024/07/Draft-Title-22-Cannabis-Ordinance-Combined_Revisions_070824.pdf

12-2 cont.

mandatory action/requirement; therefore, a Program EIR can only be utilized for projects that involve at least some level of subsequent discretionary review. Because the Cannabis Ordinance authorizes only ministerial approvals that do not involve subsequent environmental review, it cannot be approved via a Program EIR. Things would be different if at least some of the "later activities" resulting from the Cannabis Ordinance were subject to a conditional use permit (CUP) or some other discretionary review because such activities require an examination regarding whether "an additional environmental document must be prepared". It would also be appropriate to require a CUP for certain cannabis uses such as cultivation (which always causes significant air quality problems) and solvent extraction operations (which always pose exceedingly high public safety risks particularly in very high fire hazard severity zones). Because the Cannabis Program will result in only ministerial actions that never involve further examinations of environmental effects, it is not eligible for approval via a Program EIR. Furthermore, the environmental document that is prepared for the Cannabis Program must consider the significant impacts that will result in each that is targeted for Cannabis development. For rural VHFHSZ areas like Acton, impacts pertaining to wildfire risks, public safety risks (resulting from the lengthy Sheriff response time that rural areas experience), water resource impacts (due to minimal water resources), and air quality risk (from the horrendous odors that will result when the County fails to enforce its own odor control requirements) must be addressed in detail.

12-3

12-4

SENSITIVE USES AND BUFFERS

The Initial Study properly acknowledges that the project may pose significant air quality impacts to sensitive receptors; this is particularly true for cannabis cultivation, manufacturing, and warehousing because the stench from such uses can be overwhelming and revolting. Page 26 specifically cites a publication by the South Coast Air Quality Management District (SCAQMD)[12] which identifies the following as sensitive receptors who are particularly affected by air quality insults: residences, schools, playgrounds and childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, hospitals, and retirement homes. Although the Initial Study cites an AQMD resource which identifies these as "sensitive", the Initial Study itself does not even acknowledge these as "sensitive" uses that warrant special consideration. In fact, among the "sensitive" categories identified by the SCAQMD, the Initial Study only recognizes two: 1) schools, and 2) playgrounds and childcare centers [page 17]; others are apparently ***not*** sensitive. The Acton Town Council observes that

[12] 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%20exposure%20to%20an%20air%20contaminant

12-4 cont.

this is utterly contrary to the adopted County Code which expressly defines "sensitive use" as "A land use where individuals are most likely to reside or spend time, including ***dwelling units***, schools and school yards" (emphasis added).

The Ordinance (and its buffers) described in the Initial Study are also inconsistent with the County General Plan (and in particular, the Land Use Element) which recognizes that "a residential use could be impacted by noise, traffic and odor from adjacent commercial or heavy industrial uses" [page 63]. Notably, the General Plan presumes that residential uses would only be affected by *heavy* industrial uses, not *light* industrial uses; this makes sense because light industrial uses are *not supposed to involve processes that generate significant noise or odor*. Unfortunately, the Ordinance described in the Initial Study ignores all of this because it authorizes *all* cannabis operations (including cultivation, extraction, manufacturing and warehousing) of *unlimited* size and scope in *light* industrial zones regardless of their impacts or whether they are adjacent to residential or other "incompatible" uses. Equally important, this excerpt from the General Plan clearly establishes that *industrial uses which generate noise or odor are intrinsically incompatible with residential uses*. Accordingly, the Cannabis Ordinance as proposed is not consistent with the General Plan and in particular it controverts Land Use Policy LU 7.1 which directs the implementation of buffers and other protections to mitigate incompatible uses. The EIR must incorporate a 600 foot residential buffer for all industrial cannabis operations (cultivation, manufacturing, warehousing, and processing) to ensure the Cannabis Ordinance is consistent with the County General Plan.

The buffers discussed in the Initial Study are also inconsistent with the directive that the Board of Supervisors issued in the Cannabis motion adopted February 15, 2022. For example, Supervisor Solis clearly expressed that the Ordinance would "align zoning codes with state law in county's alcohol outlet zoning ordinances, to create a 600-feet buffer for all sensitive uses"[13]. However, the ordinance described in the Initial Study ***does not*** align these parameters: it *does not* align with the zoning code (which defines "sensitive use" to include residences) and it *does not* align with the county's alcohol ordinance (which requires all liquor business to obtain a Conditional Use Permit). Furthermore, the Ordinance described in the Zoning Code does not identify provisions that will accommodate the amendments to the motion that were made by Supervisor Mitchell when she directed the Ordinance to "include necessary provisions" that will "prevent the oversaturation of operators, either by type of license or number of total licenses among supervisorial 3 districts ***and our local communities"*** (emphasis

[13] Page 173 at 24-25 of the Board Transcript [https://file.lacounty.gov/SDSInter/bos/sop/transcripts/1119895_021522.pdf].

12-4 cont.

added)[14]. The Ordinance described by the Initial Study does not include ***any*** provisions that limit the number of licenses in a community; it only limits the number of licenses within a Supervisory District. This concern is compounded by the fact that there is no limit to the number of cannabis microbusinesses that will be permitted (as discussed in more detail below) which means that a single community could become substantially overburdened by cannabis businesses.

The high potential for overconcentration and impacts associated with overconcentration (odor, public safety, water use, etc.) on communities like Acton that have many large industrially zoned parcels immediately adjacent to residential neighborhoods cannot be understated and must be fully addressed in the EIR. Furthermore, and to ensure that impacts from Cannabis businesses are indeed reduced to a level that is "less than significant", the EIR must establish mitigation measures that include mandatory license revocation procedures when cannabis businesses fail to conform with mitigation measures adopted in the EIR or conditions (such as odor control conditions) that are imposed on the licenses.

12-5

CLARITY REGARDING "NEW DEVELOPMENT" AND "EXISTING BUILDING" MUST BE PROVIDED

The Initial Study states that the Ordinance limits cannabis businesses to "existing buildings", that it will "not permit the development of new buildings or the redevelopment of existing buildings to accommodate a proposed cannabis business" (page 11) and that it "would not result in new development" (page 19). However, page 39 refers to "new development associated with cannabis operations" and page 49 refers to "new development that is proposed to facilitate commercial cannabis activities". These statements are inconsistent and clarification is required.

Additionally, the Acton Town Council has substantial concerns with the vagueness that is implicit in the term "existing building"; the matter is quite important because the Initial Study considers many impacts (land use, aesthetics, biological resources, etc.) to be "less then significant" because the ordinance only allows cannabis businesses in "existing buildings". However, and as we pointed out to DCBA in 2024, it is a common practice of developers in Acton to make commitments to our community that a certain type of use/building will be developed in order to garner community support and then once the project is approved, the developer moves forward with an entirely different use. Using this practice of "bait and switch", it is a ***certainty*** that a cannabis developer will

[14] Page 181 at 10-17 of the Board Transcript [https://file.lacounty.gov/SDSInter/bos/sop/transcripts/1119895_021522.pdf].

12-5 cont.

come to our community, propose a "feed store" or "lumber store" or some other "community serving" business, construct the building, and then abandon the use that was originally proposed and apply to DCBA for a cannabis license; DCBA would then grant the license because the building is technically "existing". With this tactic, a cannabis developer will be able to "bootstrap" a *purpose built cannabis building* that precisely meets all desired cannabis specifications under the guise of some proposed "community serving" use that is abandoned the instant construction is completed. Such circumstances constitute "new development" that is driven solely by the Cannabis Ordinance and which *will* result in significant impacts including aesthetic, biological resource, water use, land use, etc.

The Acton Town Council notes that CEQA requires EIRs to establish "baseline" conditions against which project impacts are assessed; we also note that the Initial Study presumes that many impacts will be avoided because no new buildings will be constructed as a result of the Ordinance. However, for this to be true, then the building profile that will exist when full "buildout" of the Cannabis Program is achieved must be ***identical*** to the "baseline" building profile that currently exists now (i.e. at the time the EIR is developed). The only way to create this circumstance and thereby ***ensure*** that impacts really will be "less than significant" because new buildings will not be constructed is to incorporate restrictions in the EIR that deliver these circumstances. Specifically, the EIR must include restrictions to ensure that cannabis business will only be developed in legally established buildings that existed *at the time the EIR baseline was established* (namely, the date that the Draft EIR is released). Without such restrictions, the County will be barred from finding that an impact is "less than significant" simply because the Ordinance assumes future cannabis businesses will only operate in "existing buildings".

12-6

THERE ARE NUMEROUS ERRORS IN THE COMMERCIAL CANNABIS ELIGIBLE AREAS MAP

The Acton Town Council has reviewed the "Commercial Cannabis Eligible Areas Map" posted with the Initial Study and we note several errors pertaining to our community. For example, The map identifies the entirety of APNs 3056-004-055, 3056-004-044, and 3056-004-060 as eligible for all cannabis businesses. This is incorrect. Much of APN 3056-004-055 is zoned "Rural Commercial" and much of 3056-004-044, and 3056-004-060 are zoned agricultural; therefore, large areas that the map identifies are actually ineligible for cannabis development. The map also fails to recognize that APN 3208-019-900 and APN 3208-019-901 are used for-after school child care and recreation programs and are owned by the local school district; they are also used extensively for youth-oriented activities (soccer and other sports) on weekends.

12-6 cont.

Accordingly, the map erroneously shows that industrially zoned property within 600 feet of these parcels is available for cannabis business development (specifically all the properties along Syracuse and north of Gillespie).

The map fails to recognize that APN 3208-11-052 has been approved for a church and school; much of the construction has already been completed. Therefore, the map erroneously shows that industrially zoned property within 600 feet of these parcels is available for cannabis business development when it is not (specifically APN Nos. 3208-011-055 and APN 3208-011-068). The map fails to recognize that there is a community clubhouse which routinely hosts "Youth Oriented Uses" (such as cub scout meetings) and there are also two community recreational equestrian arenas that also serve as important "Youth Oriented Uses"; these existing uses are located on APN 3208-024-024, APN 3208-024-025, and APN 3056-004-059. Therefore, no cannabis businesses can be located anywhere within 600 feet of the boundaries of these parcels.

12-7

THE EIR MUST PROPERLY ACCOUNT FOR THE IMPACTS THAT WILL RESULT FROM THE UNLIMITED NUMBER OF CANNABIS BUSINESSES THAT ARE AUTHORIZED BY THE ORDINANCE

In prior workshops regarding the Cannabis Ordinance, County staff have stated that, while the number of Cannabis businesses to be licensed in each Supervisory District will be limited, there will be no restrictions on the number of microbusinesses that will be approved. The term "microbusiness" is a misnomer because "microbusinesses" have no size limits and are likely to be much larger than non-microbusiness cannabis facilities because they will include multiple cannabis operations. Apparently, the only limit that the ordinance places on microbusinesses is that they cannot have more than 10,000 square feet devoted to growing cannabis (which is actually a very large area - nearly a quarter of an acre); otherwise, there are no restrictions on the size, scope, or extent of any microbusiness. It is noted that the Initial Study claims that each license issued to a microbusiness would "draw from the remaining available licenses for each business type" (page 15) which would suggest that microbusinesses are in fact limited. However, this statement in the Initial Study is inconsistent with the information conveyed to the Community of Acton during multiple workshops hosted by DCBA. Furthermore, if microbusinesses will "draw" from the same license pool as all the other cannabis businesses, then it seems that cannabis businesses will not be evenly distributed among the Supervisory Districts and will likely accumulate in areas like Acton that have large amounts of industrially zoned land. Accordingly, the EIR should assume that the community of Acton will have multiple cannabis businesses and it must address the significant impacts that these businesses will have on the community, including, but not limited to, public safety, water availability, aesthetics, odor, etc.

12-7 cont.

Finally, the Acton Town Council notes that there are almost ***no*** areas identified for cannabis businesses in Supervisory District 3 and comparatively few areas in District 4; this means that few cannabis businesses will be developed in District 4 and even fewer in District 3. It also means that Districts 1, 2, and 5 will have *far more* cannabis businesses than Districts 3 and 4. Accordingly, the "even distribution" of cannabis licenses described in the Initial Study and envisioned by the Board will only occur if the EIR implements a mitigation measure that requires licenses to be issued at the same rate across each Supervisory District; this will ensure that no Supervisory District has more cannabis businesses than any other District at any given time.

THE INITIAL STUDY DOES NOT ADDRESS THE "GOOD NEIGHBOR POLICY & CORPORATE SOCIAL RESPONSIBILITY" COMPONENT OF THE CANNABIS PROGRAM

DCBA has stated that the Cannabis Program will include a "Good Neighbor Policy & Corporate Social Responsibility" component that will require cannabis business owners to convene a noticed community meeting and report on concerns that the community expresses; it is certain that any such concerns expressed by the neighborhood would pertain to potential environmental impacts. However, the Initial Study suggests that ***none*** of this community input will inform the issuance of any cannabis licenses or affect whether cannabis licenses are issued because it ***all*** cannabis permits will be issued ministerially "by right"; accordingly, the business owner will be under no obligation to respond to or care about any community concerns that are expressed at any community meeting. Despite this, DCBA must still believe that public concerns will be factored into the cannabis licensing process (otherwise community outreach is meaningless). Accordingly, the EIR must articulate how the environmental impact concerns identified by community members during meetings required by "Good Neighbor Policy & Corporate Social Responsibility" provisions will be factored into each ministerial permit *before* it is issued.

THE EIR MUST RECOGNIZE THAT MITIGATION MEASURES WHICH ARE EXPECTED TO REDUCE ENVIRONMENTAL IMPACTS BECAUSE THEY WILL BE IMPLEMENTED AND/OR ENFORCED BY THE COUNTY WILL BE INEFFECTIVE AND NOT REDUCE THE IMPACTS THEY ARE INTENDED TO MITIGATE.

The Initial Study suggests that the EIR will presume that a number of environmental impacts will be reduced to a level that is "less than significant" because the County will implement measures to mitigate these impacts. For example, page 27 states that the Ordinance is not expected to expose people to odors because the County will require the

business owner to submit an "Odor Management Plan". Of course, this mitigation measure depends entirely on the Cannabis Business owner complying with the "Odor Management Plan" AND the County enforcing the "Odor Management Plan" when the business owner backslides. History shows that neither of these outcomes are likely in the Community of Acton because 1) No industrial uses in Acton actually comply with either the County Code or their own permits; and 2) The County does not compel these uses to comply with their permits and it does not enforce the County Code. Examples are provided below.

County EIRs habitually include mitigation measures that require conformance with development standards and operating conditions; the County relies on these measures to either avoid the preparation of an Environmental Impact Report (because they are alleged to reduce all impacts to a level that is "less than significant") or to certify an EIR and adopt a "Statement of Overriding Considerations" that declares all significant impacts are reduced to the greatest extent feasible. The problem is, the County ***DOES NOT*** implement these mitigation measures after they are adopted; because of this, significant impacts ***ARE NOT*** mitigated. Therefore, the construction and operation impacts of County-approved projects ***are not*** mitigated in the manner stated by the associated CEQA document because County departments ***ignore*** the conditions and mitigation measures that are adopted by the CEQA document.

Take for instance the mitigation measures that the County adopted to reduce the aesthetic impacts of the industrial, utility-scale "Silverado West" Solar project; according to Page 2 of the adopted "Mitigation Monitoring and Reporting Program" (MMRP), the development would have a "10-foot wide screening vegetation buffer" to visually screen the project from area residents and from roadways. The county approved the project, issued permits, and the project was built without vegetation screening. Figure 1 shows a photograph taken of the solar farm from 90th Street West (a major thoroughfare in the Antelope Valley) and just north of Avenue J; it is plainly obvious that the project has no vegetation screening and that surrounding residents and travelers on the roadway are subjected to the industrial blight created by the project. This project has resulted in significant aesthetic impacts *because the EIR failed to address the undeniable fact that the County* ***would not*** *implement the mitigation measures adopted therein*. Incidentally, there are tens of thousands of acres of solar farms in the Antelope Valley and they are all supposed to have "vegetation screening" but ***none of them*** do.

The Acton Town Council has every reason to believe that the County will implement the Cannabis Ordinance in the same irresponsible and reckless manner that it implements all other projects: namely, the County will not enforce any conditions or mitigation measures adopted by the EIR. And, if the County does act to enforce a mitigation

12-7 cont.

Figure 1. View of Silverado Phase 4 from 90th Street west just north of Avenue J. Note the conspicuous lack of vegetation screening.



measure, it will be a token effort that is intended to *appear* as though the County is doing something; these efforts will be superficial and meaningless. Moreover, it is known with certainty that the County will ***never*** rescind or revoke any license for any cannabis facility no matter how extensive or serious the violations are at the facility and regardless of the significant impacts that the facility creates on the community in general and on surrounding properties in particular. This certainty is borne from decades of our own observations of County activities in the Community of Acton. For example, the County issued a CUP authorizing the continued operation of a recreational vehicle park (RV Park) in Acton that is supposed to only operate during the summer months but which actually operates all year long with the full knowledge of Planning staff. Another massive RV park in Acton has been unlawfully operating for nearly 20 years without a Conditional Use Permit (the most recent CUP expired in 2006); this RV park also differs substantially from the RV Park described in the EIR that was certified more than 40 years ago. Worse yet, the County's failure to enforce critical mitigation measures that were established by the EIR to protect biological resources *resulted in* ***the extirpation*** *of at least one endangered species in Acton*[15] Yet, the County continues to allows this RV Park to continue operating with impunity! As another example, every one of the 25+ billboards in Acton have either been unlawfully erected in violation of the County Code or unlawfully modified in violation of the Acton Community Standards District; again, the County does nothing.

The County's inability to enforce permit conditions and mitigation measures and code provisions is not limited to just RV Parks and solar farms and billboards; the following

[15] The land on which the RV Park is located had a thriving population of unarmored threespine stickleback at the time the RV Park was approved and the EIR required the RV Park to protect this precious biological resource. However, within a year after the RV Park was approved, the stickleback were gone. The County never monitored the Stickleback population and it did nothing to enforce its own EIR conditions. In fact, the County was completely unaware of the situation until the Acton Town Council notified County staff about it several years ago. Since that time, and insofar as we are aware, nothing has been done.

12-7

pages provide photographs of other uses in Acton that constitute ongoing violations of either the County Code or approved permits or both. These uses include illegal outdoor storage uses, illegal recreational vehicle parks, impermissible industrial uses on agricultural and rural commercial zones, violations of approved site plans, etc. Some of these uses have permits (which means the County does not require compliance after permit issuance) and some have no permits (which means the County does not successfully enforce its own code). Each photograph depicts a different property; there are not multiple photographs of the same location. Moreover, these photographs merely capture uses that are visible from major and secondary highways in Acton; there are ***many many*** more such uses in the more remote areas of the community.

These facts indisputably establish that the County has adopted a "Pattern or Practice" of failing to enforce mitigation measures, operating conditions, and ordinance provisions. These facts also constitute substantial evidence that any mitigation measure which is adopted by the EIR and founded on the premise that it will be enforced by the County will in fact be wholly ineffective and ***will not*** materially reduce ***any*** impacts. Accordingly, a critical scoping comment offered by the Acton Town Council is that the EIR prepared for the Cannabis Ordinance must presume that any mitigation measure which is reliant on the County for its implementation or enforcement will have no effect and will not mitigate any impacts.

The Acton Town Council respectfully requests that all of the comments provided herein are incorporated into both the Cannabis Ordinance as well as the environmental document that is certified pursuant to the Cannabis Ordinance.

Sincerely;

Jeremiah Owen, President
The Acton Town Council



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430(B)



Violates 22.140.430 (C)



Violates 22.140.430 (B)



Violates 22.140.450



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Illegal Commercial Outdoor Storage in an Agricultural Zone.



Violates 22.140.430 (C)


Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Illegal Commercial Storage in an Agricultural Zone,)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Illegal Commercial Outdoor Storage in a Residential Zone.



Violates 22.140.430 (C)



Illegal Commercial Outdoor Storage in a Residential Zone and Possibly an Unlicensed RV Park.



Violates 22.140.430 (C)



Unpermitted Commercial RV Park


Unpermitted Commercial RV Park



Violates 22.140.430 (Either B or C; it is not clear if this is an outdoor storage facility or a commercial business with accessory storage. Either way, it violates 22.140.430.



Violates 22.140.430 (C)



Unpermitted Commercial RV Park



Illegal Commercial Outdoor Storage Business in a Residential Zone.



Illegal Commercial Outdoor Storage Business in a Residential Zone.


Unpermitted RV Park.



Unpermitted RV Park



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Violates 22.140.430 (C)



Illegal Commercial Outdoor Storage Use in an Agricultural Zone.



Violates 22.140.430 (C)



Illegal Commercial Outdoor Storage Use in an Agricultural Zone.



Illegal Commercial Outdoor Storage Use in a Rural Commercial Zone.



Unlicensed RV Park



Illegal Commercial Outdoor Storage Use in a Rural Commercial Zone.



Illegal Commercial Outdoor Storage Use in a Rural Commercial Zone.



Illegal Commercial Outdoor Storage Use in an Agricultural Zone.



Illegal Commercial Outdoor Storage Use in an Agricultural Zone and Possibly an Unlicensed RV Park.



Violates 22.140.430 (C)

Submission Date	First Name	Last Name	Email	Which LA County Supervisorial District do you live in?	Comment(s)	
Mar 5, 2025	Cynthia	LuVisi		Incorporated City- LA County	I think district 17 It is not appropriate for people to have to smell MJ while driving to work. The cannabis warehouse should not be allowed to be near freeways homes neighborhoods anything like that should have to be off in the desert area not in downtown or in town LA. It has to be so many hundreds of yards miles away from the city. Sometimes I almost feel like when I'm driving the freeway they have the fan on to blow the smell over to the freeway, which is inappropriate. 2 it should only be prescribed by doctors who are real physicians and should not be sold until they are 28 years of age or older to avoid any dormant mental disease, diseases and medical diseases that can cause it to react to the taint marijuana instead of it being natural grown and because of that it is stronger than the normal stuff that was smoke back in the days and that's why I was voted on now they are making it to where it's causing a psychosis and problems for society and ruining our air that we breathe in just like secondhand smoke	13-1
Mar 5, 2025	Lisa	Maioli	lisamaioli4872@gmail.com	Incorporated City- LA County	Concerned.	14-1
Mar 18, 2025	Teri	Malkin	dtmalkin@yahoo.com	1st District Unincorporated Area	1. It's near RUSD transit hub where parents get bus permits for their kids. 2. Might clog further limited North/South and East/West streets(Nogales/Walnut Drive) 3. Heavy smog area. Don't need further pollution. 4. Hotel nearby being built. Kids stay there. 5. Proximity to shopping center (kids shop with parents)	15-1
Mar 18, 2025	L	B	cl5309@yahoo.com	Decline to state	Why are government employees paid for by taxpayers considering any action on schedule 1 (eg federally banned) substances other than to cease all sales immediately?	16-1
Mar 27, 2025	Heidi J.	Swan	heidiaswan@yahoo.com	Incorporated City- LA County	California is a drought state, we should be using our natural resources for growing food. https://www.washingtonpost.com/news/wonk/wp/2015/06/26/forget-almonds-look-at-how-much-water-californias-pot-growers-use/ "The carbon footprint is surprisingly high" https://ideas.ted.com/whats-the-carbon-footprint-of-cannabis-surprisingly-high/ "...greenhouse gas emissions from cannabis production are largely attributed to electricity production and natural gas consumption from indoor environmental controls, high-intensity grow lights, and supplies of carbon dioxide for accelerated plant growth." https://engr.source.colostate.edu/insatiable-demand-for-cannabis-has-created-a-giant-carbon-footprint/ My suggestion is to cut way back.	17-1
Mar 28, 2025	Scott	Mayers	sscottmayetsphd@gmail.com	3rd District Unincorporated Area	Quite frankly the management of this cottage industry that you have evidenced thus far stinks. Maybe you can get someone who knows how to run a business instead of filling it with lame ducks	18-1
Mar 28, 2025	Yoanna	Acosta	yobisrod85@gmail.com	2nd District Unincorporated Area	These studies focus so much on licensed operating practices but what about the illegal operated cannabis businesses? I literally have one next to my house and I have seen sheriffs there, but they haven’t done anything to stop that.	19-1

Mar 29, 2025	DAN	Perez	dperezgis@yahoo.com	5th District Unincorporated Area	We are a provide security guards to licensed cana shops in Santa Ana. When they conduct annual audit and inspection on their cana shops. They request our state license, city permit, insurance and all guards permits, making sure all docs are current. It assures that the shops are meeting State and City security requirements. It prevents illegal guard companies from avoiding paying State and city taxes and lawsuits with no insurance coverage for public (general liability) and for the employees (workers comp).	20-1
Mar 31, 2025	Sandra	Tamayo	stamayo24@gmail.com	2nd District Unincorporated Area	These cannabis retailers have caused traffic accidents and speeding in my community. There is no parking on the streets and people double park their vehicles on the street to buy their marijuana. It has attracted unsavory people to this community who purchase from these retailers. There are families with young children who live here and it's such an eye sore for the Florence Firestone community. I understand it is legal in California but retailers should be moved to main streets away from residential areas.	21-1
Mar 31, 2025	Ruth	Brock	actontakesaction@att.net	5th District Unincorporated Area	Please state clearly that commercial cannabis enterprise will not be allowed in C-RU zoning. Please stipulate how long a building/structure must be in existence to qualify as "pre-existing building" when an individual is applying for a permit on M-1 for commercial cannabis enterprise. If a property owner builds a structure in 2025 and this building has no prior use history, can this property owner apply for a permit in 2026 and qualify as having a "pre-existing building"? It would seem if there was no prior use history that this new structure was obviously built to be utilized for cannabis business. How will this eligibility be determined?	22-1
Mar 31, 2025	Miriel	Bereal	MirielB@icloud.com	Decline to state	First, i do give all glory, honor and praise to THE MOST HIGH GOD… as without HIM, this comment would not be. Second, my name is Miriel BeReal, and i am/was a Resident of Altadena, looking to erect a Social Equity Medicinal Cannabis Seed-to-Sale facility within The City. Though now… the City is, different. Within the devastating events that took place, not only was our home and belongings consumed by fire, the idea of opening a cannabis facility within The City went up in smoke too. Yet on today… GOD has shown me that beauty can come from ashes. That a cannabis facility there can still be possible… though we would need all of the help we can get, to rebuild. Including grants (lots of funding), with environmental help to clear toxic soil and rebuild with more eco friendly, fire resistant ways. Minimizing our carbon footprint, while simultaneously helping the community. I do ask that the 'rules' be in favor of incorporating unconventional ways to build a first ever City & State cannabis licensed facility in Altadena.	23-1
Mar 31, 2025	Gabriel	Avilez	Gabrielavilez79@gmail.com	5th District Unincorporated Area	I believe it is unjust that Los Angeles County restricts cannabis cultivation licenses to specific parcels of land owned by a select group of individuals. This practice raises serious questions about fairness and transparency, as it appears to favor certain landowners through what could be perceived as a pay-to-play system. As a property owner, I should have the equal right to utilize my land for cannabis cultivation, particularly on parcels zoned A-2 for agricultural use. Denying other property owners the same opportunity undermines equitable access to economic opportunities. Furthermore, Los Angeles County's current approach to cannabis production often results in indoor-grown products laden with pesticides and chemicals, which compromises consumer health. The absence of organic cannabis options in the county suggests a systemic issue, potentially driven by entrenched interests that limit market entry for new growers. A truly free and competitive market would allow broader participation by issuing licenses to all qualified applicants, encouraging cultivation in rural areas rather than concentrating it in urban centers. This would not only promote economic fairness but also address concerns about crime and overdevelopment in densely populated regions. Restricting access to licenses does a disservice to communities seeking to engage in legitimate cannabis agricultural enterprise.	24-1

Apr 4, 2025	Angela	Sherick-Bright	asherick@pacbell.net	2nd District Unincorporated Area	UHA agrees with the concern voiced in the Program Environmental Impact Report (PEIR) that the Ladera Heights, View Park-Windsor Hills communities could be impacted by increased traffic due to cannabis shops that could possibly be housed in the area. The PEIR states "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." While the PEIR document voices concerns it does not address mitigation measures. The Cannabis Ordinance (CO) identifies commercial and mixed-use areas in Ladera Heights, View Park-Windsor Hills communities where cannabis shops can be housed. Some of the areas are newly upzoned as part of the Westside Area Plan (WSAP) to incentivize increased housing. Given this upzoning and the potential for the placement of cannabis shops, the community is very concerned about increased traffic. Unfortunately, because the existing potential safety hazards, and real hazards, due to "roadway design features" along the Slauson Corridor are already quite significant, the inclusion of cannabis shops will make traffic worse. Specifically, and currently, the intersection of Slauson Avenue and La Brea Avenue for eastbound traffic is especially dangerous between Fairfax Avenue and La Brea Avenue relative to the left-turn lane. Many drivers illegally use the eastbound left-turn lane as a driving lane to bypass the line of cars waiting for the traffic signal to turn green to either proceed along Slauson Avenue or to reach the left-turn lane to turn left onto southbound La Brea Avenue. Drivers have driven through the tall orange plastic pillars that have been erected as an effort to stop this hazardous practice, but to no avail. There have been many collisions, near collisions, and deadly collisions along this Corridor, the inclusion of cannabis shops will increase traffic in an already densely driven area.	25-1
Apr 4, 2025	Matthew	Vo	mvo321@gmail.com	Incorporated City- LA County	These studies prove the serious environmental detriments of cannabis business. We need to do more to protect the environment and close all the cannabis business everywhere.	26-1

APPENDIX C

Environmental Impact Report – Development and Operational Assumptions

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Los Angeles County Commercial Cannabis Business Licensing Program

Environmental Impact Report (EIR) – Development and Operational Assumptions

The following provides a summary of commercial cannabis businesses' likely development and operational features given the regulations included in the Project, State licensing requirements, and actual practices of commercial cannabis businesses that are similar to the businesses that the Project would allow. Although it cannot be determined with certainty exactly where commercial cannabis businesses would be located, how they would be designed, and their specific operational parameters, certain, general conclusions can be derived based on the regulations that would apply and actual business practices that have occurred elsewhere, to date. Given its potential to result in the most severe environmental impacts, the following focuses on indoor cultivation license types; however, a summary of the key operational and design features other license types is provided as well.

EFFECT OF EXISTING AND PROPOSED REGULATIONS ON LICENSE TYPES

As described in Chapter 2, *Project Description* of the Program EIR, the Project would authorize certain cannabis uses in commercial, industrial, institutional, and mixed-use zones. The Project involves amendments to Title 8 and Title 22 of the Los Angeles County (County) Code (LACC) to specify the location and conditions under which certain commercial cannabis activities would be allowed.

Although the Project would allow the establishment of new uses, the Project would not expand, or otherwise relax existing limitations on, the types and amount of physical development that is currently allowed in the zones in which commercial cannabis business would be allowed. Instead, the Project includes additional requirements and limitations for commercial cannabis businesses which do not apply to other uses that are currently allowed in these zones.

For example, commercial cannabis businesses would be required to occupy only existing buildings that conform to the current, Title 22 zoning regulations of the LACC, and cannabis businesses would be subject to additional requirements involving signage, location in relation to sensitive receptors, and crime prevention.

Furthermore, the Project includes unique regulations that would apply to certain commercial cannabis uses that would further limit the scale of commercial cannabis development, as compared to physical development for other uses that are included in the zones in which commercial cannabis uses would be allowed. For example, the number of cannabis businesses would be subject to the following limitations, at least until the time at which the Board of Supervisors exercises its discretion to increase the number of businesses:

- Cultivation (indoor only) – 10 licenses
- Distribution – 10 licenses
- Manufacturing – 10 licenses, and maximum of 50% within the same General Plan Planning Area
- Testing – 10 licenses, and maximum of 50% within the same General Plan Planning Area
- Retail (Storefront and Non-Storefront) – 50 licenses; maximum of 75% within the same General Plan Planning Area; and equal distribution among the five Supervisorial Districts
- Microbusinesses – same limit as applicable license types (above)

LICENSE TYPES

INDOOR CULTIVATION

Assumptions

The Commercial Cannabis Business Licensing Program would limit cannabis cultivation canopy space to 22,000 square feet per lot. The following calculations assume that cannabis cultivation canopy areas are these maximum sizes to calculate the "worst case scenario" for resource consumption and waste disposal requirements. In addition to the area(s) dedicated for cultivation, an indoor cultivation operation likely would include space for the drying and curing of cannabis; trimming and packaging cannabis; supplies storage areas; office; and amenities for employees (e.g., breakroom and restrooms).

State Licensing/Regulatory Compliance Requirements

Water and Wastewater:

The Los Angeles Water Board regulates discharges from medium and large municipal separate storm sewer systems (MS4s) via Regional MS4 permits issued under the National

Pollutant Discharge Elimination System (NPDES) Program. These permits establish discharge prohibitions, effluent limitations, monitoring and reporting program requirements, and minimum control measures (SWRCB 2022). Cultivators would be required to comply with any waste discharge requirements that are applicable to their operation.

Energy:

Regulations and guidance on energy usage during indoor cannabis cultivation have been established through multiple channels, including CCR and DCC. CCR Title 4, Section 15011(a)(5) requires that indoor cultivators identify the power sources they plan to use when applying for a State license. Since 2022, all cultivation licensees authorized to engage in cannabis cultivation have been required to report total electricity use for each power source used to the DCC upon license renewal. In addition, since January 1, 2023, all holders of indoor cultivation license types have had to ensure that electrical power used for their cultivation meets the average electricity greenhouse gas emissions intensity required by their local utility provider (pursuant to the California Renewables Portfolio Standard Program in Division 1, Part 1, Chapter 2.3, Article 16 of the Public Utilities Code). If a licensed cultivator's average weighted greenhouse gas emission intensity, as calculated and reported upon license renewal, is greater than the local utility provider's greenhouse gas emission intensity, the licensee shall obtain carbon offsets to cover the excess in carbon emissions from the previous annual licensed period (DCC 2023; CCR Title 4, Section 16305).

Waste:

There are a variety of laws and regulations that govern the management and disposal of cannabis waste. The majority of these are found in CCR Title 4, Sections 15000 through 17905. Notable regulations include those described in Section 17223, *Waste Management*. This section establishes that all licensees shall dispose of all waste in accordance with the Public Resources Code (PRC) and any other applicable state and local laws and shall evaluate waste to determine if it should be designated and handled as a hazardous waste, as defined in Public Resources Code Section 40141. In addition, cannabis cultivation operations must establish and implement a cannabis waste management plan that describes the methods of cannabis waste disposal. Allowable methods include:

- On-site composting
- Collection and processing by a local agency, a waste hauler franchised or contracted by a local agency, or a permitted private waste hauler
- Self-hauling to a permitted:
    - Solid waste landfill
    - Composting facility or operation
    - In-vessel digestion facility or operation

  - Transferring/processing facility or operation
  - Chip and grind facility or operation
  - Recycling center (with certain conditions)
- Reintroduction into cultivation operations through on-premises organic waste recycling methods including, but not limited to, tilling directly into agricultural land and no-till farming

Given that the indoor cultivation sites would be located in urban areas and on lots that are relatively small (in comparison to agricultural properties), it is unlikely that cultivators would conduct on-site composting and instead would either rely on a hauler or self-haul cannabis organic waste to a disposal facility. Regardless of the hauling method, commercial businesses would be required to maintain all organic wastes in a secured waste receptable or secured area on the premises until the time of disposal.

Resource Consumption, Wastewater Disposal, and Hazardous Materials Involved with Indoor Cultivation

Water Usage:

The amount of water required for indoor cannabis cultivation varies depending on the method (e.g., hydroponic, pots/trays, or aeroponics), substrate, plant density and size, room temperature, humidity, light intensity, and facility components, among other factors (Douglas 2022; Cannabis Control Commission, Commonwealth of Massachusetts [Massachusetts CCC] N.d.). As previously discussed, some facilities have the capacity to set up recycling systems that clean and filter used water to be recycled back into irrigation, which can significantly reduce the amount of freshwater required.

The following quantities of water usage have been calculated as part of studies on indoor cultivation of cannabis[1]:

- 58.4 gallons per square foot per year (gal/sq ft/yr) (Massachusetts CCC N.d.)
- 89.5 gal/sq ft/yr (Douglas 2022)[2]
- 65.7 to 80.3 gal/sq ft/yr (Zheng and Yang 2021)
- **36.5 gal/sq ft/yr** (Milewide Nursery 2015)
- 61.55 gal/sq ft/yr (Mills 2012)
- **198 gal/sq ft/yr** (New Frontier Data et al. 2021)[3]

[1] Some of the cited studies used different units of measurement and have been converted to gallons/square foot/year for comparative purposes in this report.

[2] The report describes this estimate as a "safe estimate," since a crop will likely only require this much water under the most demanding circumstances.

[3] This report had the most robust dataset out of the studies cited in this report.

Using the lowest and highest quantities of water usage calculated from these studies, the range of annual water usage for the largest-sized indoor cannabis cultivation operations that would be allowed pursuant to the Commercial Cannabis Business Licensing Program would be as follows.

Estimated Annual Water Usage:

Single Operator: 803,000 – 4,356,000 gallons/year (or 2.46 – 13.37 acre-feet per year)

Wastewater Generation:

The amount of wastewater generated during indoor cannabis cultivation largely depends on the type of substrate being used, as well as any systems in place to recapture and recycle water (Douglas 2022). Depending on the system in place, this can be done through drainpipes and lines, ditches, dehumidifiers, or condensation recapture modules. Recapture methods can significantly reduce both the demand for irrigation water and wastewater generation; however, even with these methods in place, systems need to be flushed on occasion and new water introduced, especially in the event of pathogen outbreaks or the presence of high levels of salts or ions that could be detrimental to crop growth and development (Massachusetts CCC N.d.).

Despite several studies that have been conducted, currently there is a lack of quantitative information on wastewater generation for cannabis cultivation. This analysis relies upon guidance from cannabis cultivators on establishing an indoor cultivation operation, which states that growers using a run-to-waste system should anticipate wastewater generation to be between 10 and 15 percent of total water used (Douglas 2022). Using the lowest (36.5 gal/sq ft/yr) and highest (198 gal/sq ft/yr) quantities of water usage identified in the above section, this equates to **between 3.65 and 29.7 gal/sq ft/yr**.

Using this range, wastewater generation for the largest-sized indoor cannabis cultivation operations that would be allowed pursuant to the Commercial Cannabis Business Licensing Program would be as follows.

Annual Wastewater Generation:

Single Operator: 80,300 – 653,400 gallons/year

Energy Consumption:

A variety of factors contribute to energy use during indoor cannabis cultivation. The most significant contributor is the high-intensity lighting required for indoor production. Other factors include dehumidification (to remove water vapor and avoid mold formation), space heating or cooling, pre-heating of irrigation water, and ventilation and air-conditioning to remove waste heat (Mills 2012).

A study by Evan Mills (2012) developed a model that identified an electricity demand of 806.13 kilowatt-hours (kWh) per square foot of canopy per year and an electricity productivity of 6.074 kWh for each gram of cannabis yielded. Mills also identified an emissions factor of 4,612 grams of carbon dioxide (CO_2) per gram of cannabis. Mills noted, however, that the study's findings may not accurately represent energy use by the U.S. cannabis sector due to uncertainties in modeling approaches, the likelihood th at cannabis cultivation practices had become more efficient in recent years, and the influences of regional variations in climate, daylight, and other factors (Mills 2012).

A 2018 report by New Frontier Data, Scale Microgrid Solutions, and Resource Innovation Institute included an assessment of the current validity of the Mills report, which had long been a baseline for cannabis energy consumption studies. The 2018 report stated that since the Mills study's publication in 2012, the market has expanded dramatically, and the volume of growers has increased significantly to support demand. As legal production has scaled, growing techniques have evolved. New technologies and innovations (e.g., the accelerated adoption of LED lighting) are being developed to increase operational efficiency and to lower costs. The 2018 New Frontier Data Report built on Mills' work by providing a contemporary assessment of energy consumption in cannabis, while accounting for changes that have occurred in the cannabis industry since 2012. This study identified an average electricity intensity (i.e., electricity demand) of 262 kWh per square foot of canopy space, and an electricity productivity of 1.27 kWh per gram of cannabis. The study also measured added efficiencies from the use of LED lighting; indoor operations using typical high pressure sodium flowering lights showed an average electricity productivity of 0.6 grams per kWh, while indoor operations using LED lights showed an average of 1.4 grams per kWh. While this difference cannot be solely attributed to the use of LEDs, since cultivators who use LEDs are also likely more informed of other efficiency measures, it demonstrates the difference in cost and emissions across different operational components.

The study also found that the state within which the cultivation site is located has a strong impact on electricity intensity/productivity and carbon intensity. In this report, only 4 out of 34 indoor cultivation operations were from California. State-specific data for California identified an electricity intensity of **241 kWh per square foot of canopy space**, an electricity productivity of 1.47 kWh per gram of cannabis, and a carbon intensity of 544.31 grams of CO_2 per gram of cannabis (New Frontier Data et al. 2018).

Using the California energy usage estimates, energy usage for the largest-sized indoor cannabis cultivation operations that would be allowed pursuant to the Commercial Cannabis Business Licensing Program would be as follows.

Annual Electricity Consumption:

Single Operator: 5,302,000 kilowatt-hours/year

Solid Waste and Hazardous Materials:

There is a general lack of information (e.g., quantitative data) available regarding the amount of solid waste that the cannabis industry (including indoor cultivation) generates. However, information exists regarding the characteristics of the waste stream and typical disposal processes that are involved with cannabis cultivation.

The majority of cannabis waste developed from cultivation comes from: unused plant material (i.e., leaves, stems, and other parts of the plant that are not used for their cannabinoid content); trimming and pruning residue (removed during cultivation to enhance flower production); roots and soil (remnants from harvested plants); extracted biomass (residual plant material after extraction processes to isolate cannabinoids and terpenes); and unused/nonviable seeds. The disposal process for cannabis waste varies by jurisdiction and the associated environmental and regulatory setting. Generally, waste is segregated and categorized; rendered unusable to prevent diversion into illicit markets, typically through methods such as grinding or mixing with other materials; transported to processing facilities or designated disposal sites or facilities; and either placed in a landfill, composted, or incinerated (Easy Cannabis Waste N.d.).

For indoor cultivation facilities whose sole operation is cultivation, most waste is likely to be plant material, which is categorized as organic waste. If the waste is not deemed hazardous, it can be transported by local haulers or self-hauled to a fully permitted facility that recycles organic waste (CalRecycle 2022). However, indoor cannabis cultivation also involves the use, storage, transport, or discharge of hazardous materials, particularly with respect to the use of fungicides, insecticides, fertilizers, and other agricultural chemicals, the disposal of which must comply with federal, State, and local regulations. (See Section 3.4, *Hazards and Hazardous Materials*, of this EIR for a description of the regulations.)

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.

Given that distribution only facilitates the transport and temporary storage of cannabis and/or cannabis products, it is unlikely that distribution activities would result in substantial water consumption, wastewater disposal, energy consumption, and/or solid waste disposal. Water consumption would be limited to potable water for employees'

consumption. Wastewater generation would be limited to employees' use of restroom facilities. Given that distribution would be limited to urbanized areas that have existing public services, existing public utilities would provide the incremental increases in potable water and wastewater treatment services to accommodate employees who are involved with distribution activities.

Energy consumption could involve electric or gas energy to illuminate, heat, and cool any buildings used to store cannabis, as well as fuel for vehicles involved in distribution activities. In general, cannabis and cannabis products must be stored in relatively cool, dry environments; however, the energy required to create such environments is similar to typical energy requirements for commercial, industrial, and institutional uses that currently are allowed in the zones in which distribution activities would occur. Furthermore, given the relatively small size and light weight of cannabis and cannabis products, many distributors rely upon vans rather than semitrucks to haul cannabis and cannabis products.

Finally, distributors may operate out of the same facilities that are used for other types of cannabis uses (e.g., indoor cultivation sites) or occupy a separate facility/location. Regardless of the location, distribution facilities are likely to have areas for (un)loading products; storage area(s) for securely storing cannabis and cannabis products; parking areas for transport vehicles; office; and amenities for employees (e.g., breakroom and restrooms).

MANUFACTURING – VOLATILE AND NON-VOLATILE

Cannabis product manufacturing is defined as production, preparation, propagation, or compounding of manufactured cannabis products directly or indirectly, by extraction methods, independently by means of chemical synthesis, or by a combination of extraction and chemical synthesis at a fixed location dedicated to packaging or repackaging cannabis. This process also can involve the transition of raw cannabis into other products, such as oil, rosin, hash, or tinctures, which are often used in other products, such as edibles, salves, and cosmetics.

Manufacturing can use intensive processes, such as closed system, super-critical carbon dioxide processes for hash production and heated hydraulic pressing for creating rosin, or less intensive methods, such as screen filtering for straining hash or soaking cannabis in alcohol to create tinctures. Extraction activities generally involve either solventless extraction or solvent-based extraction.

Solventless extraction involve activities such as dry-sieving, water extraction, and rosin press extraction. Solventless extractions methods remove cannabinoids using heat and pressure and are less common in commercial operations given that they are relatively time-consuming and labor-intensive (Lazarjani et al, 2021). Consequently, solventless

extraction methods are unlikely to be used (at least on a widescale) as part of commercial operations that the Project would allow.

In contrast, solvent-based extraction is more likely to occur given the relatively short time and less labor involved with it in comparison to solventless extraction. Solvent-based extraction processes use at least one of the following: low molecular mass organic solvents; vegetable fats (oils); and supercritical fluids (e.g., carbon dioxide) (Ibid). Typical solvents include ethanol, butane, propane, hexane, petroleum ether, methyl tertbutyl ether, diethyl ether, carbon dioxide, and lipids (e.g., olive oil).

Required manufacturing equipment varies depending on the specific processes to be implemented. Manufacturing can include machinery engineered specifically for extraction, such as closed loop CO_2 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)[4] concentrates, edibles, topical products, and cartridges for vape pens for distribution to consumers.

Manufactured cannabis products include:

- **Hash** – a product made from filtered cannabis plant matter. Methods of filtering can include screening with mesh, cold water filtration, and heat pressing to form rosin.
- **Tinctures** – a product made by dissolving cannabis in alcohol, such as ethanol or glycerin.
- **Infusions** – a product made using heat to infuse foods, oils, or liquids with cannabis.
- **Extractions** – a product made using solvents to dissolve THC from the cannabis plant matter. Processes can be volatile and potentially explosive, such as production of butane hash oil and high-pressure CO_2 extract, or non-volatile, such as the production of low-pressure CO_2 extract.

These products are created using a variety of manufacturing processes that range from low input/low risk to high input/high risk, as follows.

- **Infused Products** - Infuses raw cannabis flower/leaves or prepared concentrate into different media (e.g., oil, milk, butter, or other lipids) to make new products such as edibles like baked goods, tinctures, lotions, salves, soaps, and cartridges for vape pens.
- **Non-flammable Extraction** - Using cold water, ice, heat press, lipids (e.g., butter, milk, or oil) or other non-chemical extraction method to make bubble hash, kief, rosin, cannabis-infused lipid, or comparable materials. CO_2 extraction is used to make cannabis concentrates/oil (closed loop only) under pressure.

[4] The principal psychoactive constituent of cannabis. "Dronabinol" is the international nonproprietary name, or official generic name, used for pharmaceutical reference as an active ingredient.

- **Flammable Extraction** - Compressed and uncompressed liquid solvents using pentane, hexane, butane, propane, ethanol, or similar materials to make cannabis concentrates/oil (closed loop only); and post-extraction refinement that involves refining previously extracted cannabis concentrates through processes such as chromatography, to make distillates.

Commercial manufacturing process locations can vary in size and range from a 100 sf room to a 5,000 sf warehouse floor. Furthermore, given the variability in product concentrations and methodologies that may be used in manufacturing operations, the amount of water consumption involved in manufacturing processes cannot be estimated with certainty. For example, whereas use of petroleum ether or ethanol as solvents can involve the use of boiling water for extraction/separation processes, other solvents like olive oil do not require the use of boiling water for separation processes but may use water for initial extraction of cannabinoids (Ibid). Similarly, the amount of wastewater that is generated will vary depending on the specific manufacturing process that is used, and the amount of energy consumption that is required would depend on the specific extraction methodology and equipment that is used in the manufacturing process.

Finally, those who engage in manufacturing may operate out of the same facilities that are used for other types of cannabis uses (e.g., indoor cultivation sites) or occupy a separate facility/location. Regardless of the location, processing facilities are likely to have areas for processing equipment; storage area(s) for securely storing cannabis and cannabis products; storage areas for hazardous and other materials used in manufacturing processes; parking areas for transport vehicles; office; and amenities for employees (e.g., breakroom and restrooms).

TESTING

Quality control testing is conducted to ensure that products are safe for human consumption. Testing involves shipping a sample of cannabis product that is ready to be sold from the cultivator or manufacturer to the testing laboratory to conduct quality control testing pursuant to State law. Once approved, the cannabis product can be sold to consumers.

DCC adopted regulations implementing Business and Professions Code Section 26100(f)(2) pertaining to the establishment of a standard cannabinoids test method, including standardized operating procedures (SOPs) that all licensed testing laboratories in California must use. The SOPs include standard procedures and instructions for the determination of cannabinoids concentration for dried flower, including non-infused pre-rolls by High Performance Liquid Chromatography (HPLC). The HPLC process involves use of water, methanol, acetonitrile, and formic acid as reagents and requires use of the following specific technologies and equipment:

- HPLC equipment consisting of a column module, solvent delivery module, photodiode-array detection module and sampling module that can separate the cannabinoids of interest.
- Tissue homogenizer capable of grinding samples to less than 1 mm.
- Cryogenic grinder capable of grinding samples to less than 1 mm (DCC 2022).

Many licensed laboratories use testing methods that are similar to those that are required for the commercial cannabis industry and, consequently, are in possession of all relevant apparatus and materials necessary to comply with the State's testing criteria.

There are no minimum spatial or other design requirements that apply to testing laboratories. However, the design of laboratories typically involves consideration of the following:

- Use of equipment including bench space, fume hoods, and biosafety cabinets
- Minimum floor-to-floor and ceiling heights
- Column-free zones
- Lab modules and structural bays
- Areas for office space, cold storage, collaboration, restrooms, breakroom, and any other ancillary uses/activities
- Areas for the storage of hazardous materials and waste (Saggars and Paskanik, N.D.; ULP, 2025)

Given the similarities between non-cannabis and cannabis testing labs regarding the types of equipment and testing procedures that are conducted, it is possible that existing labs that currently do not test cannabis and cannabis products may expand their operations to do so. Alternatively, entirely new labs could be established to test cannabis and cannabis products. Those who possess a State testing license may not possess a license to conduct any other type of commercial cannabis activity; therefore, testing labs would not be combined with any of the other commercial cannabis activities that the Project would allow.

Testing labs would create water demand from the use of water as a reagent in testing processes, as well as water for employees' consumption and restrooms. In addition, testing labs would produce wastewater generation from testing processes and employees' use of restrooms. Energy consumption would result from lighting, heating, and use of equipment in testing laboratories. Finally, laboratories' operations would involve the storage, use, and handling of certain hazardous materials such as methanol and formic acid.

RETAIL – STOREFRONT AND NON-STOREFRONT

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 floor plans and designs of storefront retail cannabis businesses vary based on the desired branding, customer experience, inventory management, presentation/display of products, etc., but most include the following general components: security check-in area near or at the public entrance; display area(s) for cannabis and cannabis products; locations and/or equipment for cashiers ("budtenders"); storage area(s) for products; restrooms; parking for employees and customers; (un)loading areas; employee/supplier entrance separate from the public entrance; and ancillary spaces for employees (e.g., breakroom and office).

Storefront retail establishments tend to fall within one of the following design typologies:

- **Bank.** As the name suggests, bank style layouts have a similar flow to a local bank, whereby products are located at stations with their own cash registers, and the customer selects products and their order is fulfilled on the spot by an employee.
- **Pharmacy.** The pharmacy style layout provides a similar customer experience to bank style layouts. In this design, the customers view products located in locked display cases and an employee meets them on the sales floor with a tablet or handheld device to fill a digital shopping cart for the customer. Once the customer is done shopping, the employee completes the sales transaction and the order is fulfilled in the secured back of house.
- **Open Retail.** The open retail layout involves the display of dummy products, or products that are locked in cases, so customers can fill their own digital shopping cart from a QR code or link on their phone as they browse. Employees will then check and enter the customer's order on the sales floor for it to be filled in the back of house. The guest checks out at a centralized pay station and receives their order.
- **Kiosk.** In the kiosk model, displays of products exist on the sales floor along with kiosks at which customers may place their orders. Once the order is placed, the customer works with an employee at a central terminal to complete the transaction and receive their product (Flowhub 2025, Shelter 2023).

Non-storefront retail cannabis establishments do not have the same space and design requirements as storefront retail cannabis establishments, given that they are not designed for the purpose of creating a specific onsite customer experience, branding, presentation/display of products, etc. Instead, facilities are designed solely for employees' use and typically include: storage area(s) for products; area(s) for assembling/packaging customer orders; restrooms; parking for employees; (un)loading areas; employee/supplier entrance(s); and ancillary spaces for employees (e.g., breakroom and office). As stated above for distribution, given the relatively small size and light weight of cannabis products, deliveries are typically conducted using standard automobiles or vans, rather than hauling trucks.

Cannabis retail businesses would generate water demand from employees' and, in the case of storefront retail, customers' consumption of potable water and use of restrooms. In addition, cannabis retail businesses would produce wastewater from the use of restrooms. Energy consumption would result from lighting, heating, and equipment usage (e.g., computer cash registers).

MICROBUSINESSES

The Project would allow cannabis microbusinesses that consist of at least three of the following small-scale cannabis activities at one location:

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

Given the options of cannabis activities that can constitute a microbusinesses, the physical requirements for conducting microbusinesses can vary. However, it is likely that microbusinesses will involve the same types of spatial configurations, equipment, facilities, resource consumption, and waste generation as the corresponding uses described above—albeit at a smaller scale than would occur if any of the uses constituting the microbusiness were to be licensed as standalone uses (e.g., 10,000 sf of indoor cultivation canopy with a microbusiness license, rather than 22,000 of indoor cultivation canopy for an indoor cultivation license for a single operator).

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APPENDIX D

CalEEMod Detailed Reports

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Cultivation LA Cannabis Detailed Report

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4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Cultivation LA Cannabis
Operational Year	2026
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	1.80
Precipitation (days)	22.4
Location	33.99842672064932, -117.88667154603404
County	Los Angeles-South Coast
City	Unincorporated
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	5079
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
User Defined Industrial	1.00	User Defined Unit	0.80	25,000	0.00	0.00	—	Cultivation Property

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.88	0.86	0.08	1.92	< 0.005	< 0.005	0.19	0.20	< 0.005	0.05	0.05	21.5	5,276	5,297	2.67	0.09	0.72	5,391
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.69	0.68	0.08	0.75	< 0.005	< 0.005	0.19	0.19	< 0.005	0.05	0.05	21.5	5,262	5,284	2.67	0.09	0.02	5,377
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.80	0.78	0.07	1.34	< 0.005	< 0.005	0.14	0.15	< 0.005	0.04	0.04	21.5	5,218	5,240	2.67	0.09	0.24	5,332
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.15	0.14	0.01	0.24	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	3.57	864	868	0.44	0.01	0.04	883

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.09	0.08	0.07	0.83	< 0.005	< 0.005	0.19	0.19	< 0.005	0.05	0.05	—	213	213	0.01	0.01	0.72	216

Area	0.79	0.78	0.01	1.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.47	4.47	< 0.005	< 0.005	—	4.49
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	5,029	5,029	0.48	0.06	—	5,058
Water	—	—	—	—	—	—	—	—	—	—	—	8.81	29.7	38.5	0.91	0.02	—	67.7
Waste	—	—	—	—	—	—	—	—	—	—	—	12.7	0.00	12.7	1.27	0.00	—	44.6
Total	0.88	0.86	0.08	1.92	< 0.005	< 0.005	0.19	0.20	< 0.005	0.05	0.05	21.5	5,276	5,297	2.67	0.09	0.72	5,391
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.09	0.08	0.08	0.75	< 0.005	< 0.005	0.19	0.19	< 0.005	0.05	0.05	—	204	204	0.01	0.01	0.02	207
Area	0.60	0.60	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	5,029	5,029	0.48	0.06	—	5,058
Water	—	—	—	—	—	—	—	—	—	—	—	8.81	29.7	38.5	0.91	0.02	—	67.7
Waste	—	—	—	—	—	—	—	—	—	—	—	12.7	0.00	12.7	1.27	0.00	—	44.6
Total	0.69	0.68	0.08	0.75	< 0.005	< 0.005	0.19	0.19	< 0.005	0.05	0.05	21.5	5,262	5,284	2.67	0.09	0.02	5,377
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.07	0.06	0.06	0.59	< 0.005	< 0.005	0.14	0.15	< 0.005	0.04	0.04	—	157	157	0.01	0.01	0.24	159
Area	0.73	0.72	0.01	0.74	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.06	3.06	< 0.005	< 0.005	—	3.07
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	5,029	5,029	0.48	0.06	—	5,058
Water	—	—	—	—	—	—	—	—	—	—	—	8.81	29.7	38.5	0.91	0.02	—	67.7
Waste	—	—	—	—	—	—	—	—	—	—	—	12.7	0.00	12.7	1.27	0.00	—	44.6
Total	0.80	0.78	0.07	1.34	< 0.005	< 0.005	0.14	0.15	< 0.005	0.04	0.04	21.5	5,218	5,240	2.67	0.09	0.24	5,332
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	0.01	0.01	0.11	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	25.9	25.9	< 0.005	< 0.005	0.04	26.3
Area	0.13	0.13	< 0.005	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.51	0.51	< 0.005	< 0.005	—	0.51
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	833	833	0.08	0.01	—	837
Water	—	—	—	—	—	—	—	—	—	—	—	1.46	4.92	6.37	0.15	< 0.005	—	11.2
Waste	—	—	—	—	—	—	—	—	—	—	—	2.11	0.00	2.11	0.21	0.00	—	7.38
Total	0.15	0.14	0.01	0.24	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	3.57	864	868	0.44	0.01	0.04	883

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	0.09	0.08	0.07	0.83	< 0.005	< 0.005	0.19	0.19	< 0.005	0.05	0.05	—	213	213	0.01	0.01	0.72	216
Total	0.09	0.08	0.07	0.83	< 0.005	< 0.005	0.19	0.19	< 0.005	0.05	0.05	—	213	213	0.01	0.01	0.72	216
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	0.09	0.08	0.08	0.75	< 0.005	< 0.005	0.19	0.19	< 0.005	0.05	0.05	—	204	204	0.01	0.01	0.02	207
Total	0.09	0.08	0.08	0.75	< 0.005	< 0.005	0.19	0.19	< 0.005	0.05	0.05	—	204	204	0.01	0.01	0.02	207
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	0.01	0.01	0.01	0.11	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	25.9	25.9	< 0.005	< 0.005	0.04	26.3
Total	0.01	0.01	0.01	0.11	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	25.9	25.9	< 0.005	< 0.005	0.04	26.3

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	5,029	5,029	0.48	0.06	—	5,058
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,029	5,029	0.48	0.06	—	5,058
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	5,029	5,029	0.48	0.06	—	5,058
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,029	5,029	0.48	0.06	—	5,058
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	833	833	0.08	0.01	—	837
Total	—	—	—	—	—	—	—	—	—	—	—	—	833	833	0.08	0.01	—	837

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.53	0.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.19	0.18	0.01	1.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.47	4.47	< 0.005	< 0.005	—	4.49
Total	0.79	0.78	0.01	1.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.47	4.47	< 0.005	< 0.005	—	4.49

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.53	0.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.06	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.60	0.60	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.02	0.02	< 0.005	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.51	0.51	< 0.005	< 0.005	—	0.51
Total	0.13	0.13	< 0.005	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.51	0.51	< 0.005	< 0.005	—	0.51

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	8.81	29.7	38.5	0.91	0.02	—	67.7
Total	—	—	—	—	—	—	—	—	—	—	—	8.81	29.7	38.5	0.91	0.02	—	67.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	8.81	29.7	38.5	0.91	0.02	—	67.7
Total	—	—	—	—	—	—	—	—	—	—	—	8.81	29.7	38.5	0.91	0.02	—	67.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	1.46	4.92	6.37	0.15	< 0.005	—	11.2
Total	—	—	—	—	—	—	—	—	—	—	—	1.46	4.92	6.37	0.15	< 0.005	—	11.2

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	12.7	0.00	12.7	1.27	0.00	—	44.6
Total	—	—	—	—	—	—	—	—	—	—	—	12.7	0.00	12.7	1.27	0.00	—	44.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	12.7	0.00	12.7	1.27	0.00	—	44.6
Total	—	—	—	—	—	—	—	—	—	—	—	12.7	0.00	12.7	1.27	0.00	—	44.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	2.11	0.00	2.11	0.21	0.00	—	7.38
Total	—	—	—	—	—	—	—	—	—	—	—	2.11	0.00	2.11	0.21	0.00	—	7.38

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
User Defined Industrial	22.0	5.00	2.00	6,101	272	61.9	24.8	75,512

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	37,500	12,500	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
User Defined Industrial	5,302,000	346	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
User Defined Industrial	4,598,000	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
User Defined Industrial	23.6	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	15.5	annual days of extreme heat
Extreme Precipitation	6.30	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	2.42	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	4	1	1	4
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2

Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	64.7
AQ-PM	89.0
AQ-DPM	92.2
Drinking Water	51.1
Lead Risk Housing	41.5
Pesticides	0.00
Toxic Releases	82.2
Traffic	86.6
Effect Indicators	—
CleanUp Sites	71.6
Groundwater	68.9

Haz Waste Facilities/Generators	35.6
Impaired Water Bodies	51.2
Solid Waste	52.9
Sensitive Population	—
Asthma	16.1
Cardio-vascular	18.6
Low Birth Weights	7.66
Socioeconomic Factor Indicators	—
Education	57.9
Housing	62.4
Linguistic	95.3
Poverty	34.2
Unemployment	62.4

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	48.96702169
Employed	46.28512768
Median HI	50.93032208
Education	—
Bachelor's or higher	57.47465674
High school enrollment	17.54138329
Preschool enrollment	84.0626203
Transportation	—
Auto Access	50.17323239
Active commuting	60.3105351

Social	—
2-parent households	27.29372514
Voting	16.36083665
Neighborhood	—
Alcohol availability	64.0189914
Park access	31.27165405
Retail density	95.79109457
Supermarket access	85.57679969
Tree canopy	48.55639677
Housing	—
Homeownership	83.34402669
Housing habitability	53.45823175
Low-inc homeowner severe housing cost burden	20.39009367
Low-inc renter severe housing cost burden	24.79147953
Uncrowded housing	47.26036186
Health Outcomes	—
Insured adults	41.04965995
Arthritis	0.0
Asthma ER Admissions	80.9
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	59.4
Cognitively Disabled	56.3
Physically Disabled	55.6

Heart Attack ER Admissions	77.6
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	50.7
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	68.4
Elderly	23.9
English Speaking	15.1
Foreign-born	90.5
Outdoor Workers	82.8
Climate Change Adaptive Capacity	—
Impervious Surface Cover	28.4
Traffic Density	85.0
Traffic Access	23.0
Other Indices	—
Hardship	42.5
Other Decision Support	—
2016 Voting	19.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	58.0
Healthy Places Index Score for Project Location (b)	50.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Project Details	Example cannabis cultivation facility for operational emissions estimates
Land Use	Rough estimates for cannabis cultivation facility
Operations: Vehicle Data	Basic assumption for an example cannabis cultivation facility
Operations: Energy Use	Project specific assumptions for an indoor cultivation facility (see Indoor Cultivation Scenario)
Operations: Water and Waste Water	Project specific assumption
Operations: Solid Waste	Project specific assumptions

Cannabis Manufacturing Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Cannabis Manufacturing
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.30
Precipitation (days)	17.4
Location	33.8475828699997, -118.2118459581967
County	Los Angeles-South Coast
City	Unincorporated
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4676
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Manufacturing	1.00	1000sqft	0.02	1,000	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.06	0.05	0.03	0.27	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	1.11	77.9	79.0	0.12	< 0.005	0.44	83.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.05	0.05	0.03	0.20	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	1.11	75.5	76.6	0.12	< 0.005	0.26	80.8
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.05	0.04	0.03	0.18	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	1.11	60.3	61.5	0.12	< 0.005	0.31	65.5
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01	0.01	< 0.005	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	0.18	9.99	10.2	0.02	< 0.005	0.05	10.8

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.02	0.02	0.02	0.21	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	53.4	53.4	< 0.005	< 0.005	0.18	54.3

Area	0.03	0.03	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.18	0.18	< 0.005	< 0.005	—	0.18
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.8	22.8	< 0.005	< 0.005	—	22.9
Water	—	—	—	—	—	—	—	—	—	—	—	0.44	1.49	1.94	0.05	< 0.005	—	3.40
Waste	—	—	—	—	—	—	—	—	—	—	—	0.67	0.00	0.67	0.07	0.00	—	2.34
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Total	0.06	0.05	0.03	0.27	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	1.11	77.9	79.0	0.12	< 0.005	0.44	83.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.02	0.02	0.02	0.19	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	51.2	51.2	< 0.005	< 0.005	< 0.005	51.9
Area	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.8	22.8	< 0.005	< 0.005	—	22.9
Water	—	—	—	—	—	—	—	—	—	—	—	0.44	1.49	1.94	0.05	< 0.005	—	3.40
Waste	—	—	—	—	—	—	—	—	—	—	—	0.67	0.00	0.67	0.07	0.00	—	2.34
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Total	0.05	0.05	0.03	0.20	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	1.11	75.5	76.6	0.12	< 0.005	0.26	80.8
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.02	0.01	0.01	0.14	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	35.9	35.9	< 0.005	< 0.005	0.05	36.5
Area	0.03	0.03	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.12	0.12	< 0.005	< 0.005	—	0.12
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	22.8	22.8	< 0.005	< 0.005	—	22.9
Water	—	—	—	—	—	—	—	—	—	—	—	0.44	1.49	1.94	0.05	< 0.005	—	3.40
Waste	—	—	—	—	—	—	—	—	—	—	—	0.67	0.00	0.67	0.07	0.00	—	2.34
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Total	0.05	0.04	0.03	0.18	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	1.11	60.3	61.5	0.12	< 0.005	0.31	65.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	5.95	5.95	< 0.005	< 0.005	0.01	6.03
Area	0.01	0.01	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.02	0.02	< 0.005	< 0.005	—	0.02
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.78	3.78	< 0.005	< 0.005	—	3.79

Water	—	—	—	—	—	—	—	—	—	—	—	0.07	0.25	0.32	0.01	< 0.005	—	0.56
Waste	—	—	—	—	—	—	—	—	—	—	—	0.11	0.00	0.11	0.01	0.00	—	0.39
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	0.01	0.01	< 0.005	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	0.18	9.99	10.2	0.02	< 0.005	0.05	10.8

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.02	0.02	0.02	0.21	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	53.4	53.4	< 0.005	< 0.005	0.18	54.3
Total	0.02	0.02	0.02	0.21	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	53.4	53.4	< 0.005	< 0.005	0.18	54.3
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	0.02	0.02	0.02	0.19	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	51.2	51.2	< 0.005	< 0.005	< 0.005	51.9
Total	0.02	0.02	0.02	0.19	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	51.2	51.2	< 0.005	< 0.005	< 0.005	51.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	5.95	5.95	< 0.005	< 0.005	0.01	6.03
Total	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	5.95	5.95	< 0.005	< 0.005	0.01	6.03

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	9.10	9.10	< 0.005	< 0.005	—	9.15
Total	—	—	—	—	—	—	—	—	—	—	—	—	9.10	9.10	< 0.005	< 0.005	—	9.15
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	9.10	9.10	< 0.005	< 0.005	—	9.15
Total	—	—	—	—	—	—	—	—	—	—	—	—	9.10	9.10	< 0.005	< 0.005	—	9.15
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	1.51	1.51	< 0.005	< 0.005	—	1.52
Total	—	—	—	—	—	—	—	—	—	—	—	—	1.51	1.51	< 0.005	< 0.005	—	1.52

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.27	2.27	< 0.005	< 0.005	—	2.28
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.27	2.27	< 0.005	< 0.005	—	2.28

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	0.01	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.18	0.18	< 0.005	< 0.005	—	0.18
Total	0.03	0.03	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.18	0.18	< 0.005	< 0.005	—	0.18
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consum Products	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.02	0.02	< 0.005	< 0.005	—	0.02
Total	0.01	0.01	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.02	0.02	< 0.005	< 0.005	—	0.02

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	0.44	1.49	1.94	0.05	< 0.005	—	3.40
Total	—	—	—	—	—	—	—	—	—	—	—	0.44	1.49	1.94	0.05	< 0.005	—	3.40

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	0.44	1.49	1.94	0.05	< 0.005	—	3.40
Total	—	—	—	—	—	—	—	—	—	—	—	0.44	1.49	1.94	0.05	< 0.005	—	3.40
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	0.07	0.25	0.32	0.01	< 0.005	—	0.56
Total	—	—	—	—	—	—	—	—	—	—	—	0.07	0.25	0.32	0.01	< 0.005	—	0.56

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	0.67	0.00	0.67	0.07	0.00	—	2.34
Total	—	—	—	—	—	—	—	—	—	—	—	0.67	0.00	0.67	0.07	0.00	—	2.34
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	0.67	0.00	0.67	0.07	0.00	—	2.34
Total	—	—	—	—	—	—	—	—	—	—	—	0.67	0.00	0.67	0.07	0.00	—	2.34
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	0.11	0.00	0.11	0.01	0.00	—	0.39
Total	—	—	—	—	—	—	—	—	—	—	—	0.11	0.00	0.11	0.01	0.00	—	0.39

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.26	0.26
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Manufacturing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Manufacturing	3.93	6.42	5.09	1,625	41.7	68.2	54.1	17,254

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	1,500	500	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Manufacturing	9,593	346	0.0330	0.0040	42,802

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Manufacturing	231,250	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Manufacturing	1.24	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Manufacturing	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.19	annual days of extreme heat
Extreme Precipitation	4.30	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2

Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	26.7
AQ-PM	90.1
AQ-DPM	89.9
Drinking Water	59.8
Lead Risk Housing	49.5
Pesticides	13.3
Toxic Releases	99.1
Traffic	84.2
Effect Indicators	—
CleanUp Sites	94.3
Groundwater	98.8

Haz Waste Facilities/Generators	97.0
Impaired Water Bodies	90.1
Solid Waste	86.5
Sensitive Population	—
Asthma	83.2
Cardio-vascular	59.2
Low Birth Weights	94.8
Socioeconomic Factor Indicators	—
Education	68.4
Housing	41.9
Linguistic	26.4
Poverty	42.2
Unemployment	26.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	48.95418966
Employed	53.74053638
Median HI	42.39702297
Education	—
Bachelor's or higher	18.02900038
High school enrollment	0.282304632
Preschool enrollment	85.64095984
Transportation	—
Auto Access	98.98626973
Active commuting	30.02694726

Social	—
2-parent households	3.310663416
Voting	29.66765046
Neighborhood	—
Alcohol availability	11.40767355
Park access	32.54202489
Retail density	80.7134608
Supermarket access	14.80816117
Tree canopy	38.62440652
Housing	—
Homeownership	99.7305274
Housing habitability	43.48774541
Low-inc homeowner severe housing cost burden	20.32593353
Low-inc renter severe housing cost burden	11.6514821
Uncrowded housing	52.91928654
Health Outcomes	—
Insured adults	19.59450789
Arthritis	13.5
Asthma ER Admissions	5.9
High Blood Pressure	4.8
Cancer (excluding skin)	11.3
Asthma	96.9
Coronary Heart Disease	0.6
Chronic Obstructive Pulmonary Disease	27.0
Diagnosed Diabetes	11.3
Life Expectancy at Birth	28.8
Cognitively Disabled	28.0
Physically Disabled	8.8

Heart Attack ER Admissions	9.1
Mental Health Not Good	67.2
Chronic Kidney Disease	2.1
Obesity	37.0
Pedestrian Injuries	87.7
Physical Health Not Good	32.6
Stroke	2.9
Health Risk Behaviors	—
Binge Drinking	72.5
Current Smoker	70.0
No Leisure Time for Physical Activity	36.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	78.7
Elderly	24.7
English Speaking	84.0
Foreign-born	54.0
Outdoor Workers	37.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	4.0
Traffic Density	81.0
Traffic Access	47.8
Other Indices	—
Hardship	57.8
Other Decision Support	—
2016 Voting	35.9

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	93.0
Healthy Places Index Score for Project Location (b)	15.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	Wilmington Long Beach Carson

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

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Cannabis Testing Operation Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Cannabis Testing Operation
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.30
Precipitation (days)	17.4
Location	33.8479897231817, -118.22628871957521
County	Los Angeles-South Coast
City	Unincorporated
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4615
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Research & Development	1.00	1000sqft	0.02	1,000	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.08	0.07	0.04	0.42	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	0.98	121	122	0.11	0.01	0.34	127
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.07	0.06	0.04	0.34	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	0.98	117	118	0.11	0.01	0.03	122
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.06	0.06	0.03	0.30	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	0.98	95.7	96.7	0.11	0.01	0.13	101
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01	0.01	0.01	0.05	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	0.16	15.8	16.0	0.02	< 0.005	0.02	16.7

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.04	0.04	0.03	0.37	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	92.4	92.4	< 0.005	< 0.005	0.31	93.8

Area	0.03	0.03	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.18	0.18	< 0.005	< 0.005	—	0.18
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	25.0	25.0	< 0.005	< 0.005	—	25.1
Water	—	—	—	—	—	—	—	—	—	—	—	0.94	3.17	4.12	0.10	< 0.005	—	7.23
Waste	—	—	—	—	—	—	—	—	—	—	—	0.04	0.00	0.04	< 0.005	0.00	—	0.14
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	0.08	0.07	0.04	0.42	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	0.98	121	122	0.11	0.01	0.34	127
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.04	0.04	0.03	0.34	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	88.5	88.5	< 0.005	< 0.005	0.01	89.7
Area	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	25.0	25.0	< 0.005	< 0.005	—	25.1
Water	—	—	—	—	—	—	—	—	—	—	—	0.94	3.17	4.12	0.10	< 0.005	—	7.23
Waste	—	—	—	—	—	—	—	—	—	—	—	0.04	0.00	0.04	< 0.005	0.00	—	0.14
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	0.07	0.06	0.04	0.34	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	0.98	117	118	0.11	0.01	0.03	122
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.03	0.03	0.03	0.26	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	67.4	67.4	< 0.005	< 0.005	0.10	68.4
Area	0.03	0.03	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.12	0.12	< 0.005	< 0.005	—	0.12
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	25.0	25.0	< 0.005	< 0.005	—	25.1
Water	—	—	—	—	—	—	—	—	—	—	—	0.94	3.17	4.12	0.10	< 0.005	—	7.23
Waste	—	—	—	—	—	—	—	—	—	—	—	0.04	0.00	0.04	< 0.005	0.00	—	0.14
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	0.06	0.06	0.03	0.30	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	0.98	95.7	96.7	0.11	0.01	0.13	101
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	0.01	< 0.005	0.05	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	11.2	11.2	< 0.005	< 0.005	0.02	11.3
Area	0.01	0.01	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.02	0.02	< 0.005	< 0.005	—	0.02
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.14	4.14	< 0.005	< 0.005	—	4.16

Water	—	—	—	—	—	—	—	—	—	—	—	0.16	0.53	0.68	0.02	< 0.005	—	1.20
Waste	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.02
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	0.01	0.01	0.01	0.05	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	0.16	15.8	16.0	0.02	< 0.005	0.02	16.7

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	0.04	0.04	0.03	0.37	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	92.4	92.4	< 0.005	< 0.005	0.31	93.8
Total	0.04	0.04	0.03	0.37	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	92.4	92.4	< 0.005	< 0.005	0.31	93.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	0.04	0.04	0.03	0.34	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	88.5	88.5	< 0.005	< 0.005	0.01	89.7
Total	0.04	0.04	0.03	0.34	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	88.5	88.5	< 0.005	< 0.005	0.01	89.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	0.01	0.01	< 0.005	0.05	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	11.2	11.2	< 0.005	< 0.005	0.02	11.3

Total	0.01	0.01	< 0.005	0.05	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	11.2	11.2	< 0.005	< 0.005	0.02	11.3

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	—	16.9	16.9	< 0.005	< 0.005	—	17.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	16.9	16.9	< 0.005	< 0.005	—	17.0
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	—	16.9	16.9	< 0.005	< 0.005	—	17.0
Total	—	—	—	—	—	—	—	—	—	—	—	—	16.9	16.9	< 0.005	< 0.005	—	17.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	—	2.80	2.80	< 0.005	< 0.005	—	2.81
Total	—	—	—	—	—	—	—	—	—	—	—	—	2.80	2.80	< 0.005	< 0.005	—	2.81

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.12	8.12	< 0.005	< 0.005	—	8.15
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.12	8.12	< 0.005	< 0.005	—	8.15
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.12	8.12	< 0.005	< 0.005	—	8.15
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.12	8.12	< 0.005	< 0.005	—	8.15
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.34	1.34	< 0.005	< 0.005	—	1.35
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.34	1.34	< 0.005	< 0.005	—	1.35

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer Product	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	0.01	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.18	0.18	< 0.005	< 0.005	—	0.18
Total	0.03	0.03	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.18	0.18	< 0.005	< 0.005	—	0.18
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.02	0.02	< 0.005	< 0.005	—	0.02
Total	0.01	0.01	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.02	0.02	< 0.005	< 0.005	—	0.02

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	0.94	3.17	4.12	0.10	< 0.005	—	7.23
Total	—	—	—	—	—	—	—	—	—	—	—	0.94	3.17	4.12	0.10	< 0.005	—	7.23
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	0.94	3.17	4.12	0.10	< 0.005	—	7.23
Total	—	—	—	—	—	—	—	—	—	—	—	0.94	3.17	4.12	0.10	< 0.005	—	7.23
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	0.16	0.53	0.68	0.02	< 0.005	—	1.20
Total	—	—	—	—	—	—	—	—	—	—	—	0.16	0.53	0.68	0.02	< 0.005	—	1.20

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	0.04	0.00	0.04	< 0.005	0.00	—	0.14
Total	—	—	—	—	—	—	—	—	—	—	—	0.04	0.00	0.04	< 0.005	0.00	—	0.14
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	0.04	0.00	0.04	< 0.005	0.00	—	0.14
Total	—	—	—	—	—	—	—	—	—	—	—	0.04	0.00	0.04	< 0.005	0.00	—	0.14
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.02
Total	—	—	—	—	—	—	—	—	—	—	—	0.01	0.00	0.01	< 0.005	0.00	—	0.02

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Research	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Research & Development	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Research & Development	11.3	1.90	1.11	3,093	118	19.9	11.6	32,349

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	1,500	500	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Research & Development	17,820	346	0.0330	0.0040	25,346

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Research & Development	491,694	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Research & Development	0.08	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Research & Development	Household refrigerators and/or freezers	R-134a	1,430	0.45	0.60	0.00	1.00
Research & Development	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.19	annual days of extreme heat
Extreme Precipitation	4.30	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	26.7
AQ-PM	90.1
AQ-DPM	89.9
Drinking Water	59.8
Lead Risk Housing	49.5
Pesticides	13.3
Toxic Releases	99.1
Traffic	84.2
Effect Indicators	—
CleanUp Sites	94.3
Groundwater	98.8
Haz Waste Facilities/Generators	97.0
Impaired Water Bodies	90.1
Solid Waste	86.5

Sensitive Population	—
Asthma	83.2
Cardio-vascular	59.2
Low Birth Weights	94.8
Socioeconomic Factor Indicators	—
Education	68.4
Housing	41.9
Linguistic	26.4
Poverty	42.2
Unemployment	26.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	48.95418966
Employed	53.74053638
Median HI	42.39702297
Education	—
Bachelor's or higher	18.02900038
High school enrollment	0.282304632
Preschool enrollment	85.64095984
Transportation	—
Auto Access	98.98626973
Active commuting	30.02694726
Social	—
2-parent households	3.310663416
Voting	29.66765046

Neighborhood	—
Alcohol availability	11.40767355
Park access	32.54202489
Retail density	80.7134608
Supermarket access	14.80816117
Tree canopy	38.62440652
Housing	—
Homeownership	99.7305274
Housing habitability	43.48774541
Low-inc homeowner severe housing cost burden	20.32593353
Low-inc renter severe housing cost burden	11.6514821
Uncrowded housing	52.91928654
Health Outcomes	—
Insured adults	19.59450789
Arthritis	13.5
Asthma ER Admissions	5.9
High Blood Pressure	4.8
Cancer (excluding skin)	11.3
Asthma	96.9
Coronary Heart Disease	0.6
Chronic Obstructive Pulmonary Disease	27.0
Diagnosed Diabetes	11.3
Life Expectancy at Birth	28.8
Cognitively Disabled	28.0
Physically Disabled	8.8
Heart Attack ER Admissions	9.1
Mental Health Not Good	67.2
Chronic Kidney Disease	2.1

Obesity	37.0
Pedestrian Injuries	87.7
Physical Health Not Good	32.6
Stroke	2.9
Health Risk Behaviors	—
Binge Drinking	72.5
Current Smoker	70.0
No Leisure Time for Physical Activity	36.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	78.7
Elderly	24.7
English Speaking	84.0
Foreign-born	54.0
Outdoor Workers	37.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	4.0
Traffic Density	81.0
Traffic Access	47.8
Other Indices	—
Hardship	57.8
Other Decision Support	—
2016 Voting	35.9

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	93.0

Healthy Places Index Score for Project Location (b)	15.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	Wilmington Long Beach Carson

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

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Cannabis Retail Storefront Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Cannabis Retail Storefront
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	18.4
Location	33.96730762864685, -118.23928878078576
County	Los Angeles-South Coast
City	Unincorporated
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4209
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Strip Mall	1.00	1000sqft	0.80	4,679	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.31	0.29	0.11	1.39	< 0.005	< 0.005	0.25	0.26	< 0.005	0.06	0.07	0.71	337	337	0.09	0.01	0.98	344
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.27	0.25	0.12	1.10	< 0.005	< 0.005	0.25	0.26	< 0.005	0.06	0.07	0.71	324	325	0.09	0.01	0.05	331
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.28	0.26	0.11	1.17	< 0.005	< 0.005	0.23	0.23	< 0.005	0.06	0.06	0.71	305	305	0.09	0.01	0.41	312
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.05	0.05	0.02	0.21	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	0.12	50.5	50.6	0.01	< 0.005	0.07	51.6

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.16	0.14	0.10	1.18	< 0.005	< 0.005	0.25	0.26	< 0.005	0.06	0.07	—	283	283	0.01	0.01	0.95	288

Area	0.15	0.15	< 0.005	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.84	0.84	< 0.005	< 0.005	—	0.84
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	52.6	52.6	< 0.005	< 0.005	—	52.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.14	0.48	0.62	0.01	< 0.005	—	1.09
Waste	—	—	—	—	—	—	—	—	—	—	—	0.57	0.00	0.57	0.06	0.00	—	1.98
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	0.31	0.29	0.11	1.39	< 0.005	< 0.005	0.25	0.26	< 0.005	0.06	0.07	0.71	337	337	0.09	0.01	0.98	344
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.16	0.14	0.11	1.09	< 0.005	< 0.005	0.25	0.26	< 0.005	0.06	0.07	—	271	271	0.01	0.01	0.02	275
Area	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	52.6	52.6	< 0.005	< 0.005	—	52.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.14	0.48	0.62	0.01	< 0.005	—	1.09
Waste	—	—	—	—	—	—	—	—	—	—	—	0.57	0.00	0.57	0.06	0.00	—	1.98
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	0.27	0.25	0.12	1.10	< 0.005	< 0.005	0.25	0.26	< 0.005	0.06	0.07	0.71	324	325	0.09	0.01	0.05	331
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.14	0.13	0.10	1.03	< 0.005	< 0.005	0.23	0.23	< 0.005	0.06	0.06	—	251	251	0.01	0.01	0.38	255
Area	0.14	0.13	< 0.005	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.57	0.57	< 0.005	< 0.005	—	0.58
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	52.6	52.6	< 0.005	< 0.005	—	52.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.14	0.48	0.62	0.01	< 0.005	—	1.09
Waste	—	—	—	—	—	—	—	—	—	—	—	0.57	0.00	0.57	0.06	0.00	—	1.98
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	0.28	0.26	0.11	1.17	< 0.005	< 0.005	0.23	0.23	< 0.005	0.06	0.06	0.71	305	305	0.09	0.01	0.41	312
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.03	0.02	0.02	0.19	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	41.6	41.6	< 0.005	< 0.005	0.06	42.2
Area	0.02	0.02	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.09	0.09	< 0.005	< 0.005	—	0.10
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.70	8.70	< 0.005	< 0.005	—	8.75

Water	—	—	—	—	—	—	—	—	—	—	—	0.02	0.08	0.10	< 0.005	< 0.005	—	0.18
Waste	—	—	—	—	—	—	—	—	—	—	—	0.09	0.00	0.09	0.01	0.00	—	0.33
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	0.05	0.05	0.02	0.21	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	0.12	50.5	50.6	0.01	< 0.005	0.07	51.6

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	0.16	0.14	0.10	1.18	< 0.005	< 0.005	0.25	0.26	< 0.005	0.06	0.07	—	283	283	0.01	0.01	0.95	288
Total	0.16	0.14	0.10	1.18	< 0.005	< 0.005	0.25	0.26	< 0.005	0.06	0.07	—	283	283	0.01	0.01	0.95	288
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	0.16	0.14	0.11	1.09	< 0.005	< 0.005	0.25	0.26	< 0.005	0.06	0.07	—	271	271	0.01	0.01	0.02	275
Total	0.16	0.14	0.11	1.09	< 0.005	< 0.005	0.25	0.26	< 0.005	0.06	0.07	—	271	271	0.01	0.01	0.02	275
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	0.03	0.02	0.02	0.19	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	41.6	41.6	< 0.005	< 0.005	0.06	42.2
Total	0.03	0.02	0.02	0.19	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	41.6	41.6	< 0.005	< 0.005	0.06	42.2

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	43.6	43.6	< 0.005	< 0.005	—	43.8
Total	—	—	—	—	—	—	—	—	—	—	—	—	43.6	43.6	< 0.005	< 0.005	—	43.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	43.6	43.6	< 0.005	< 0.005	—	43.8
Total	—	—	—	—	—	—	—	—	—	—	—	—	43.6	43.6	< 0.005	< 0.005	—	43.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	7.22	7.22	< 0.005	< 0.005	—	7.26
Total	—	—	—	—	—	—	—	—	—	—	—	—	7.22	7.22	< 0.005	< 0.005	—	7.26

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.98	8.98	< 0.005	< 0.005	—	9.00
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.98	8.98	< 0.005	< 0.005	—	9.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.98	8.98	< 0.005	< 0.005	—	9.00
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.98	8.98	< 0.005	< 0.005	—	9.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.49	1.49	< 0.005	< 0.005	—	1.49
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.49	1.49	< 0.005	< 0.005	—	1.49

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.04	0.03	< 0.005	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.84	0.84	< 0.005	< 0.005	—	0.84
Total	0.15	0.15	< 0.005	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.84	0.84	< 0.005	< 0.005	—	0.84
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consum Products	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.11	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	< 0.005	< 0.005	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.09	0.09	< 0.005	< 0.005	—	0.10
Total	0.02	0.02	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.09	0.09	< 0.005	< 0.005	—	0.10

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.14	0.48	0.62	0.01	< 0.005	—	1.09
Total	—	—	—	—	—	—	—	—	—	—	—	0.14	0.48	0.62	0.01	< 0.005	—	1.09

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.14	0.48	0.62	0.01	< 0.005	—	1.09
Total	—	—	—	—	—	—	—	—	—	—	—	0.14	0.48	0.62	0.01	< 0.005	—	1.09
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.02	0.08	0.10	< 0.005	< 0.005	—	0.18
Total	—	—	—	—	—	—	—	—	—	—	—	0.02	0.08	0.10	< 0.005	< 0.005	—	0.18

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.57	0.00	0.57	0.06	0.00	—	1.98
Total	—	—	—	—	—	—	—	—	—	—	—	0.57	0.00	0.57	0.06	0.00	—	1.98
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.57	0.00	0.57	0.06	0.00	—	1.98
Total	—	—	—	—	—	—	—	—	—	—	—	0.57	0.00	0.57	0.06	0.00	—	1.98
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.09	0.00	0.09	0.01	0.00	—	0.33
Total	—	—	—	—	—	—	—	—	—	—	—	0.09	0.00	0.09	0.01	0.00	—	0.33

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	< 0.005	< 0.005

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Strip Mall	44.3	42.0	20.4	14,812	359	340	165	119,836

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	7,019	2,340	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Strip Mall	45,954	346	0.0330	0.0040	28,013

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Strip Mall	74,073	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Strip Mall	1.05	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	8.60	annual days of extreme heat
Extreme Precipitation	4.95	annual days with precipitation above 20 mm

Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2

Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	40.0
AQ-PM	84.0
AQ-DPM	52.3
Drinking Water	63.9
Lead Risk Housing	99.2
Pesticides	0.00
Toxic Releases	92.3
Traffic	43.4
Effect Indicators	—

CleanUp Sites	62.1
Groundwater	84.4
Haz Waste Facilities/Generators	94.1
Impaired Water Bodies	0.00
Solid Waste	22.1
Sensitive Population	—
Asthma	82.2
Cardio-vascular	95.1
Low Birth Weights	84.5
Socioeconomic Factor Indicators	—
Education	98.1
Housing	96.3
Linguistic	76.9
Poverty	89.5
Unemployment	86.8

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	10.9842166
Employed	20.92903888
Median HI	14.28204799
Education	—
Bachelor's or higher	11.13820095
High school enrollment	24.76581548
Preschool enrollment	52.4573335
Transportation	—

Auto Access	15.55241884
Active commuting	82.04799179
Social	—
2-parent households	38.23944566
Voting	12.48556397
Neighborhood	—
Alcohol availability	12.74220454
Park access	48.10727576
Retail density	53.0347748
Supermarket access	86.46220968
Tree canopy	34.90311818
Housing	—
Homeownership	24.80431156
Housing habitability	4.427049917
Low-inc homeowner severe housing cost burden	8.084178109
Low-inc renter severe housing cost burden	7.96868985
Uncrowded housing	6.108045682
Health Outcomes	—
Insured adults	14.70550494
Arthritis	0.0
Asthma ER Admissions	18.9
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	28.2

Cognitively Disabled	54.2
Physically Disabled	68.4
Heart Attack ER Admissions	14.2
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	86.5
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	9.0
Elderly	77.9
English Speaking	15.0
Foreign-born	76.4
Outdoor Workers	22.3
Climate Change Adaptive Capacity	—
Impervious Surface Cover	8.8
Traffic Density	65.2
Traffic Access	87.4
Other Indices	—
Hardship	98.0
Other Decision Support	—

2016 Voting	5.2

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	97.0
Healthy Places Index Score for Project Location (b)	14.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	SouthGate, FlorenceFirestone,

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Estimate average size for cannabis retail storefront in LA County

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APPENDIX E

VMT Analysis

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Fehr & Peers

VMT Analysis for Los Angeles County Cannabis Programmatic EIR

Prepared for:
WSP

Submitted on:
February 2026

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Introduction

Following voter approval of Measure C in November 2022, which authorizes the taxation of cannabis businesses operating in unincorporated areas, the Los Angeles County Board of Supervisors directed development of a consistent and comprehensive cannabis business licensing program. The Program involves adoption of zoning and regulatory amendments to Title 8 (Consumer Protection, Business and Wage Regulations) and Title 22 (Planning and Zoning) of the Los Angeles County Code (LACC) to establish where, how, and by whom cannabis businesses may operate. To evaluate the potential physical environmental impacts of the Program, the County is preparing a Programmatic Environmental Impact Report (EIR). As part of this analysis, a Vehicle Miles Traveled (VMT) assessment is required to evaluate potential transportation impacts associated with implementation of the Program.

Project Description

The proposed "Project" is the Los Angeles County Commercial Cannabis Business Licensing Program, a regulatory framework designed to establish clear standards for the location, permitting, operation, monitoring, and reporting of commercial cannabis activities ("the Program"). The purpose of the Program is to allow commercial cannabis businesses to operate legally while protecting surrounding communities from potential adverse effects.

Cannabis Business Types

The proposed Project would allow the cannabis business types described below, but restricted to existing, legally constructed, and permitted structures within eligible commercial, commercial-only mixed-use, industrial, and institutional zones.

- **Cultivation:** includes the planting, growing, and harvesting of cannabis plants, and nursery operations. Only indoor cultivation using artificial light is allowed.
- **Manufacturing:** includes the compounding, blending, processing, extracting, infusing, or otherwise making or preparing of a cannabis product. It includes two primary types based on the activities performed and the chemical(s) used for extraction and post-processing: **non-volatile manufacturing** and **volatile manufacturing**.
- **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.
- **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.
- **Retail:** offers direct sales of cannabis and cannabis products to consumers. It includes two primary types based on the activities performed and sales model.
    - **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** 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.

- **Microbusiness**: consists of at least three of the following small-scale cannabis activities at one location: 1) Indoor cultivation with a maximum canopy size smaller than 10,000 square feet; 2) Non-volatile manufacturing; 3) Distribution; 4) Storefront retail sales; and 5) Non-storefront retail sales.

Table 1 and **Table 2** summarized eligible zones corresponding to each allowable cannabis business types. As such, cannabis businesses would either: 1) occupy sites currently used by existing businesses, resulting in a change of use; or 2) establish operations in properties that are currently vacant but have been previously developed and occupied. The Program would not permit the development of new buildings or redevelopment of existing buildings to accommodate a proposed cannabis business.

Table 1. Allowable 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	–
Storefront Retail	Yes	Yes	Yes	Yes
Non-Storefront Retail (delivery)	Yes	Yes	Yes	Yes
Microbusinesses	–	–	Yes	–

Source: Los Angeles County.

Table 2. Allowable Cannabis Business Types in Industrial and 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
Storefront Retail	Yes	–	–	–
Non-Storefront Retail (delivery)	Yes	Yes	Yes	–
Microbusiness	Yes	Yes	Yes	–

Source: Los Angeles County.

Grouping

Based on the project's cannabis business type definitions and eligible zoning, Fehr & Peers consolidated the allowable business types into groups to distinguish primary trip purposes and potential VMT implications:

Group 1 – Cultivation, Manufacturing, and Testing

These uses do not include direct sales to consumers and generally do not operate as customer-facing destinations. Trip-making is expected to be dominated by employee commute trips, with additional, lower-frequency trips associated with goods movement and site services (e.g., deliveries, waste hauling, and maintenance).

Group 2 – Distribution, Storefront Retail, Non-storefront Retail, and Microbusiness

These uses involve transporting cannabis products between licensed businesses and/or selling products to consumers. In addition to employee commute trips, they are expected to generate customer/visitor trips (storefront retail), delivery-driver and delivery-vehicle trips (non-storefront retail), and inter-business transport trips (distribution). Microbusiness is included in this group because it may combine multiple activities, potentially including distribution and retail, thereby generating similar visitor and delivery trip patterns.

VMT Analysis

The County of Los Angeles has established transportation-based significance thresholds through the *Los Angeles County Transportation Impact Analysis Guidelines*[1] (July 2020, "Los Angeles County TIA Guidelines"). These guidelines outline the analysis methodologies, screening criteria, and thresholds of significance used by the County to identify potential VMT impacts pursuant to CEQA Guidelines Section 15064.3(b). In accordance with the Los Angeles County TIA Guidelines, a VMT screening is conducted as an initial step to assess whether a less-than-significant determination can be made without a full VMT analysis.

VMT Screening

The Los Angeles County TIA Guidelines provides thresholds to determine whether a project can be screened out of needing a VMT analysis. Since the Program isn't permitted on residential land use, it was evaluated against three different screening criteria per Section 3.1.2 of the Los Angeles County TIA Guidelines. The screening criteria used are detailed below:

- **Non-Retail Project Trip Generation Screening Criteria**: A non-retail project is considered a "small project" if it does not generate a net increase of 110 or more daily vehicle trips. This criterion can be used in conjunction with the project's location and average trip distance to determine whether a less-than-significant determination can be made.
- **Retail Project Site Plan Screening Criteria**: A project that contains a local serving retail use is assumed to have less-than-significant VMT impacts for the retail portion of the project. If the project does not contain retail uses that exceed 50,000 square feet of gross floor area,

[1] Los Angeles County Public Works, Transportation Impact Analysis Guidelines, July 2020

further analysis is not required and a less-than-significant determination can be made for the retail component of the project.

- **Proximity to Transit Based Screening Criteria**: If a project is located within a one-half mile radius of a major transit stop[2] or an existing stop along a high-quality transit corridor[3], then the following subsequent questions should be considered:
  - Does the project have a Floor Area Ratio less than 0.75?
  - Does the project provide more parking than required by the County Code?
  - Is the project inconsistent with the SCAG RTP/SCS[4]?
  - Does the project replace residential units set aside for lower income households with a smaller number of market-rate residential units?

  If the answer to all four questions is no, further analysis is not required, and a less-than-significant determination can be made.

Because some project details, such as location, size, and specific use of individual projects under the Cannabis Program, have not yet been defined, a project-level VMT analysis cannot be conducted for the full program at this time. Therefore, a programmatic level evaluation has been conducted and is presented below.

Program VMT Impact Analysis

This section provides a framework of applying the set of VMT screening criteria described above to proposed cannabis uses under the proposed Program. Commercial cannabis uses could be permitted within unincorporated areas of Los Angeles County. Because the individual sites for future cannabis businesses have not yet been identified, the specific locations and sizes of cannabis development remain unknown. Nevertheless, the following screening criteria may be applicable to cannabis uses under the Cannabis Program:

- **Projects Located in Transit Proximity Area** – applicable to all cannabis business types
- **Small Projects** – applicable to all cannabis business types except for storefront retail
- **Locally Serving Retail Projects** – applicable to storefront retail only

Application of these criteria to individual cannabis business permitted under the Program is discussed in the following sections.

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[2] CA Public Resource Code, §21064.3 defines major transit stop as follows:
- An existing rail or bus rapid transit station.
- A ferry terminal served by either a bus or rail transit service.
- The intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods. (This definition was amended from an interval of 15 minutes to 20 minutes as of January 2025.)

[3] CA Public Resource Code, §21155 defines high-quality transit corridor as: a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

[4] SCAG RTP/SCS – Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a long-range planning document updated every four years as required by federal and state regulations. The most recent version is Connect SoCal 2024. https://scag.ca.gov/connect-socal

Projects Located in Transit Proximity Area

A project located in a transit proximity area can be presumed to have a less-than-significant VMT impact, if it meets additional considerations recommended by Los Angeles County TIA Guidelines. For cannabis businesses located outside of a transit proximity area, the VMT could exceed the allowable thresholds identified by the County and could potentially result in a significant VMT impact. However, cannabis businesses that are not within the Proximity to Transit Based screening criterion could still potentially be found to have a less-than-significant VMT impact based on the Small Project or Locally Serving Retail Projects criteria, which are described in the subsequent sections. **Since the location of individual business under the Cannabis Program have not yet been identified, a less-than-significant determination cannot be made using this criterion.**

Small Projects

Projects anticipated to generate fewer than 110 average daily vehicle trips (ADT) may be evaluated using the Small Project Screening Criteria as one line of evidence in the VMT analysis. A less-than-significant VMT impact determination may be supported where the project would not be expected to generate longer-than-average trips (e.g., trips exceeding the neighborhood's or planning area's average trip length), based on project-specific characteristics and available data. This screening criteria is applicable to the Cannabis Program land use categories except for storefront retail.

Trip generation estimates for the Cannabis Program activities were developed using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 12th Edition (August 2025) as the primary data source, supplemented by other published sources where ITE data are not available. Consistent with standard methodology, vehicle trip rates are expressed in terms of average daily trips per 1,000 square feet (ksf) of gross floor area (GFA) or per acre, depending on the land use type.

The following land use groups and associated trip generation rates can be used to estimate the trip generation for various cannabis business types:

Group 1 – Cultivation, Manufacturing, and Testing

- **Cultivation:** The ITE Trip Generation Manual does not provide a daily trip rate for cultivation uses. Therefore, alternative sources of trip generation rates were explored based on prior studies. A rate of 67.3 daily trips per acre for "Indoor Cultivation"[5] was applied to the proposed cultivation uses, which aligns with the proposed project's restriction to indoor operations. This rate was converted to 1.54 trips per 1,000 square feet using the formula: 67.3 trips per acre ÷ 43.56 (thousand square feet per acre).
- **Manufacturing**: ITE Trip Generation Manual "Manufacturing" (Land Use 140) daily trip rate of 4.27 per 1,000 square feet of gross area was used for both Non-volatile Manufacturing and Volatile Manufacturing.
- **Testing**: ITE Trip Generation Manual does not provide a daily trip rate for "Testing" land uses. The "Research and Development Center" category (Land Use 760), which involves similar analytical and laboratory activities, was applied to for cannabis testing businesses. Therefore, a trip generation rate of 9.47 daily trips per 1,000 square feet of gross area was applied.

[5] County of Santa Barbara, Final Environmental Impact Report (EIR) for the Cannabis Land Use Ordinance and Licensing Program, December 2017

Group 2 – Distribution, Storefront Retail, Non-storefront Retail, and Microbusiness

- **Distribution**: ITE Trip Generation Manual does not provide a specific daily trip rate for "Distribution" land uses. The "Warehouse" category (Land Use 150), which includes distribution- and storage-related activities, was applied to cannabis distribution businesses. Accordingly, a trip generation rate of 1.38 daily trips per 1,000 square feet of gross area was used.
- **Retail (Storefront and Non-storefront)**: ITE Trip Generation Manual defines "Cannabis Dispensary" (Land Use 882) as a standalone facility where cannabis is sold to patients or retail consumers in a legal manner, with an average daily trip rate of 227.76 per 1,000 square feet of gross area. However, ITE does not specify whether this land use represents storefront or non-storefront (delivery-only) operations. For a non-storefront retail, delivery-only model, trip generation is driven primarily by delivery activity and varies by the operator's business plan. Thus, it is more appropriate to define a project's maximum size by total daily vehicle trips, including delivery and employee commute trips, and to evaluate whether that total remains below 110 ADT.
- **Microbusiness**: The proposed Program would allow cannabis microbusinesses that consist of at least three of the following small-scale cannabis activities at one location: 1) Indoor cultivation with a maximum canopy size smaller than 10,000 square feet; 2) Non-volatile manufacturing; 3) Distribution; 4) Storefront retail sales; 5) Non-storefront retail sales. The daily trip rates listed above should be considered for Microbusiness on a case-by-case basis.

Trip Generation Estimates

Under the proposed program, commercial cannabis activities would only be allowed in existing, legally constructed, and permitted structures located in eligible commercial, commercial-only mixed-use, industrial, and institutional zones. The *Project Description* section listed eligible existing land use types corresponding to each cannabis business types, as shown previously in **Table 1** and **Table 2**.

For projects that would occupy currently vacant properties, **Table 3** outlines the maximum allowable size for Group 1 and Group 2 cannabis business types that would generate fewer than 110 ADT.

For individual projects that propose to replace existing businesses currently operating on these sites, a trip credit may be applied to account for the travel demand that would be eliminated by the removal of the existing use. **Table 4** presents the daily trip generation rates for both the existing eligible land use types as well as the proposed Group 1 and Group 2 cannabis business types.

Table 3. Project Maximum Allowable Size per the Small Project Screening Criteria, without Existing Trip Credit

Group	Cannabis Business Type	Maximum Project Size	Unit [a]	Daily Trip Generation Rate
Group 1	Cultivation	71.4	KSF	1.54
	Non-volatile manufacturing	25.8	KSF	4.27
	Volatile manufacturing	25.8	KSF	4.27
	Testing	11.6	KSF	9.47
Group 2	Distribution	79.7	KSF	1.38
	Non-storefront retail [b]	0.5	KSF	227.76
		110	Total daily vehicle trips	N/A
	Microbusiness	Refer to the rates above on a case-by-case basis		

Note:
[a] KSF = 1,000 square feet
[b] The maximum allowable size per the Small Project Screening Criteria is applicable to non-storefront retail only. For storefront retail, please refer to the subsequent section of **Locally Serving Retail Projects**.

Table 4: Trip Generation Rates of Eligible Existing Land Use and Proposed Allowable Land Use

Proposed Allowable Cannabis Business Type					Existing Eligible Land Use			
Cannabis Business Licensing Type		ITE Land Use Code [a]	ITE Land Use Category	Daily Trip Rate (trips/ksf)	Eligible Existing Land Use Type	ITE Land Use Code [a]	ITE Land Use Category	Daily Trip Rate (trips/ksf)
Group 1	Cultivation	190	Cannabis Cultivation and Processing	1.54 [b]	Industrial	110	General Light Industrial	3.6
	Non-volatile manufacturing	140	Manufacturing	4.27	Industrial	140	Manufacturing	4.27
						110	General Light Industrial	3.6
					Commercial	822	Strip Retail Plaza (<40k)	54.45
	Volatile manufacturing	140	Manufacturing	4.27	Industrial	140	Manufacturing	4.27
						110	General Light Industrial	3.6
	Testing	760	Research and Development Center	9.47	Commercial	822	Strip Retail Plaza (<40k)	54.45
					Industrial	110	General Light Industrial	3.6
						140	Manufacturing	4.27
					Institutional	730	Government Office Building	22.59
						760	Research and Development Center	9.47
						630	Walk-In Clinic	37.6
Group 2	Distribution	150	Warehouse	1.38	Industrial	150	Warehouse	1.38
						140	Manufacturing	4.27
						110	General Light Industrial	3.6
					Commercial	822	Strip Retail Plaza (<40k)	54.45
	Non-storefront retail	882	Cannabis Dispensary [c]	227.76 trips/ksf or 110 total daily vehicle trips	Commercial	822	Strip Retail Plaza (<40k)	54.45
					Industrial	110	General Light Industrial	3.6
						140	Manufacturing	4.27
	Microbusiness	Refer to the rates above on a case-by-case basis [d]			Refer to the rates above on a case-by-case basis [d]			

Note:

[a] Source: Institute of Transportation Engineers (ITE) Trip Generation Manual, 12th Edition, August 2025.

[b] The daily trip rate for cultivation is not provided in the ITE Trip Generation Manual. Therefore, it was sourced from the County of Santa Barbara FEIR, which reports 67.3 trips per acre for "Indoor Cultivation." This rate was converted to 1.54 trips per 1,000 square feet using the formula: 67.3 trips per acre ÷ 43.56 (thousand square feet per acre).

[c] ITE definition: A cannabis dispensary is a stand-alone facility where cannabis is sold to patients or retail consumers in a legal manner. ITE defines “Cannabis Dispensary” with an average daily rate of 227.76 trips per 1,000 sf GFA, but does not distinguish storefront versus delivery-only operations. For non-storefront retail, trips are primarily delivery-driven and vary by operations; therefore, project size is more appropriately screened using total daily vehicle trips (delivery + employee commute), evaluated against the 110 ADT threshold.

[d] The proposed Project would allow cannabis microbusinesses that consist of at least three of the following small-scale cannabis activities at one location: 1) Indoor cultivation with a maximum canopy size smaller than 10,000 square feet; 2) Non-volatile manufacturing; 3) Distribution; 4) Storefront retail sales; 5) Non-storefront retail sales.

Trip Distance

Trip distance is a location-based metric that, together with trip generation estimates, helps evaluate potential VMT impacts. It reflects where cannabis businesses are located and the typical origins and destinations of employee, customer, and delivery trips.

For Group 1 uses (Cultivation, Manufacturing, and Testing), trip distance is driven primarily by employee commute trips. These businesses are more likely to result in a less-than-significant VMT impact when commute distances are shorter and/or when a higher share of employees use non-single-occupant vehicle modes (e.g., carpool, transit, biking, or walking).

For Group 2 uses (Distribution, Storefront Retail, Non-storefront Retail, and Microbusiness), trip distance reflects a combination of employee commute trips and product movement/customer access trips, including deliveries. As a result, Group 2 uses can generate higher VMT than Group 1 because they add trip-making beyond employee travel and may involve longer or more frequent vehicle trips across a broader service area.

Because individual cannabis business locations, operating characteristics, and intensity are not yet defined, trip distances cannot be reliably estimated at this time. Likewise, individual project sizes and maximum trip generation rates cannot be reliably determined. Therefore, **the Small Project screening criterion cannot support a less-than-significant VMT determination for the Program.**

Locally Serving Retail Projects

The Cannabis Program would allow for the establishment of two types of commercial cannabis retail operations in select areas of unincorporated Los Angeles County: cannabis storefront and non-storefront retail (delivery-only). Non-storefront retail operations, which exclusively provide delivery services, are not classified as locally serving and therefore would not qualify under this criterion.

Based on the Los Angeles County TIA Guidelines, retail projects under 50,000 square feet are generally presumed to be locally serving, and therefore result in a less-than-significant VMT impact. Storefront cannabis retail businesses within this size threshold would typically qualify under this criterion. However, storefront cannabis businesses that exceed 50,000 square feet may not be presumed locally serving, and could potentially result in a significant VMT impact if their VMT level exceeds the County's thresholds. **Since individual storefront retail sizes have not yet been identified, a less-than-significant determination cannot be made using this criterion.**

Determining Significance

While some individual sites may meet the screening criteria and result in a less-than-significant VMT impact, not all future projects are guaranteed to do so. If a proposed commercial cannabis business does not meet any screening criteria, its VMT may exceed the County's impact threshold, potentially resulting in a significant impact. Under the proposed Program, individual businesses may be located outside a transit proximity area, may exceed the maximum levels associated with the 110-ADT small project threshold, and storefront retail may exceed the 50,000-square-foot locally serving threshold; in addition, project-specific trip distances cannot be determined at this time. **Therefore, the VMT impact under the proposed Program would be potentially significant.**

Mitigation Measures

VMT mitigation cannot be quantified without project-specific locations and operating characteristics. However, applicable transportation demand management (TDM) strategies from the Los Angeles County TIA Guidelines (**Table 5**) may be considered to reduce VMT, primarily by targeting employee commute trips. These measures are generally less effective for delivery, visitor, and inter-business transport trips. Because the Program includes uses that generate customer/visitor, delivery, and distribution trips, VMT reduction strategies are not readily available and reducing impacts to a less-than-significant level would be infeasible.

For example, pedestrian network improvements (e.g., sidewalks) required as a condition of approval would likely be limited in extent (often to the project frontage) and may not create a connected, convenient walking network that would meaningfully shift travel behavior. In addition, CAPCOA's quantified effectiveness for this measure depends on the incremental increase in sidewalk coverage; where sidewalks already exist or few improvements are warranted, the VMT reduction would be minimal.

Therefore, the Program would result in a significant and unavoidable VMT impact.

Table 5. TDM Strategies Appropriate for Commercial Cannabis Businesses

Category [a]	Measure [a] and *Description* [b]	Maximum VMT Reduction [b]
Commute Trip Reduction	**Commute Trip Reduction (CTR) Programs with Required Monitoring** *This measure will implement a mandatory CTR program with employers. CRT programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT.*	26.0% [c]
	Ride Sharing Programs *This measure will implement a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips and VMT.*	8.0%
	Subsidized or Discounted Transit Programs *This measure will provide subsidized or discounted, or free transit passes for employees. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT.*	5.5%

Category [a]	Measure [a] and *Description* [b]	Maximum VMT Reduction [b]
Neighborhood/ Site Enhancement	**Pedestrian Network Improvements** *This measure will increase the sidewalk coverage to improve pedestrian access. Providing sidewalks and an enhanced pedestrian network encourages people to walk instead of drive. This mode shift results in a reduction in VMT.*	6.4%

Notes:
[a] Source: Section 3.1.5 of Los Angeles County TIA Guidelines, July 2020
[b] Source: California Air Pollution Control Offices Association (CAPCOA), *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, December 2021.
[c] CTR Programs with Required Monitoring must include all other elements described for the voluntary program plus include mandatory trip reduction requirements (including penalties for non-compliance) and regular monitoring and reporting to ensure the calculated VMT reduction matches the observed VMT reduction. The CAPCOA Handbook provides detailed implementation requirements.

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