

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

LOS ANGELES COUNTY COMMERCIAL CANNABIS BUSINESS LICENSING PROGRAM

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PREPARED FOR:



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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 ₂ H ₃ Cl	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

Acronyms and Abbreviations

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 ₂ e	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 ₂ S	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 International Airport

Acronyms and Abbreviations

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 ₂ O	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-SO ₄ ²⁻	sulfates
ZEV	zero emission vehicle

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 energy resources, during	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
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 environment due to the routine transport, use, or disposal of hazardous materials.	Less than Significant Impact	No mitigation required.	Less than Significant

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
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 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	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
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
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	Less than Significant Impact	No mitigation required.	Less than Significant

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.			
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: <i>Commuter Trip Reduction (CTR) Programs with Required Monitoring</i> This measure would implement a mandatory CTR program with employers. CTR programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing VMT. <i>Ridesharing Programs</i> 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.	Significant and Unavoidable

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

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
		<i>Subsidized or Discounted Transit Programs</i> 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. <i>Pedestrian Network Improvements</i> 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
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	Less than Significant Impact	No mitigation required.	Less than Significant

Impact	Impact Classification	Mitigation Measure (MM)	Residual Impacts
facilities, the construction of which could cause significant environmental effects.			
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 impair the attainment of solid waste reduction goals.	Less than Significant Impact	No mitigation required.	Less than Significant
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

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, <i>Utilities / Service Systems</i> .

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 dcbalacounty.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~~ <u>has prepared the</u> 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. <u>In total, 12 written comment letters and 19 oral comments were received from agencies, non-governmental organizations, community groups, and the public on the Draft Program EIR.</u> 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, Introduction to the Final EIR (CEQA Guidelines § 15088), provides an overview of the Draft Program EIR review process, requirements for preparation of the Final Program EIR, a description of how the Final Program EIR will be used in the decision-making process, and a summary of the corrections and additions made to the Draft Program EIR.

Chapter 9, Response to Comments (CEQA Guidelines § 15088). Provides a copy of written responses to all written and oral comments received from agencies, non-governmental organizations, community groups, and the public on the Draft Program EIR.

Chapter & 10, 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.

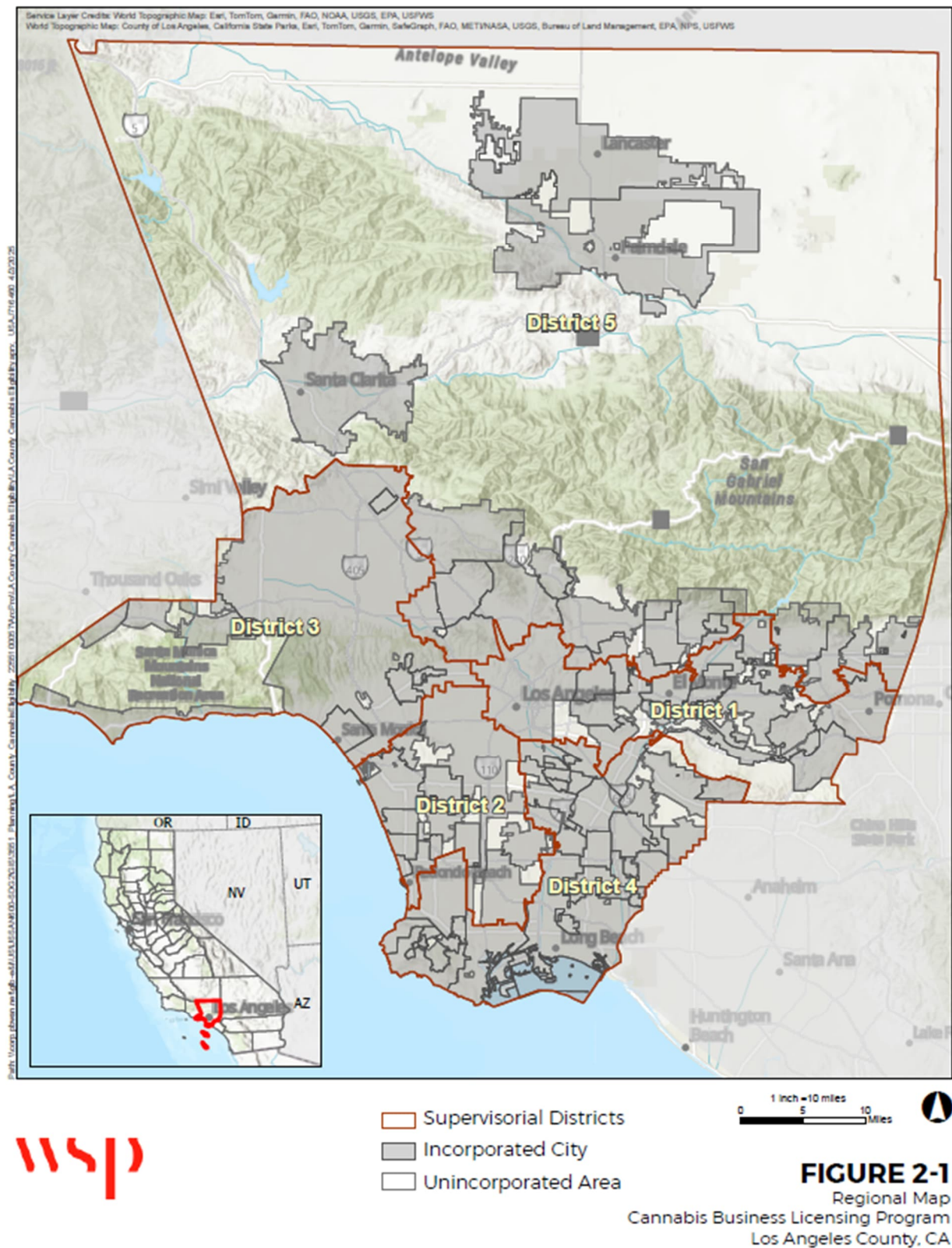
2.2 EXISTING SETTING

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



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 and 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 significant 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 unincorporated 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 Dominguez, 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 unincorporated 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 County 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. Approximately 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 Malibu 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-Windsor Hills, Marina del Rey, Del Rey, Franklin Canyon, the westside of the City of Los Angeles, and other small cities 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 unincorporated 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.

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).



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.

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

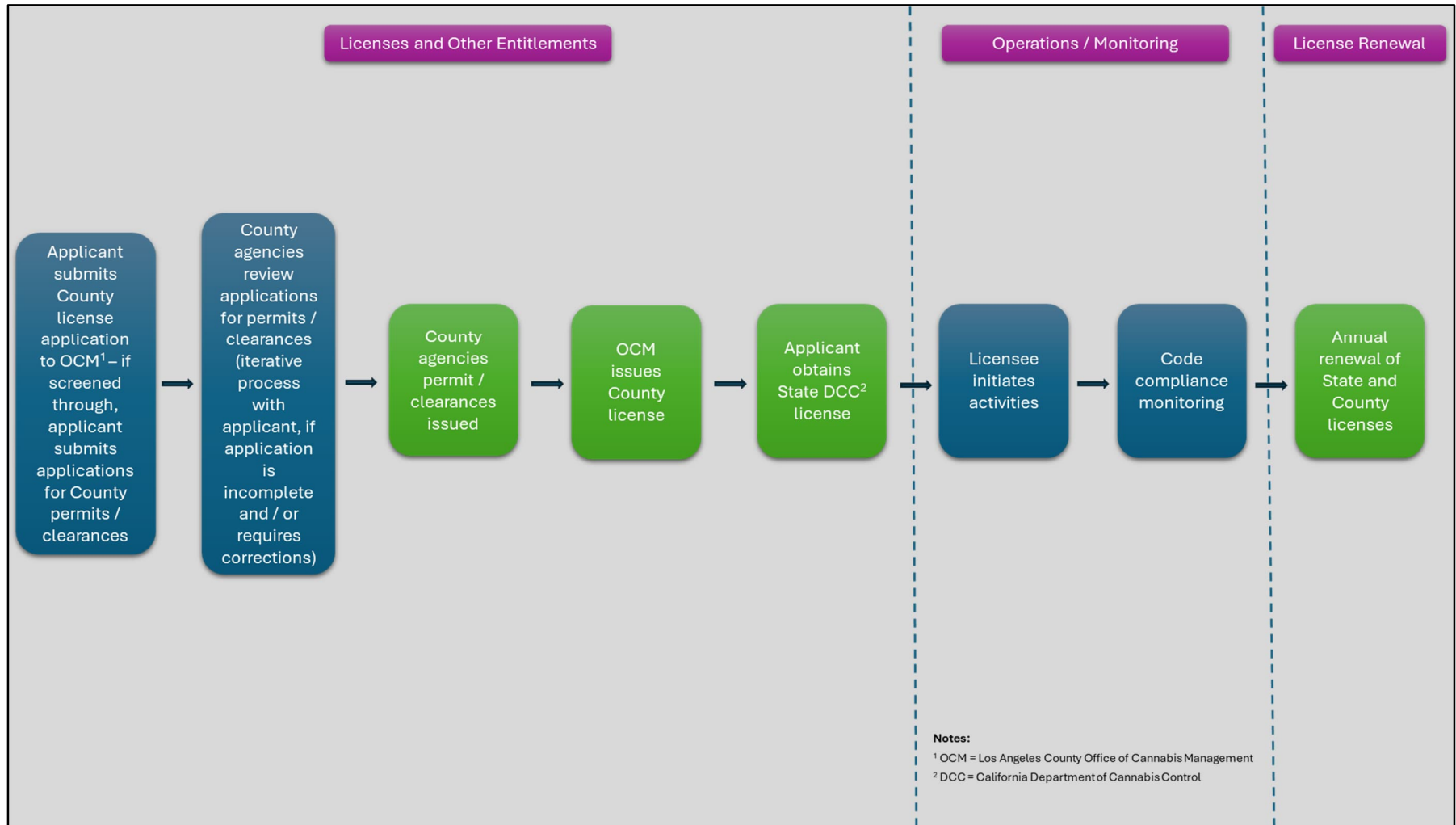
cannabis business licenses and land use permits could be issued only to cannabis businesses proposed on sites that are zoned appropriately for cannabis business per LACC Title 22 and meet all County requirements, including locational, structural, and operational requirements, as described below for each 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. Future cannabis applicants are also responsible for preparing and submitting required project-specific documentation, such as waste management plans and operational materials to the appropriate reviewing agencies, including the State DCC, as part of the State licensing process.

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.

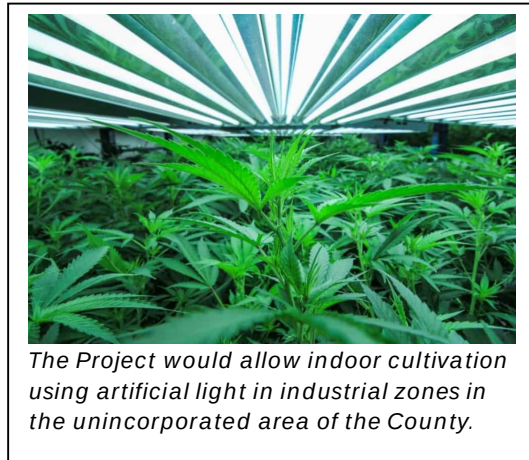
2.3.3 Proposed Allowable Cannabis Business Types

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 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 (CO₂), 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 CO₂ 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.

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



Example of drying racks used during cannabis processing.

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. Storefront retailers can also deliver cannabis and cannabis products consistent with State DCC regulations (State DCC 2026).
- 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.

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.



Example of packaging used for cannabis products.

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 3 rd 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

Com mercial Cannabis Business Activity	Marina del Rey Specific Plan Zones		New hall Ranch Specific Plan Zones				Northlake Specific Plan Zones		
	Visitor Serving / Convenience Com mercial (VS/CC)	Office (O)	Visitor Serving (VS)	Com mercial (C)	Business Park (BP)	Mixed-Use (MU)	Community Com mercial (C-C)	Highway Com mercial (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

Com mercial 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. Further, since 2018, California Department of Fish and Wildlife (CDFW) scientific staff have assisted in over 300 warrant operations of cannabis cultivation sites in the Antelope Valley region of the county, covering 2,000 acres, and have documented more than 350 environmental violations of the California Fish and Game Code (CDFW, email communication, 2026). 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

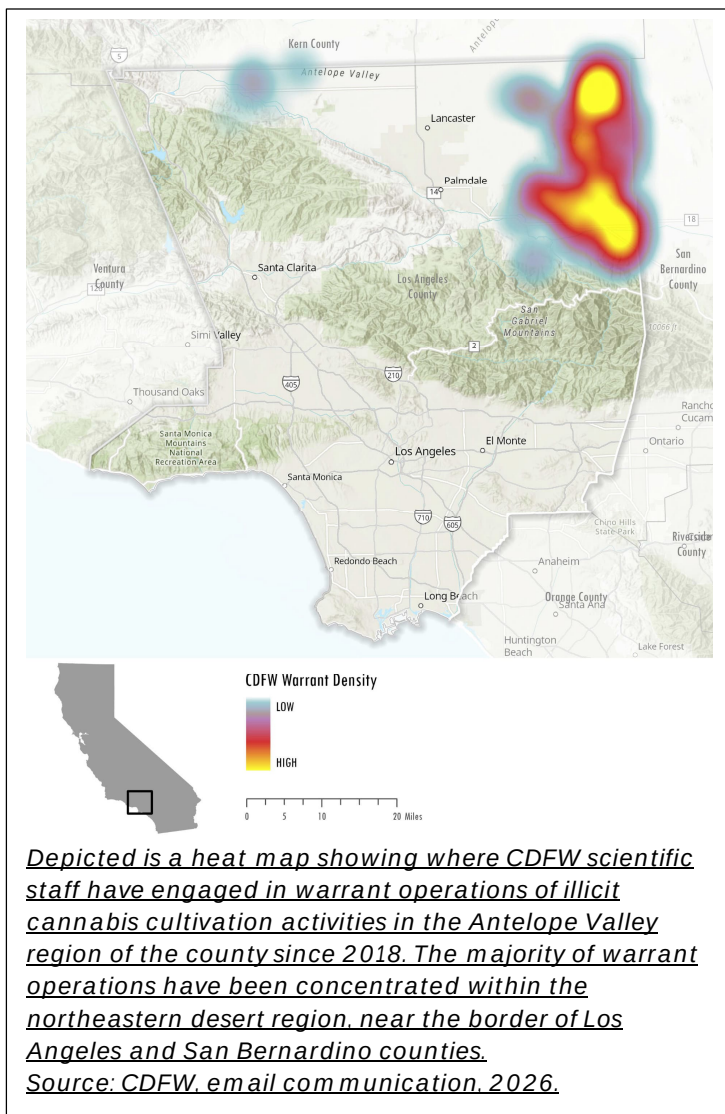


exhibit substantial paleontological, archaeological, or tribal cultural resources. The eligible zones can be further described as follows:

- 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 CO₂ 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 (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), respirable particulate matter 10 microns or less in diameter (PM₁₀), 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/m ³)	--

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/m³ = micrograms per cubic meter; mg/m³ = milligrams per cubic meter.

Federal and State Criteria Air Pollutants

Ozone (O₃) is a colorless gas with a sharp odor and is a highly reactive form of oxygen. High O₃ 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 O₃, are automobile exhaust and industrial sources. Some mixing of stratospheric O₃ downward through the troposphere to the Earth's surface does occur; however, the extent of O₃ transport is limited.

The propensity of O₃ to react with organic materials makes it damaging to living cells and causes negative health effects. O₃ 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 O₃ effects (USEPA 2025b).

Respirable and Fine Particulate Matter (PM₁₀ 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 PM₁₀ 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 SO₂, NO_x, and VOC.

Respirable particles (particles less than 10 microns in diameter, denoted as PM₁₀) 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 PM₁₀ 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 (CH₄). 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 (NO₂) 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 (N₂) 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 NO₂. The two gases, NO and NO₂, are referred to collectively as NO_x. In the presence of sunlight, atmospheric NO₂ reacts and splits to form a NO molecule and an oxygen atom. The oxygen atom can react further to form O₃, 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 NO₂ 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 NO₂. 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 NO₂ exposures and cardiopulmonary mortality, decreased lung function, respiratory symptoms, and emergency room asthma visits (USEPA 2024a).

Sulfur Dioxide (SO₂) 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 SO₂ include coal and oil used in power plants and industries. Brief exposure to low levels of SO₂ can result in airway constriction in some asthmatics. All asthmatics are sensitive to the effects of SO₂. 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 SO₂. In contrast, healthy individuals do not exhibit similar acute responses, even after exposure to higher concentrations of SO₂ (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-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 $\text{PM}_{2.5}$. 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 ($\text{C}_2\text{H}_3\text{Cl}$) 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 NO₂ 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 NO₂ 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. NO₂ 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 Valley 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 $\geq$ 0.09 ppm	104	91	88	76
State 8-Hour $\geq$ 0.07 ppm	145	133	126	115
Federal 8-Hour $\geq$ 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 $\geq$ 150 $\mu\text{g}/\text{m}^3$	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 $\geq 50 \mu\text{g}/\text{m}^3$	173	179	168	158
Max 24-Hour Concentration ($\mu\text{g}/\text{m}^3$)	124	132	177	186
Fine Particulates ($\text{PM}_{2.5}$)				
Federal 24-Hour $\geq 35 \mu\text{g}/\text{m}^3$	13	20	9	4
Max 24-Hour Concentration ($\mu\text{g}/\text{m}^3$)	53.1	102.1	53.8	53.8
Lead (Pb)				
Max Monthly Average Concentration ($\mu\text{g}/\text{m}^3$)	0.016	0.013	0.010	0.012
Max 3-Month Rolling Average Concentration ($\mu\text{g}/\text{m}^3$)	0.011	0.012	0.008	0.008
Sulfate				
Max 24-Hour Concentration ($\mu\text{g}/\text{m}^3$)	5.2	4.8	9.6	26.8

Sources: SCAQMD 2020-2023.

Notes: $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter; $\text{PM}_{2.5}$ = 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} , $\text{PM}_{2.5}$, 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 $\geq 0.09 \text{ ppm}$	45	43	38	33
State 8-Hour $\geq 0.07 \text{ ppm}$	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 $\mu\text{g}/\text{m}^3$	1	1	0	--
State 24-Hour ≥ 50 $\mu\text{g}/\text{m}^3$	42	21	9	--
Max 24-Hour Concentration ($\mu\text{g}/\text{m}^3$)	192.3	411.2	76.3	105.2
Fine Particulates (PM _{2.5})				
Federal 24-Hour ≥ 35 $\mu\text{g}/\text{m}^3$	24	14	0	0
Max 24-Hour Concentration ($\mu\text{g}/\text{m}^3$)	74.8	35.8	15.2	12.5

Sources: CARB 2020-2023.

Notes: $\mu\text{g}/\text{m}^3$ = 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: O₃, NO₂, CO, SO₂, PM₁₀, 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 (PM₁₀ and PM_{2.5}), and CO from gasoline fueled light and medium duty vehicles.

California Code of Regulations

Title 8, §1529 - 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.

Title 17, Division 1, Chapter 8 – Lead-Based Paint

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/cm²) 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.”

Title 4, §15020 – Cultivation License Limited Operations Status

(e) The Department shall verify that all requirements to place the cultivation license in Limited Operations Status have been met. If all requirements have been met, the Department shall notify the cultivation licensee in writing that the requirements for the requested Limited Operations Status have been met.

Title 4, §16304 – General Environmental Protection Measures

(a) All licensed cultivators shall comply with all of the following environmental protection measures:

(4) Requirements for generators pursuant to section 16306:

Title 4, §16305: Renewable Energy Requirements

(a) Beginning January 1, 2023, all holders of indoor, tier 2 mixed-light license types of any size, and all holders of nursery licenses using indoor or tier 2 mixed-light techniques shall ensure that electrical power used for commercial cannabis activity 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 (commencing with section 399.11) of the Public Utilities Code.

(b) If a licensed cultivator's average weighted greenhouse gas emission intensity, as calculated and reported upon license renewal pursuant to section 15020, 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. The carbon offsets shall be purchased from one or more of the following recognized voluntary carbon registries:

(1) American Carbon Registry;

(2) Climate Action Reserve; or

(3) Verified Carbon Standard.

Title 4, §16306 – Generator Requirements

(a) For the purposes of this section, “generator” is defined as a stationary or portable compression ignition engine pursuant to title 17, division 3, chapter 1, subchapter 7.5, section 93115.4 of the California Code of Regulations.

(b) Licensees using generators rated at 50 horsepower and greater shall demonstrate compliance with either, as applicable, the Airborne Toxic Control Measure for stationary engines pursuant to title 17, division 3, chapter 1, subchapter 7.5, sections 93115 through 93115.15 of the California Code of Regulations, or the Airborne Toxic Control Measure for portable engines pursuant to title 17, division 3, chapter 1, subchapter 7.5, sections 93116 through 93116.5 of the California Code of Regulations. Compliance shall be demonstrated by providing a copy of one of the following to the department upon request:

(1) For portable engines, a Portable Equipment Registration Certificate provided by the California Air Resources Board; or

(2) For portable or stationary engines, a Permit to Operate, or other proof of engine registration, obtained from the Local Air District with jurisdiction over the licensed premises

(c) Licensees using generators rated below 50 horsepower shall comply with the following by 2023:

(1) Either (A) or (B):

(A) Meet the “emergency definition for portable engines in title 17, division 3, chapter 1, subchapter 7.5, sections 93116.2(a)(12) of the California Code of

Regulations, or the “emergency use” definition for stationary engines in title 17, division 3, chapter 1, subchapter 7.5, section 93115.4(a)(30); or

(B) Operate 80 hours or less in a calendar year; and

(2) Either (A) or (B):

(A) Meet Tier 3 with Level 3 diesel particulate filter requirements pursuant to title 13, division 3, chapter 14, sections 2700 through 2711 of the California Code of Regulations;

(B) Meet Tier 4, or current engines requirements if more stringent, pursuant to title 40, chapter 1, subchapter U, part 1039, subpart B, section 1039.101 of the Code of Federal Regulations.

(d) All generators shall be equipped with non-resettable hour-meters. If a generator does not come equipped with a non-resettable hour-meter an after-market non-resettable hour-meter shall be installed.

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 O₃ 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 O₃ 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 O₃ 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
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 ₂ S)	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.

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.

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.

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., 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.

³ See Footnotes 1 and 2, above.

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%
- <i>Biomass & Biowaste</i>	0.1%	0%	2.1%
- <i>Geothermal</i>	5.2%	0%	4.8%
- <i>Eligible Hydroelectric</i>	0.7%	0%	1.8%
- <i>Solar</i>	19.8%	100%	17.0%
- <i>Wind</i>	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 (CO₂) 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 CO₂ 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 Code of Regulations

The following requirements are included in the State Department of Cannabis Control (DCC) regulations, California Code of Regulations (CCR), Title 4, Division 19, Chapter 1 and pertain to cultivation sites.

§ 15006. Premises Diagram

(h) If the commercial cannabis business is seeking a license to conduct cultivation activities on the proposed premises, the following must be clearly identified on the premises diagram:

(6) For indoor and Mixed-light license type applications, a lighting diagram with the following information must be included:

(A) Location of all lights in the canopy area(s); and

(B) Maximum wattage, or wattage equivalent, of each light.

§ 15011. Additional Information

(a) A commercial cannabis business applying for a license to cultivate cannabis shall provide the following information:

(5) For indoor and mixed-light license types, identification of all power sources for cultivation activities, including, but not limited to, illumination, heating, cooling, and ventilation.

§ 15020. Renewal of License

(e) Beginning January 1, 2022, an application for renewal of a license to engage in commercial cannabis cultivation shall include the following records, for each power source indicated on the application for licensure for the previous annual licensed period:

(1) Total electricity supplied by local utility provider, name of local utility provider, and greenhouse gas emission intensity per kilowatt hour reported by the utility provider under section 398.4(c) of the Public Utilities Code for the most recent calendar year available at time of submission;

(2) Total electricity supplied by a zero net energy renewable source, as set forth in section 398.4(h)(5) of the Public Utilities Code, that is not part of a net metering or other utility benefit;

(3) Total electricity supplied from other unspecified sources, as defined in section 398.2(e) of the Public Utilities Code, and other onsite sources of generation not

reported to the local utility provider (e.g., generators, fuel cells) and the greenhouse gas emission intensity from these sources; and

(4) Average weighted greenhouse gas emission intensity considering all electricity use in subsections (e)(1)-(e)(3).

§ 16305. Renewable Energy Requirements

(a) Beginning January 1, 2023, all holders of indoor, tier 2 mixed-light license types of any size, and all holders of nursery licenses using indoor or tier 2 mixed-light techniques shall ensure that electrical power used for commercial cannabis activity 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 (commencing with section 399.11) of the Public Utilities Code.

(b) If a licensed cultivator's average weighted greenhouse gas emission intensity, as calculated and reported upon license renewal pursuant to section 15020, 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. The carbon offsets shall be purchased from one or more of the following recognized voluntary carbon registries:

(1) American Carbon Registry;

(2) Climate Action Reserve; or

(3) Verified Carbon Standard.

§ 16306. Generator Requirements

(a) For the purposes of this section, "generator" means a stationary or portable compression ignition engine, also known as a diesel engine, as defined in title 17, California Code of Regulations, section 93115.4.

(b) Licensed cultivators using generators rated at fifty (50) horsepower and greater shall demonstrate compliance with the Airborne Toxic Control Measure for stationary or portable engines, as applicable, established in title 17, California Code of Regulations, sections 93115-93116.5. Compliance shall be demonstrated by providing a copy of one of the following to the Department upon request:

(1) For portable engines, a Portable Equipment Registration Certificate provided by the California Air Resources Board; or

(2) For portable or stationary engines, a Permit to Operate or other proof of engine registration, obtained from the Local Air District with jurisdiction over the licensed premises.

(c) Licensed cultivators using generators rated below fifty (50) horsepower shall comply with the following by 2023:

(1) Either subsection (1)(A) or (1)(B):

(A) Meet the “emergency” definition for portable engines in title 17, California Code of Regulations, section 93116.2(a)(12), or the “emergency use” definition for stationary engines in title 17, California Code of Regulations, section 93115.4(a)(30); or

(B) Operate eighty (80) hours or less in a calendar year; and

(2) Either subsection (2)(A) or (2)(B):

(A) Meet Tier 3 with Level 3 diesel particulate filter requirements in title 13, California Code of Regulations, sections 2700-2711; or

(B) Meet Tier 4 requirements, or current engine requirements if more stringent, in title 40, Code of Federal Regulations, chapter I, subchapter U, part 1039, subpart B, section 1039.101.

(d) All generators used by licensed cultivators shall be equipped with non-resettable hour-meters. If a generator does not come equipped with a non-resettable hour-meter, an aftermarket non-resettable hour-meter shall be installed.

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

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.

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 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 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

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.

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, CO₂ 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.

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 (CO₂), methane (CH₄), and nitrous oxide (N₂O). Additionally, GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), 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 CO₂, CH₄, N₂O, and chlorofluorocarbons (CFCs). CO₂ 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 CO₂. CFCs have been banned in the U.S. and are artificially created, so these GHGs are not included in this analysis.

- CO₂. The production and absorption of CO₂ 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. CO₂ 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 CO₂ 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 CO₂ emissions is the

combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities (USEPA 2025b). CO₂ 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 CO₂ 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.)

- CH₄. CH₄ is emitted from a variety of both human-related and other sources. Anthropogenic sources of CH₄ 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 CH₄ emissions are related to human activities. Other sources of CH₄ include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and wildfires (USEPA 2025g).
- N₂O. Microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen, produce N₂O (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 N₂O. Concentrations of N₂O 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 CO₂, denoted as carbon dioxide equivalent (CO₂e). CO₂e 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 ₂ O)	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 (O₃), 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 CO₂ 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 CO₂ emissions (and thus substantial increases in atmospheric concentrations). In 2022, atmospheric CO₂ 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) CO₂e in 2019, approximately 12 percent (6.5 Gt CO₂e) higher than in 2010 and approximately 54 percent (21 Gt CO₂e) higher than in 1990 (IPCC 2023). The annual average during the decade 2010-2019 was 56 ± 6.0 Gt CO₂e, or 9.1 Gt CO₂e 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 CO₂ 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 CO₂ emissions from fossil fuels, according to a recent international analysis. The concentration of CO₂ 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 CO₂e. 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 CO₂e). 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, CO₂ 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, CO₂ 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 CO₂e, 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) CO₂e per person in 2001 to 5.08 MT CO₂e 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 ₂ e 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 CO₂e, 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 (MTCO ₂ e)	Percent of Total*	2018 Annual GHG Emissions (MTCO ₂ e)	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 (MTCO ₂ e)	Percent of Total*	2018 Annual GHG Emissions (MTCO ₂ e)	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-CO₂ 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 CO₂ 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 CO₂ 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 CO₂ 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 CO₂ 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 CO₂ 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 MTCO₂e per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO₂e 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 MTCO₂e 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 ₂ O	CO ₂ e
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 ₂ O	CO ₂ e
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 CO₂e. 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 CO₂e 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 SCAQMD's draft GHG significance threshold of 3,000 MT CO₂e/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, State 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 LRA¹; 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 (CO₂) 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 Code of Regulations

The following requirements are included in the State DCC regulations CCR, Title 4, Division 19, Chapter and pertain to cultivation sites.

§ 15006. Premises Diagram

(h) If the commercial cannabis business is seeking a license to conduct cultivation activities on the proposed premises, the following must be clearly identified on the premises diagram:

(5) For applicants for a Specialty Cottage, Specialty, Small, Medium, and Large license:

(C) Designated pesticide and other agricultural chemical storage area(s):

§ 15011. Additional Information

(a) A commercial cannabis business applying for a license to cultivate cannabis shall provide the following information:

(4) Evidence that the commercial cannabis business has conducted a hazardous materials record search of the EnviroStor database for the proposed premises. If hazardous sites were encountered, the applicant shall provide documentation of protocols implemented to protect employee health and safety.

(12) For all cultivator license types except processor, a signed attestation that states the commercial cannabis business shall contact the appropriate County Agricultural Commissioner regarding requirements for legal use of pesticides on cannabis prior to using any of the active ingredients or products included in the pest management plan and shall comply with all pesticide laws.

§ 16304. General Environmental Protection Measures

(a) All licensed cultivators shall comply with all of the following environmental protection measures:

(5) Requirements for pesticides pursuant to section 16307:

§ 16307. Pesticide Use Requirements

(a) Licensed cultivators shall comply with all applicable pesticide statutes and regulations enforced by the Department of Pesticide Regulation.

(b) For all pesticides that are exempt from registration requirements, licensed cultivators shall comply with all applicable pesticide statutes and regulations enforced by the Department of Pesticide Regulation and the following pesticide application and storage protocols:

(1) Comply with all pesticide label directions;

(2) Store chemicals in a secure building or shed to prevent access by wildlife;

(3) Contain any chemical leaks and immediately clean up any spills;

(4) Apply the minimum amount of product necessary to control the target pest;

(5) Prevent offsite drift;

(6) Do not apply pesticides when pollinators are present;

(7) Do not allow drift to flowering plants attractive to pollinators;

(8) Do not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;

(9) Do not apply pesticides when they may reach surface water or groundwater; and

(10) Only use properly labeled pesticides. If no label is available, consult the Department of Pesticide Regulation.

§ 16310. Pest Management Plan

(a) The licensed cultivator shall develop a pest management plan that includes:

(1) The product name and active ingredient(s) of all pesticides to be applied to cannabis; and

(2) Any integrated pest management protocols, including chemical, biological, and cultural methods, that will be used to prevent and control pests on the cultivation site.

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.

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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	Supervisory 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	Supervisory 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	Supervisory 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:

¹See <https://www.arcgis.com/apps/mapviewer/index.html?layerId=31&layers=26fe6b7e70ec41b285d9f5517abd611a> for a map of the Planning Areas.

²See <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 to 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, <i>Project Description</i> , 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, <i>Project Description</i> , 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.	

General Plan Policy	Consistency Analysis
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, <i>Air Quality</i> , 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

General Plan Policy	Consistency Analysis
	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, <i>Air Quality</i> , 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.

General Plan Policy	Consistency Analysis
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.	

General Plan Policy	Consistency Analysis
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

General Plan Policy	Consistency Analysis
	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

General Plan Policy	Consistency Analysis
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.	

General Plan Policy	Consistency Analysis
	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) <i>Cannabis Cultivation Policy</i> , 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.	

General Plan Policy	Consistency Analysis
	managed and disposed in accordance with State regulations at a permitted hazardous waste receipt / 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, <i>Energy</i> , 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, <i>Project Description</i> , 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

General Plan Policy	Consistency Analysis
	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, <i>Air Quality</i> .
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.	

General Plan Policy	Consistency Analysis
	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 policies 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): <i>Connect SoCal 2040 sets forth 30-year regional growth projections for Los Angeles County.</i>	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, <i>Energy</i>, Section 3.3, <i>Greenhouse Gas Emissions</i>, and Section 3.6, <i>Transportation</i>, 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, <i>Air Quality</i>, 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, <i>Energy</i> and Section 3.7, <i>Utilities/Service Systems</i>, 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, <i>Air Quality</i>, and Section 3.6, <i>Transportation</i>, 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 stop¹ 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 com mute 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 (storefront and 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: $67.3 \text{ trips per acre} \div 43.56 \text{ (1,000 square feet per acre)}$.
 - 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
					Com mercial	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	Com mercial	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
					Com mercial	822	Strip Retail Plaza (<40k)	54.45
	Storefront retail	882	Cannabis Dispensary ^d	227.76	Com mercial	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	Com mercial	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 use 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:

Commuter 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 storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.	None required	Less than significant

Utilities and Service System Impacts	Mitigation Measures	Impact Classification
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.	None 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.	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, Los 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

Groundwater Supply Source	Estimated Capacity/Storage (AF)	Estimated Annual Draw (AF)
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%
	<i>Difference</i>	<i>2,472,000</i>	<i>2,505,000</i>	<i>2,528,000</i>	<i>2,510,000</i>	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%
	<i>Difference</i>	<i>43,450</i>	<i>34,720</i>	<i>31,660</i>	<i>26,160</i>	-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%
	<i>Difference</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	0.00%
Los Angeles County	Supply	83,086	81,724	80,324	79,024	-4.89%

Water Supply Agency ¹	Supply and Demand	2025 Projected (AF)	2030 Projected (AF)	2035 Projected (AF)	2040 Projected (AF)	Percent Increase (2025-2040)
Waterworks District No. 40: Antelope Valley	Demand	55,164	58,002	61,102	64,402	16.75%
	<i>Difference</i>	<i>27,922</i>	<i>23,722</i>	<i>19,222</i>	<i>14,622</i>	<i>-47.63%</i>
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%
	<i>Difference</i>	<i>16,505</i>	<i>14,005</i>	<i>12,365</i>	<i>10,595</i>	<i>-35.81%</i>
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%
	<i>Difference</i>	<i>8,910</i>	<i>-9,250</i>	<i>-18,723</i>	<i>-27,333</i>	<i>-406.77%</i>
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%
	<i>Difference</i>	<i>2,568,787</i>	<i>2,568,197</i>	<i>2,572,524</i>	<i>2,534,044</i>	<i>-1.35%</i>

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
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 Dominguez Florence-Firestone Rosewood Willowbrook
Lennox	Lennox
Malibu	Santa Monica Mountains
Mesa Heights	Del Rey Ladera Heights View Park/Windsor Hills

Garbage Disposal District	Service Area
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

ECF Service Area	Waste Hauler	Service Area	
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
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
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 4, Division 19, Chapter 7 – Cultivators

§ 16311. Supplemental Water Source Information

The following information shall be provided for each water source identified by the applicant:

(a) Retail water supply sources:

(1) If the water source is a retail water supplier, as defined in section 13575 of the Water Code, such as a municipal provider, provide the following:

(A) Name of the retail water supplier; and

(B) A copy of the most recent water service bill or written documentation from the water supplier stating that service will be provided at the premises address.

(2) If the water source is a small retail water supplier, such as a delivery service, and is subject to section 26060.1(a)(1)(B) of the Business and Professions Code and the retail water supplier contract is for delivery or pickup of water from a surface water body or an underground stream flowing in a known and definite channel, provide all of the following:

(A) The name of the retail water supplier under the contract;

(B) The water source and geographic location coordinates, in either latitude and longitude or the California Coordinate System, of any point of diversion used by the retail water supplier to divert water delivered to the commercial cannabis business under the contract;

(C) The authorized place of use of any water right used by the retail water supplier to divert water delivered to the commercial cannabis business under the contract;

(D) The maximum amount of water delivered to the commercial cannabis business for cannabis cultivation in any year; and

(E) A copy of the most recent water service bill.

(3) If the water source is a small retail water supplier, such as a delivery service, and is subject to section 26060.1(a)(1)(B) of the Business and Professions Code and the retail water supplier contract is for delivery or pickup of water from a groundwater well, provide all of the following:

(A) The name of the retail water supplier under the contract;

(B) The geographic location coordinates for any groundwater well used to supply water delivered to the commercial cannabis business, in either latitude and longitude or the California Coordinate System;

(C) The maximum amount of water delivered to the commercial cannabis business for cannabis cultivation in any year;

(D) A copy of the well completion report filed with the Department of Water Resources pursuant to section 13751 of the Water Code for each percolating groundwater well used to divert water delivered to the commercial cannabis business. If no well completion report is available, the applicant shall provide evidence from the Department of Water Resources indicating that the Department of Water Resources does not have a record of the well completion report. When no well completion report is available, the State Water Resources Control Board may request additional information about the well; and

(E) A copy of the most recent water service bill.

(b) If the water source is a groundwater well, provide the following:

(1) The groundwater well's geographic location coordinates, in either latitude and longitude or the California Coordinate System; and

(2) A copy of the well completion report filed with the Department of Water Resources pursuant to section 13751 of the Water Code. If no well completion report is available, the applicant shall provide evidence from the Department of Water Resources indicating that the Department of Water Resources does not have a record of the well completion report. If no well completion report is available, the State Water Resources Control Board may request additional information about the well.

(c) If the water source is a rainwater catchment system, provide the following:

(1) The total square footage of the catchment footprint area(s).

(2) The total storage capacity, in gallons, of the catchment system(s).

(3) A detailed description and photographs of the rainwater catchment system infrastructure, including the location, size, and type of all surface areas that collect rainwater. Examples of rainwater collection surface areas include a rooftop and greenhouse.

(4) Geographic location coordinates of the rainwater catchment infrastructure in either latitude and longitude or the California Coordinate System.

(d) If the water source is a diversion from a waterbody (such as a river, stream, creek, pond, lake, etc.), provide any applicable water right statement, application, permit, license, or small irrigation use registration identification number(s), and a copy of any applicable statement, registration certificate, permit, license, or proof of a pending application issued under part 2 (commencing with section 1200) of division 2 of the California Water Code as evidence of approval of a water diversion by the State Water Resources Control Board.

CCR, Title 4, Division 19, Chapter 9 – Other Responsibilities

§ 17223. Waste Management

(a) A licensee shall dispose of all waste in accordance with the Public Resources Code and any other applicable state and local laws. It is the responsibility of the licensee to properly evaluate waste to determine if it should be designated and handled as a hazardous waste, as defined in Public Resources Code section 40141.

(b) A licensee shall establish and implement a written cannabis waste management plan that describes the method or methods by which the licensee will dispose of cannabis waste.

as applicable to the licensee's activities. A licensee shall dispose of cannabis waste using only the following methods:

(1) On-premises composting of cannabis waste.

(2) Collection and processing of cannabis waste by a local agency, a waste hauler franchised or contracted by a local agency, or a private waste hauler permitted by a local agency in conjunction with a regular organic waste collection route.

(3) Self-haul cannabis waste to one or more of the following:

(A) A staffed, fully permitted solid waste landfill or transformation facility;

(B) A staffed, fully permitted composting facility or staffed composting operation;

(C) A staffed, fully permitted in-vessel digestion facility or staffed in-vessel digestion operation;

(D) A staffed, fully permitted transfer/processing facility or staffed transfer/processing operation;

(E) A staffed, fully permitted chip and grind operation or facility; or

(F) A recycling center as defined in title 14, California Code of Regulations, section 17402.5(d) that meets the following:

(i) The cannabis waste received shall contain at least ninety (90) percent inorganic material;

(ii) The inorganic portion of the cannabis waste is recycled into new, reused, or reconstituted products that meet the quality standards necessary to be used in the marketplace; and

(iii) The organic portion of the cannabis waste shall be sent to a facility or operation identified in subsections (b)(3)(A)-(E).

(4) Reintroduction of cannabis waste back into agricultural operation through on-premises organic waste recycling methods including, but not limited to, tilling directly into agricultural land and no-till farming.

(c) The licensee shall maintain any cannabis waste in a secured waste receptacle or secured area on the licensed premises until the time of disposal. Physical access to the receptacle or area shall be restricted to the licensee, employees of the licensee, the local agency, waste hauler franchised or contracted by the local agency, or private waste hauler permitted by the local agency only. Nothing in this subsection prohibits licensees from using a shared waste receptacle or area with other licensees, provided that the shared waste receptacle or area is secured and access is limited as required by this subsection.

(d) A licensee that disposes of waste through an entity described in subsection (b)(2) shall do all of the following:

- (1) Maintain and make available to the Department upon request the business name, address, contact person, and contact phone number of the entity hauling the waste; and
 - (2) Obtain documentation from the entity hauling the waste that evidences subscription to a waste collection service.
- (e) If a licensee is self-hauling cannabis waste as allowed by the local jurisdiction, the licensee shall be subject to all of the following requirements:
- (1) Self-hauled cannabis waste shall only be transported by the licensee or its employees;
 - (2) Self-hauled cannabis waste shall only be transported to a facility specified in subsection (b)(3); and
 - (3) The licensee or its employee who transports the waste shall obtain for each delivery of cannabis waste a copy of a certified weight ticket or receipt from the solid waste facility.
- (f) A batch of cannabis or cannabis products that is being disposed of because the batch has failed internal quality testing, quality assurance review by a distributor, or regulatory compliance testing shall comply with the following additional requirements:
- (1) All cannabis or cannabis products in the batch shall be rendered unusable prior to disposal;
 - (2) Rendering of the cannabis or cannabis products shall be done under video surveillance, unless the rendering is performed by a licensee engaging in cultivation activities on a licensed premises authorized exclusively for cultivation activities or the cultivation area of a licensed microbusiness premises; and
 - (3) The reason for disposal and the disposition of the batch shall be noted in the track and trace system.

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 rescission 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 20x2020 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

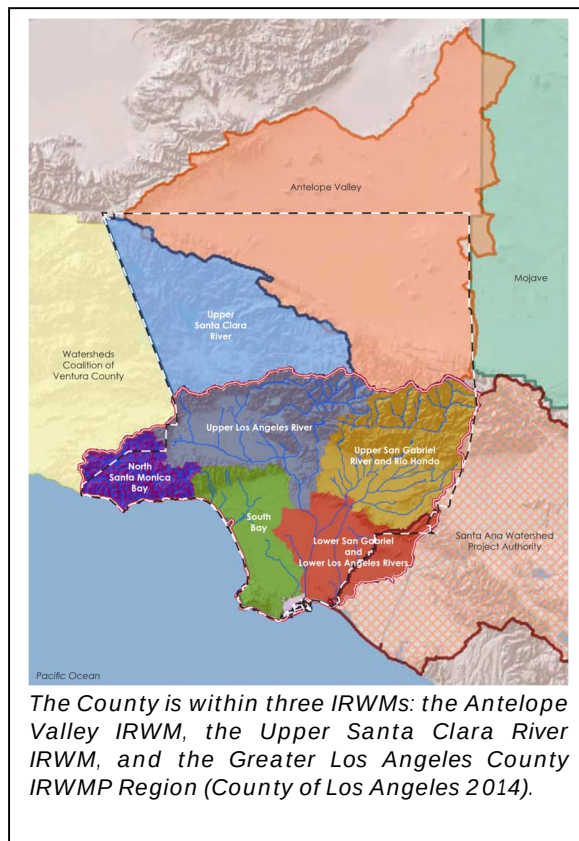
The Regional Water Management Planning Act of 2002 was established to implement Integrated Regional Water Management (IRWM), or the collaborative effort to manage all aspects of water resources in a region by integrating all facets of water supply, water quality, wastewater treatment, flood management, 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.



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

Supervisory Districts, and in the Antelope Valley in the Fifth Supervisory 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 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 3 rd 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 [PM₁₀ 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 be 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 [CO₂] 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., CO₂ 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 CO₂ equivalent (CO₂e) annually, compared to 51.59 MT CO₂e for retail and 16.73 MT CO₂e 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.

Assembly Bill (AB) 52 Tribal Consultation

To initiate AB 52 consultation for the proposed Project, the County's Office of Cannabis Management (OCM) requested a contact list from the California Native American Heritage Commission (NAHC), which identified 45 tribal contacts for potential consultation.

OCM sent certified notification letters to each contact provided by the NAHC that included a summary of the proposed Project, location information, OCM contact information, and an invitation to request formal consultation. OCM also followed up by email and phone with contacts that did not initially respond to ensure adequate notice and provide additional opportunities for engagement.

Twelve tribal representatives responded by acknowledging receipt or requesting additional information, and one tribe requested formal consultation. In September 2025, OCM met with representatives of the State-recognized Native American tribe, whose ancestral lands include areas within Los Angeles County.

During the consultation, OCM provided an overview of the proposed commercial cannabis licensing program and the Program EIR process, including zoning eligibility, the environmental resource areas under evaluation, and findings from the Initial Study indicating that the program is unlikely to cause significant ground disturbance or adversely affect tribal cultural resources. OCM also shared the interactive zoning map and invited feedback. Tribal representatives did not identify additional concerns related to the proposed licensing program.

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8.0 INTRODUCTION TO THE FINAL EIR

8.1 PUBLIC REVIEW PROCESS

Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15105 a 45-day public review period was provided for the Draft Program Environmental Impact Report (EIR) for the proposed Commercial Cannabis Business Licensing Program (Project), which began on February 12, 2026 and ended on March 30, 2026. During this time, the County of Los Angeles (County) Department of Consumer and Business Affairs (DCBA), Office of Cannabis Management (OCM) hosted a virtual public meeting on March 11, 2026 to present the proposed Project and Draft Program EIR findings to the public and solicit comments.

8.2 CEQA REQUIREMENTS

Before approving a project that may cause a significant environmental impact, CEQA requires the Lead Agency to prepare a Final Environmental Impact Report (EIR). CEQA Guidelines Section 15132 specifies that the Final EIR shall consist of:

- (a) The Draft EIR or a revision of the Draft EIR;
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

8.3 USE OF THE FINAL EIR

The Final Program EIR provides the public and the County decision-makers with an opportunity to review the response to comments, revisions to the Draft Program EIR, and other components of the Program EIR prior to the County's decision on the proposed Project and its alternatives. The Final Program EIR will serve as the environmental document to support approval of the proposed Project or its alternatives, either in whole or in part.

After completing a Final EIR, and before approving a project, the Lead Agency must first “certify” the Final EIR. As required by CEQA Guidelines Section 15090, certification consists of three distinct but complementary findings:

- That the Final EIR has been completed in compliance with CEQA;
- That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the project; and
- That the Final EIR reflects the Lead Agency's independent judgment and analysis.

The Final Program EIR and the findings will be submitted to County decision-makers for consideration in connection with the proposed Project.

CEQA “Findings of Fact” are adopted pursuant to CEQA Guidelines Section 15091(a), which provides that if an EIR that has been certified for a project identifies one or more significant environmental effects, the Lead Agency decision-making body must make one or more of the following findings with respect to each significant effect identified in the Final EIR:

- Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Each finding must be accompanied by a brief explanation of the rationale for the finding, though references to supporting text in the EIR documentation is commonly used to satisfy that requirement. In addition, pursuant to CEQA Guidelines Section 15091(d), the Lead Agency must adopt, in conjunction with the findings, a program for reporting on or monitoring the changes that it has either required in the project or made a condition of approval to avoid or substantially lessen environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. This program is referred to as the Mitigation Monitoring and Reporting Program (MMRP).

Additionally, pursuant to CEQA Guidelines Sections 15091(b) and 15093(b), when a Lead Agency approves a project that would result in significant, unavoidable impacts that are disclosed in the Final EIR, the Lead Agency must state in writing its reasons for supporting the approved action. This written statement, known as a “Statement of Overriding Considerations,” must be supported by substantial information in the record, which includes the Final EIR.

8.4 CORRECTIONS AND ADDITIONS

As required by CEQA Guidelines Section 15088, this section provides a summary of corrections or clarifications to the Draft Program EIR made based on the comments received on the Draft Program EIR, and the responses presented to said comments in Chapter 9, *Response to Comments*. None of the corrections and additions constitute significant new information or substantial changes to the Project Description as defined by CEQA Guidelines Section 15088.5.

Meaningful corrections and additions to the Draft Program EIR are summarized below. Meaningful changes are presented throughout the Final Program EIR document in ~~strikeout~~ and underline format; however, minor grammatical or typographical errors that

have been made following the publication of the Draft Program EIR are not listed below in this section.

New information added to an EIR is not significant unless the EIR is changed in a way that deprives the public of meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project's proponent has declined to implement. The minor clarifying revisions described below would not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact, or a feasible project alternative or mitigation measure that would clearly reduce the significant environmental impacts. These clarifications ensure internal consistency within the Program EIR and would not substantially change any of its conclusions. Therefore, pursuant to CEQA Guidelines Section 15088.5, the County is not required to recirculate the Draft Program EIR.

Chapter 1, Introduction

Table 1-2 on Page 1-9 has been revised to remove reference to the Draft Program EIR as shown below.

Final Program EIR	The County ~~will prepare a~~ <u>has prepared</u> the 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. <u>In total, 12 written comment letters and 19 oral comments were received from agencies, non-governmental organizations, community groups, and the public on the Draft Program EIR.</u> 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).

On Page 1-11 the description of the Program EIR contents and document organization as follows:

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, Introduction to the Final EIR (CEQA Guidelines § 15088), provides an overview of the Draft Program EIR review process, requirements for preparation of the Final Program EIR, a description of how the Final Program EIR will be used in the decision-making process, and a summary of the corrections and additions made to the Draft Program EIR.

Chapter 9, Response to Comments (CEQA Guidelines § 15088), Provides a copy of written responses to all written and oral comments received from agencies, non-governmental organizations, community groups, and the public on the Draft Program EIR.

Chapter & 10, 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.

Chapter 2, *Project Description*

Page 2-11 has been revised to include additional minor clarifying information regarding the State's cannabis licensing process and submittal requirements.

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. Future cannabis applicants are also responsible for preparing and submitting required project-specific documentation, such as waste management plans and operational materials to the appropriate reviewing agencies, including the State DCC, as part of the State licensing process.

Page 2-16 has been revised to include clarifying language that storefront retailers licensed under the proposed Project may also deliver cannabis goods, consistent with State Department of Cannabis Control (DCC) licensing and operating provisions.

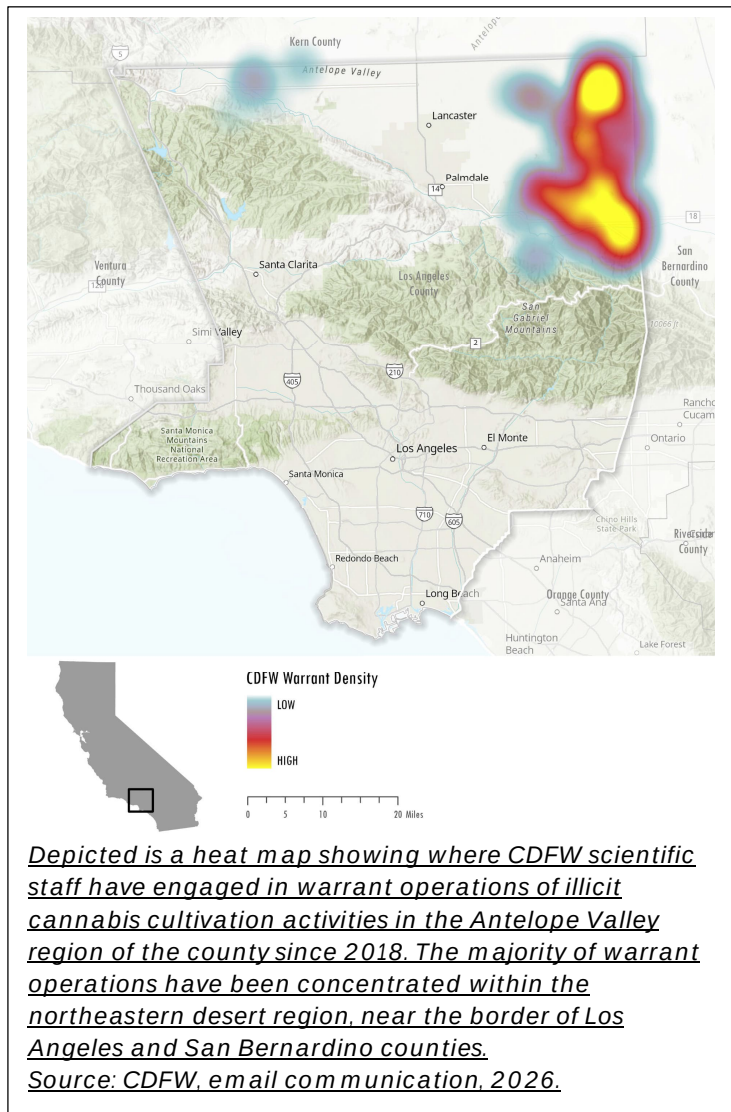
There are two primary types of cannabis retail businesses based on the activities performed and sales model, as follows:

- 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. Storefront retailers can also deliver cannabis and cannabis products consistent with State DCC regulations (State DCC 2026).
- 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.

Chapter 3, *Environmental Impact Analysis*

Page 3-3 has been revised to include additional information regarding California Department of Fish and Wildlife (CDFW) warrant operations of illicit cannabis operations in the county that was provided by CDFW following the Draft Program EIR review period.

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. Further, since 2018, California Department of Fish and Wildlife (CDFW) scientific staff have assisted in over 300 warrant operations of cannabis cultivation sites in the Antelope Valley region of the county, covering 2,000 acres, and have documented more than 350 environmental violations of the California Fish and Game Code (CDFW, email



communication, 2026). 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.

Section 3.1, Air Quality

Pages 3.1-16 through 3.1-18 have been revised to include additional information in the Regulatory Setting discussion of existing provisions of the California Code of Regulations (CCR) applicable to cannabis licensing and operating requirements.

California Code of Regulations

Title 8, §1529 - 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.

Title 17, Division 1, Chapter 8 – Lead-Based Paint

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/cm²) 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.”

Title 4, §15020 – Cultivation License Limited Operations Status

(e) The Department shall verify that all requirements to place the cultivation license in Limited Operations Status have been met. If all requirements have been met, the Department shall notify the cultivation licensee in writing that the requirements for the requested Limited Operations Status have been met.

Title 4, §16304: General Environmental Protection Measures

(a) All licensed cultivators shall comply with all of the following environmental protection measures:

(4) Requirements for generators pursuant to section 16306:**Title 4, §16305 – Renewable Energy Requirements**

(a) Beginning January 1, 2023, all holders of indoor, tier 2 mixed-light license types of any size, and all holders of nursery licenses using indoor or tier 2 mixed-light techniques shall ensure that electrical power used for commercial cannabis activity 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 (commencing with section 399.11) of the Public Utilities Code.

(b) If a licensed cultivator's average weighted greenhouse gas emission intensity, as calculated and reported upon license renewal pursuant to section 15020, 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. The carbon offsets shall be purchased from one or more of the following recognized voluntary carbon registries:

(1) American Carbon Registry;

(2) Climate Action Reserve; or

(3) Verified Carbon Standard.

Title 4, §16306 – Generator Requirements

(a) For the purposes of this section, “generator” is defined as a stationary or portable compression ignition engine pursuant to title 17, division 3, chapter 1, subchapter 7.5, section 93115.4 of the California Code of Regulations.

(b) Licensees using generators rated at 50 horsepower and greater shall demonstrate compliance with either, as applicable, the Airborne Toxic Control Measure for stationary engines pursuant to title 17, division 3, chapter 1, subchapter 7.5, sections 93115 through 93115.15 of the California Code of Regulations, or the Airborne Toxic Control Measure for portable engines pursuant to title 17, division 3, chapter 1, subchapter 7.5, sections 93116 through 93116.5 of the California Code of Regulations. Compliance shall be demonstrated by providing a copy of one of the following to the department upon request:

(1) For portable engines, a Portable Equipment Registration Certificate provided by the California Air Resources Board; or

(2) For portable or stationary engines, a Permit to Operate, or other proof of engine registration, obtained from the Local Air District with jurisdiction over the licensed premises

(c) Licensees using generators rated below 50 horsepower shall comply with the following by 2023:

(1) Either (A) or (B):

(A) Meet the “emergency definition for portable engines in title 17, division 3, chapter 1, subchapter 7.5, sections 93116.2(a)(12) of the California Code of Regulations, or the “emergency use” definition for stationary engines in title 17, division 3, chapter 1, subchapter 7.5, section 93115.4(a)(30); or

(B) Operate 80 hours or less in a calendar year; and

(2) Either (A) or (B):

(A) Meet Tier 3 with Level 3 diesel particulate filter requirements pursuant to title 13, division 3, chapter 14, sections 2700 through 2711 of the California Code of Regulations;

(B) Meet Tier 4, or current engines requirements if more stringent, pursuant to title 40, chapter 1, subchapter U, part 1039, subpart B, section 1039.101 of the Code of Federal Regulations.

(d) All generators shall be equipped with non-resettable hour-meters. If a generator does not come equipped with a non-resettable hour-meter an after-market non-resettable hour-meter shall be installed.

Section 3.2, *Energy*

Pages 3.2-9 through 3.2-11 have been revised to include additional information in the Regulatory Setting discussion of existing provisions of the CCR applicable to cannabis licensing and operating requirements.

California Code of Regulations

The following requirements are included in the State Department of Cannabis Control (DCC) regulations, California Code of Regulations (CCR), Title 4, Division 19, Chapter 1 and pertain to cultivation sites.

§ 15006. Premises Diagram

(h) If the commercial cannabis business is seeking a license to conduct cultivation activities on the proposed premises, the following must be clearly identified on the premises diagram:

(6) For indoor and Mixed-light license type applications, a lighting diagram with the following information must be included:

(A) Location of all lights in the canopy area(s); and

(B) Maximum wattage, or wattage equivalent, of each light.

§ 15011. Additional Information

(a) A commercial cannabis business applying for a license to cultivate cannabis shall provide the following information:

(5) For indoor and mixed-light license types, identification of all power sources for cultivation activities, including, but not limited to, illumination, heating, cooling, and ventilation.

§ 15020. Renewal of License

(e) Beginning January 1, 2022, an application for renewal of a license to engage in commercial cannabis cultivation shall include the following records, for each power source indicated on the application for licensure for the previous annual licensed period:

(1) Total electricity supplied by local utility provider, name of local utility provider, and greenhouse gas emission intensity per kilowatt hour reported by the utility provider under section 398.4(c) of the Public Utilities Code for the most recent calendar year available at time of submission;

(2) Total electricity supplied by a zero net energy renewable source, as set forth in section 398.4(h)(5) of the Public Utilities Code, that is not part of a net metering or other utility benefit;

(3) Total electricity supplied from other unspecified sources, as defined in section 398.2(e) of the Public Utilities Code, and other onsite sources of generation not reported to the local utility provider (e.g., generators, fuel cells) and the greenhouse gas emission intensity from these sources; and

(4) Average weighted greenhouse gas emission intensity considering all electricity use in subsections (e)(1)-(e)(3).

§ 16305. Renewable Energy Requirements

(a) Beginning January 1, 2023, all holders of indoor, tier 2 mixed-light license types of any size, and all holders of nursery licenses using indoor or tier 2 mixed-light techniques shall ensure that electrical power used for commercial cannabis activity 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 (commencing with section 399.11) of the Public Utilities Code.

(b) If a licensed cultivator's average weighted greenhouse gas emission intensity, as calculated and reported upon license renewal pursuant to section 15020, 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. The carbon offsets shall be purchased from one or more of the following recognized voluntary carbon registries:

(1) American Carbon Registry;

(2) Climate Action Reserve; or

(3) Verified Carbon Standard.

§ 16306. Generator Requirements

(a) For the purposes of this section, “generator” means a stationary or portable compression ignition engine, also known as a diesel engine, as defined in title 17, California Code of Regulations, section 93115.4.

(b) Licensed cultivators using generators rated at fifty (50) horsepower and greater shall demonstrate compliance with the Airborne Toxic Control Measure for stationary or portable engines, as applicable, established in title 17, California Code of Regulations, sections 93115-93116.5. Compliance shall be demonstrated by providing a copy of one of the following to the Department upon request:

(1) For portable engines, a Portable Equipment Registration Certificate provided by the California Air Resources Board; or

(2) For portable or stationary engines, a Permit to Operate or other proof of engine registration, obtained from the Local Air District with jurisdiction over the licensed premises.

(c) Licensed cultivators using generators rated below fifty (50) horsepower shall comply with the following by 2023:

(1) Either subsection (1)(A) or (1)(B):

(A) Meet the “emergency” definition for portable engines in title 17, California Code of Regulations, section 93116.2(a)(12), or the “emergency use” definition for stationary engines in title 17, California Code of Regulations, section 93115.4(a)(30); or

(B) Operate eighty (80) hours or less in a calendar year; and

(2) Either subsection (2)(A) or (2)(B):

(A) Meet Tier 3 with Level 3 diesel particulate filter requirements in title 13, California Code of Regulations, sections 2700-2711; or

(B) Meet Tier 4 requirements, or current engine requirements if more stringent, in title 40, Code of Federal Regulations, chapter I, subchapter U, part 1039, subpart B, section 1039.101.

(d) All generators used by licensed cultivators shall be equipped with non-resettable hour-meters. If a generator does not come equipped with a non-resettable hour-meter, an aftermarket non-resettable hour-meter shall be installed.

Section 3.4, Hazards and Hazardous Materials

Pages 3.4-14 through 3.4-16 have been revised to include additional information in the Regulatory Setting discussion of existing provisions of the CCR applicable to cannabis licensing and operating requirements.

California Code of Regulations

The following requirements are included in the State DCC regulations CCR, Title 4, Division 19, Chapter and pertain to cultivation sites.

§ 15006. Premises Diagram

(h) If the commercial cannabis business is seeking a license to conduct cultivation activities on the proposed premises, the following must be clearly identified on the premises diagram:

(5) For applicants for a Specialty Cottage, Specialty, Small, Medium, and Large license:

(C) Designated pesticide and other agricultural chemical storage area(s);

§ 15011. Additional Information

(a) A commercial cannabis business applying for a license to cultivate cannabis shall provide the following information:

(4) Evidence that the commercial cannabis business has conducted a hazardous materials record search of the EnviroStor database for the proposed premises. If hazardous sites were encountered, the applicant shall provide documentation of protocols implemented to protect employee health and safety.

(12) For all cultivator license types except processor, a signed attestation that states the commercial cannabis business shall contact the appropriate County Agricultural Commissioner regarding requirements for legal use of pesticides on cannabis prior to using any of the active ingredients or products included in the pest management plan and shall comply with all pesticide laws.

§ 16304. General Environmental Protection Measures

(a) All licensed cultivators shall comply with all of the following environmental protection measures:

(5) Requirements for pesticides pursuant to section 16307;

§ 16307. Pesticide Use Requirements

(a) Licensed cultivators shall comply with all applicable pesticide statutes and regulations enforced by the Department of Pesticide Regulation.

(b) For all pesticides that are exempt from registration requirements, licensed cultivators shall comply with all applicable pesticide statutes and regulations enforced by the Department of Pesticide Regulation and the following pesticide application and storage protocols:

(1) Comply with all pesticide label directions;

(2) Store chemicals in a secure building or shed to prevent access by wildlife;

(3) Contain any chemical leaks and immediately clean up any spills;

(4) Apply the minimum amount of product necessary to control the target pest;

(5) Prevent offsite drift;

(6) Do not apply pesticides when pollinators are present;

(7) Do not allow drift to flowering plants attractive to pollinators;

(8) Do not spray directly to surface water or allow pesticide product to drift to surface water. Spray only when wind is blowing away from surface water bodies;

(9) Do not apply pesticides when they may reach surface water or groundwater; and

(10) Only use properly labeled pesticides. If no label is available, consult the Department of Pesticide Regulation.

§ 16310. Pest Management Plan

(a) The licensed cultivator shall develop a pest management plan that includes:

(1) The product name and active ingredient(s) of all pesticides to be applied to cannabis; and

(2) Any integrated pest management protocols, including chemical, biological, and cultural methods, that will be used to prevent and control pests on the cultivation site.

Section 3.6, Transportation

Pages 3.6-20 has been revised to include clarifying language that storefront retailers licensed under the proposed Project may also deliver cannabis goods, consistent with State licensing and operating provisions.

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 (storefront and 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:

Section 3.7, *Utilities/Service Systems*

Pages 3.7-15 through 3.7-19 have been revised to include additional information in the Regulatory Setting discussion of existing provisions of the CCR applicable to cannabis licensing and operating requirements.

CCR, Title 4, Division 19, Chapter 7 – Cultivators

§ 16311. Supplemental Water Source Information

The following information shall be provided for each water source identified by the applicant:

(a) Retail water supply sources:

(1) If the water source is a retail water supplier, as defined in section 13575 of the Water Code, such as a municipal provider, provide the following:

(A) Name of the retail water supplier; and

(B) A copy of the most recent water service bill or written documentation from the water supplier stating that service will be provided at the premises address.

(2) If the water source is a small retail water supplier, such as a delivery service, and is subject to section 26060.1(a)(1)(B) of the Business and Professions Code and the retail water supplier contract is for delivery

or pickup of water from a surface water body or an underground stream flowing in a known and definite channel, provide all of the following:

(A) The name of the retail water supplier under the contract;

(B) The water source and geographic location coordinates, in either latitude and longitude or the California Coordinate System, of any point of diversion used by the retail water supplier to divert water delivered to the commercial cannabis business under the contract;

(C) The authorized place of use of any water right used by the retail water supplier to divert water delivered to the commercial cannabis business under the contract;

(D) The maximum amount of water delivered to the commercial cannabis business for cannabis cultivation in any year; and

(E) A copy of the most recent water service bill.

(3) If the water source is a small retail water supplier, such as a delivery service, and is subject to section 26060.1(a)(1)(B) of the Business and Professions Code and the retail water supplier contract is for delivery or pickup of water from a groundwater well, provide all of the following:

(A) The name of the retail water supplier under the contract;

(B) The geographic location coordinates for any groundwater well used to supply water delivered to the commercial cannabis business, in either latitude and longitude or the California Coordinate System;

(C) The maximum amount of water delivered to the commercial cannabis business for cannabis cultivation in any year;

(D) A copy of the well completion report filed with the Department of Water Resources pursuant to section 13751 of the Water Code for each percolating groundwater well used to divert water delivered to the commercial cannabis business. If no well completion report is available, the applicant shall provide evidence from the Department of Water Resources indicating that the Department of Water Resources does not have a record of the well completion report. When no well completion report is available, the State Water Resources

Control Board may request additional information about the well; and

(E) A copy of the most recent water service bill.

(b) If the water source is a groundwater well, provide the following:

(1) The groundwater well's geographic location coordinates, in either latitude and longitude or the California Coordinate System; and

(2) A copy of the well completion report filed with the Department of Water Resources pursuant to section 13751 of the Water Code. If no well completion report is available, the applicant shall provide evidence from the Department of Water Resources indicating that the Department of Water Resources does not have a record of the well completion report. If no well completion report is available, the State Water Resources Control Board may request additional information about the well.

(c) If the water source is a rainwater catchment system, provide the following:

(1) The total square footage of the catchment footprint area(s).

(2) The total storage capacity, in gallons, of the catchment system(s).

(3) A detailed description and photographs of the rainwater catchment system infrastructure, including the location, size, and type of all surface areas that collect rainwater. Examples of rainwater collection surface areas include a rooftop and greenhouse.

(4) Geographic location coordinates of the rainwater catchment infrastructure in either latitude and longitude or the California Coordinate System.

(d) If the water source is a diversion from a waterbody (such as a river, stream, creek, pond, lake, etc.), provide any applicable water right statement, application, permit, license, or small irrigation use registration identification number(s), and a copy of any applicable statement, registration certificate, permit, license, or proof of a pending application issued under part 2 (commencing with section 1200) of division 2 of the California Water Code as evidence of approval of a water diversion by the State Water Resources Control Board.

CCR, Title 4, Division 19, Chapter 9 – Other Responsibilities

§ 17223. Waste Management

(a) A licensee shall dispose of all waste in accordance with the Public Resources Code and any other applicable state and local laws. It is the responsibility of the licensee

to properly evaluate waste to determine if it should be designated and handled as a hazardous waste, as defined in Public Resources Code section 40141.

(b) A licensee shall establish and implement a written cannabis waste management plan that describes the method or methods by which the licensee will dispose of cannabis waste, as applicable to the licensee's activities. A licensee shall dispose of cannabis waste using only the following methods:

(1) On-premises composting of cannabis waste.

(2) Collection and processing of cannabis waste by a local agency, a waste hauler franchised or contracted by a local agency, or a private waste hauler permitted by a local agency in conjunction with a regular organic waste collection route.

(3) Self-haul cannabis waste to one or more of the following:

(A) A staffed, fully permitted solid waste landfill or transformation facility;

(B) A staffed, fully permitted composting facility or staffed composting operation;

(C) A staffed, fully permitted in-vessel digestion facility or staffed in-vessel digestion operation;

(D) A staffed, fully permitted transfer/processing facility or staffed transfer/processing operation;

(E) A staffed, fully permitted chip and grind operation or facility; or

(F) A recycling center as defined in title 14, California Code of Regulations, section 17402.5(d) that meets the following:

(i) The cannabis waste received shall contain at least ninety (90) percent inorganic material;

(ii) The inorganic portion of the cannabis waste is recycled into new, reused, or reconstituted products that meet the quality standards necessary to be used in the marketplace; and

(iii) The organic portion of the cannabis waste shall be sent to a facility or operation identified in subsections (b)(3)(A)-(E).

(4) Reintroduction of cannabis waste back into agricultural operation through on-premises organic waste recycling methods including, but not limited to, tilling directly into agricultural land and no-till farming.

(c) The licensee shall maintain any cannabis waste in a secured waste receptacle or secured area on the licensed premises until the time of disposal. Physical access to the receptacle or area shall be restricted to the licensee, employees of the licensee,

the local agency, waste hauler franchised or contracted by the local agency, or private waste hauler permitted by the local agency only. Nothing in this subsection prohibits licensees from using a shared waste receptacle or area with other licensees, provided that the shared waste receptacle or area is secured and access is limited as required by this subsection.

(d) A licensee that disposes of waste through an entity described in subsection (b)(2) shall do all of the following:

(1) Maintain and make available to the Department upon request the business name, address, contact person, and contact phone number of the entity hauling the waste; and

(2) Obtain documentation from the entity hauling the waste that evidences subscription to a waste collection service.

(e) If a licensee is self-hauling cannabis waste as allowed by the local jurisdiction, the licensee shall be subject to all of the following requirements:

(1) Self-hauled cannabis waste shall only be transported by the licensee or its employees;

(2) Self-hauled cannabis waste shall only be transported to a facility specified in subsection (b)(3); and

(3) The licensee or its employee who transports the waste shall obtain for each delivery of cannabis waste a copy of a certified weight ticket or receipt from the solid waste facility.

(f) A batch of cannabis or cannabis products that is being disposed of because the batch has failed internal quality testing, quality assurance review by a distributor, or regulatory compliance testing shall comply with the following additional requirements:

(1) All cannabis or cannabis products in the batch shall be rendered unusable prior to disposal;

(2) Rendering of the cannabis or cannabis products shall be done under video surveillance, unless the rendering is performed by a licensee engaging in cultivation activities on a licensed premises authorized exclusively for cultivation activities or the cultivation area of a licensed microbusiness premises; and

(3) The reason for disposal and the disposition of the batch shall be noted in the track and trace system.

Chapter 5, Other CEQA Considerations

Page 5-6 has been revised to include information regarding consultation with recognized Native American tribes conducted for the proposed Project, in compliance with the requirements of Assembly Bill (AB) 52.

Assembly Bill (AB) 52 Tribal Consultation

To initiate AB 52 consultation for the proposed Project, the County's Office of Cannabis Management (OCM) requested a contact list from the California Native American Heritage Commission (NAHC), which identified 45 tribal contacts for potential consultation.

OCM sent certified notification letters to each contact provided by the NAHC that included a summary of the proposed Project, location information, OCM contact information, and an invitation to request formal consultation. OCM also followed up by email and phone with contacts that did not initially respond to ensure adequate notice and provide additional opportunities for engagement.

Twelve tribal representatives responded by acknowledging receipt or requesting additional information, and one tribe requested formal consultation. In September 2025, OCM met with representatives of the State-recognized Native American tribe, whose ancestral lands include areas within Los Angeles County.

During the consultation, OCM provided an overview of the proposed commercial cannabis licensing program and the Program EIR process, including zoning eligibility, the environmental resource areas under evaluation, and findings from the Initial Study indicating that the program is unlikely to cause significant ground disturbance or adversely affect tribal cultural resources. OCM also shared the interactive zoning map and invited feedback. Tribal representatives did not identify additional concerns related to the proposed licensing program.

9.0 RESPONSE TO COMMENTS

9.1 INTRODUCTION

The Final Program Environmental Impact Report (EIR) provides responses to all written comments received on the Draft Program EIR during the 45-day public review period, which began on February 12, 2026 and ended on March 30, 2026. During this time, the County of Los Angeles (County) Department of Consumer and Business Affairs (DCBA), Office of Cannabis Management (OCM) hosted a virtual public meeting on March 10, 2026 to present the proposed Project and Draft Program EIR findings to the public and solicit comments. Comments on the Draft Program EIR include issues raised by the public, agencies, and community groups that warrant clarification or correction of certain statements in the Draft Program EIR. None of the corrections and additions constitute significant new information or substantial changes to the Project Description as defined by California Environmental Quality Act (CEQA) Guidelines Section 15088.5.

9.2 DISTRIBUTION OF THE DRAFT PROGRAM EIR

The Draft Program EIR was distributed to federal, state, regional, and local agencies, key stakeholders, interested parties, and neighborhood groups as well as the State Clearinghouse. A digital copy of the Draft Program EIR was made available at: dcba.lacounty.gov/cannabis/publiccomment. A physical copy of the Draft Program EIR was made available for public review by appointment Monday through Thursday, 8:30 AM to 4:30 PM at the DCBA office located at 320 W. Temple St. Room G-10. Los Angeles, CA 90012. In addition, printed copies of the Notice of Availability (NOA) and electronic copies of the Draft Program EIR were made available for public review at the following libraries: Rowland Heights Library; Acton Agua Dulce Library; Lennox Library; Topanga Library; A. C. Bilbrew Library; East Los Angeles Library; South Whittier Library; and La Crescenta Library.

9.3 COMMENTS ON THE DRAFT PROGRAM EIR

9.3.1 Introduction and Organization

Each comment letter has been assigned an abbreviation to indicate whether the comment was received from an agency, non-governmental organization, or individual, or provided as a verbal comment (e.g., agency comments have been abbreviated as “A”, non-governmental organizations and community group comments have been abbreviated as “O”). The body of each comment letter has been separated into individual comments, which have been numbered. This results in a numbering system whereby the first comment in the first letter from an agency is depicted as Comment A.1-1, A.1-2, A.1-3, and so on. These numbered comments are included in their entirety, followed by the corresponding responses. Copies of the comment letters are included preceding the responses to each comment letter.

Table 9-1 presents a list of all persons or agencies who submitted written comments on the Draft Program EIR.

Table 9-1. List of Public Comments Received on the Draft Program EIR

Comment Set	Name of Commenter	Date Received	Response Location
Agencies			
A.1	Bryan Fernandez, Los Angeles Unified School District	March 4, 2026	9-13
A.2	Victoria Tang, California Department of Fish and Wildlife	March 30, 2026	9-60
A.3	Kevin Ponce, California Department of Cannabis Control	March 30, 2026	9-72
Non-Governmental Organizations and Community Groups			
O.1	Don Kimball, Five Point Holdings, LLC	March 20, 2026	9-81
O.2	Sam Arahadjyan, Easy Waste Management	March 26, 2026	9-85
O.3	Jeremiah Owen, Acton Town Council	March 30, 2026	9-103
O.4	Jacqueline Ayer, Save Our Rural Town	March 30, 2026	9-113
O.5	Angela Sherick-Bright, Unified Homeowners Association II	March 30, 2026	9-118
Individuals			
I.1	Raneisha Hubbert	March 9, 2026	9-122
I.2	Anonymous	March 11, 2026	9-124
I.3	Priya Gehm	March 12, 2026	9-126
I.4	Candice Hill	March 26, 2026	9-128
Verbal Comments			
V.1	Miriel Bereal	March 10, 2026	9-129
V.2	Avis Bulbulyan	March 10, 2026	9-129
V.3	Jacqueline Ayer	March 10, 2026	9-130
V.4	Avis Bulbulyan	March 10, 2026	9-130
V.5	Jacqueline Ayer	March 10, 2026	9-131
V.6	Miriel Bereal	March 10, 2026	9-132
V.7	Gregory Taylor	March 10, 2026	9-132
V.8	Dominic Melendez	March 10, 2026	9-132
V.9	Blue English	March 10, 2026	9-132
V.10	Jacqueline Ayer	March 10, 2026	9-132
V.11	Miriel Bereal	March 10, 2026	9-133
V.12	Blue English	March 10, 2026	9-133
V.13	Jacqueline Ayer	March 10, 2026	9-133
V.14	Jacqueline Ayer	March 10, 2026	9-134

Comment Set	Name of Commenter	Date Received	Response Location
V.15	Miriel Bereal	March 10, 2026	9-135
V.16	Jacqueline Ayer	March 10, 2026	9-136
V.17	Miriel Bereal	March 10, 2026	9-136
V.18	Sidney Mathalon	March 10, 2026	9-136
V.19	Jacqueline Ayer	March 10, 2026	9-137

9.4 MASTER RESPONSES

The County received a number of similar comments on the Draft Program EIR, expressing common issues among those submitting written and/or oral comments. To address these issues and supplement individual responses, Master Responses were prepared for recurrent topics. The Master Responses provide a means of addressing overarching issues in a more concise manner intended to avoid excessive repetition. In some cases, an individual comment may be answered in total or in part by one or more Master Responses, with the individual response noting the link to Master Response(s) and expanding more specifically, where needed. This approach is aimed at helping individual commenters easily track where and how their comments have been addressed to ensure transparency and ease of access to responses.

The Master Responses include the County's feedback on the following topics:

9.4.1 Master Response 1 – Use of a Program EIR

Multiple commenters expressed concern that the Program EIR does not address site-specific environmental impacts or provide details for individual commercial cannabis license applications. However, as described in Chapter 1, *Introduction* and Chapter 3, *Environmental Impact Analysis*, potential environmental impacts are addressed programmatically, consistent with CEQA Guidelines Section 15168, because the proposed Project would implement 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.

CEQA Guidelines Section 15168(c) states that Program EIRs can be used with later activities, stating, “later activities in the program [in this case, development of individual project sites] must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.” CEQA Guidelines Section 15168(c)(1) continues, “[i]f a later activity would have effects that were not examined in the program EIR, a new IS would need to be prepared leading to either an EIR or a Negative Declaration.” The proposed Project would not involve specific development plans or project proposals or their approval. As such, approval of the proposed Project and certification of the Final Program EIR by the County Board of Supervisors would not approve, authorize, license, or

permit the construction or operation of any individual cannabis businesses. Rather, this programmatic analysis evaluates the environmental consequences of a policy-level decision, namely, the adoption of a countywide regulatory program that would enable the County to license, permit, and regulate commercial cannabis businesses in the unincorporated areas of the County. The Program EIR also analyzes 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). The Program EIR's impact conclusions are supported by Chapter 2, *Project Description*, the environmental setting, applicable County and State regulatory frameworks, and resource-specific methodologies that are disclosed in each technical chapter. While the details for future licensed commercial cannabis activities are unknown, the 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.

9.4.2 Master Response 2 – New Development

Multiple commenters expressed concern that the proposed Project could indirectly encourage development or redevelopment of vacant or underdeveloped land for future cannabis cultivation or other cannabis business activities, leading to environmental impacts not addressed in the Draft Program EIR. As described in Chapter 2, *Project Description*, commercial cannabis businesses would be permitted only in existing, legally constructed and permitted structures, and the Project does not authorize new construction for cannabis uses, per Title 22 of the LACC. To be eligible for commercial cannabis activities under the proposed Project, a site must also demonstrate 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 and fire) currently serve the areas in which new cannabis businesses would be located. Any new construction or redevelopment of a site, including extension of utility infrastructure, would be subject to separate County permitting and environmental review processes independent of the cannabis licensing program. The Initial Study (IS) and Program EIR also state that 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, minor site alterations would be subject to mandatory compliance with existing State and local plans, policies, and regulations applicable to the proposed site and use, including, but not limited to, County and Department of Cannabis Control (DCC) regulations governing exterior lighting, fencing, security features, and signage.

All future applications for a commercial cannabis license under the proposed Project would be required to go through the County's ministerial Site Plan Review processes, requiring approval from the County Planning Department. As part of the license application review

process, the applicant would be required to verify that the proposed premises is an existing, legally constructed, permitted, and permanent structure. If the proposed premises would require new construction, including the construction of a new building or structure, the applicant may be deemed ineligible for a commercial cannabis license and be denied.

The proposed Project does not provide a separate entitlement pathway for developing vacant land for cannabis uses. Any proposal to develop vacant or underdeveloped land would be reviewed through the County's existing land use, building, and permitting processes, separate from the cannabis licensing process and before an applicant could apply for a cannabis license. Depending on the type, size, location, and characteristics of the proposed development, that process may include site plan or conceptual review, Building and Safety plan check, fire or water provider clearances, and any other applicable permits or approvals. If a proposed development requires discretionary approval and no CEQA exemption applies, the County would conduct the appropriate CEQA review, which may include preparation of an IS and any required project-level analysis.

Broader land use development throughout the County, consistent with base zoning and land use, has been evaluated in prior planning-level environmental documents, including the County's Programmatic EIR for the General Plan Update, as well as CEQA-compliant environmental documents prepared for the various Area Plans and Specific Plans where base zones that would be eligible for commercial cannabis activities exist. These documents evaluate the impacts of future development based on land use and zoning designations, include mitigation measures addressing environmental impacts from future development, which may include requirements for site-specific environmental assessments and surveys, construction monitoring, and minimization and avoidance measures. These existing requirements, as well as applicable policies and regulations of the governing land use plan and LACC would continue to apply to future development projects where triggered by the County's land use and environmental review processes.

Further, the proposed Project does not propose any rezoning or upzoning of any parcels within the County, which could otherwise facilitate a change in anticipated land use patterns or encourage new development. Therefore, the proposed Project would not induce new development which could result in new, unanticipated and undisclosed impacts on the environment.

9.4.3 Master Response 3 – Description of Ordinance Amendments

Multiple commenters expressed concern that the Draft Program EIR was released before the proposed Title 8 and Title 22 amendments were circulated and that the amendments do not appear in the Program EIR. The Draft Title 22 Ordinance language was published for public review on May 29, 2025. The Proposed Operating Requirements Framework, which provides an overview framework of the proposed Amendments to Title 8, was also published for public review on April 6, 2025. Though the Draft Title 8 Ordinance language has not yet been published, the Draft Program EIR provides sufficient description of the

proposed Project to allow for programmatic analysis of potential environmental impacts. The CEQA Guidelines requires that an EIR includes a stable, finite, and accurate project description sufficient to inform the analysis of reasonably foreseeable environmental effects. Publication of the proposed ordinance revisions prior to circulation of a Draft Program EIR is not necessary to meet these CEQA requirements. As described in detail in Chapter 2, *Project Description*, the proposed Project consists of adoption of a countywide regulatory and licensing framework, including amendments to Titles 8 and 22 of the LACC. Discussion of the proposed amendments to the LACC to allow cannabis businesses subject to specific regulations is provided in Section 2.3.2, *Project Overview*. Section 2.3.3, *Proposed Allowable Cannabis Business Types* details the types of cannabis businesses that would be allowed under the proposed program, including details regarding the size, scale, and number of businesses that would be allowed. Section 2.3.4, *Proposed Areas Eligible for Cannabis Business Licensing* details the eligible zone districts where specific cannabis activities could be allowed. The details presented in these three referenced sections of the Program EIR form the basis for the description of the proposed Project and for the programmatic impact analysis presented in this Program EIR.

As part of final decision-maker approval for the proposed Project, the County would codify the proposed regulations and revisions to existing sections of the LACC in an ordinance, along with the mitigation measures identified to reduce the potential physical environmental effects associated with the uses and intensities that have been analyzed. The CEQA Guidelines and relevant case law clearly allow the description of uses and the intensities as presented in the Draft Program EIR, rather than the complete draft ordinance language, as it is the uses, the areas on which those uses could occur, and the range of intensities described for the uses, that could manifest in the physical environmental impacts that are the subject of CEQA. In fact, the presentation of these details allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts consistent with CEQA Guidelines 15168(b).

Thus, the proposed Project, as described in the Draft Program EIR, provides a suitable amount of information to allow for thorough and meaningful environmental review of the potential impacts of the proposed Project under CEQA, without the need for publication of the complete draft ordinance language prior to public review and comment on the Draft Program EIR.

9.4.4 Master Response 4 – Public Safety, Code Enforcement, and Crime

Several commenters raised concerns regarding code enforcement, past complaint response, business compliance, and potential crime associated with commercial cannabis businesses.

As discussed in Chapter XV, Public Services, of the IS (Appendix A), impacts related to public services were determined to be less than significant. This conclusion is based on the limited

number of commercial cannabis businesses authorized under the proposed Project, geographic restrictions on where businesses could be permitted, and the availability of existing public safety service infrastructure. The County does not anticipate that implementation of the proposed Project would require construction of new public safety facilities or physical expansion of existing Sheriff's Department or Los Angeles County Fire Department facilities.

Licensed commercial cannabis businesses would be subject to extensive State and local safety and compliance requirements. State regulations require security measures related to premises access, security plans, video surveillance, security personnel, locks, and alarm systems. These requirements are intended to reduce unauthorized access, theft, diversion, and other security risks.

OCM would administer commercial cannabis licensing and enforce most operating requirements for licensed commercial cannabis businesses in the unincorporated areas. Licensed businesses would be subject to ongoing inspections by regulatory agencies, including inspections of business premises, vehicles, equipment, and records. Failure to cooperate with an inspection or audit, or failure to comply with applicable requirements, may result in enforcement action, including notices to correct, fines, suspension, or revocation of a license.

Alternatively, OCM's role in addressing unlicensed cannabis business activity is limited to receiving and reviewing complaints and coordinating with the appropriate agencies. Enforcement against illicit businesses is handled primarily by the Sheriff's Department, County Counsel, and the District Attorney's Office.

For the purposes of CEQA, the public services analysis evaluates whether the proposed Project to license and regulate commercial cannabis businesses would result in substantial adverse physical environmental impacts associated with the need for new or physically altered public facilities, such as new Fire or Sheriff facilities. Given the extensive operating requirements for these businesses and limitations on eligible sites, the proposed Project is not expected to create substantial new demands on local law enforcement, fire protection, or emergency services requiring new or physically altered public safety facilities.

9.5 RESPONSE TO COMMENTS

The following pages contain copies of the comment letters. Presented first is a copy of the comment letter with vertical lines indicating the extent of specific numbered comments, and on the subsequent pages are the corresponding numbered response to individual comments.

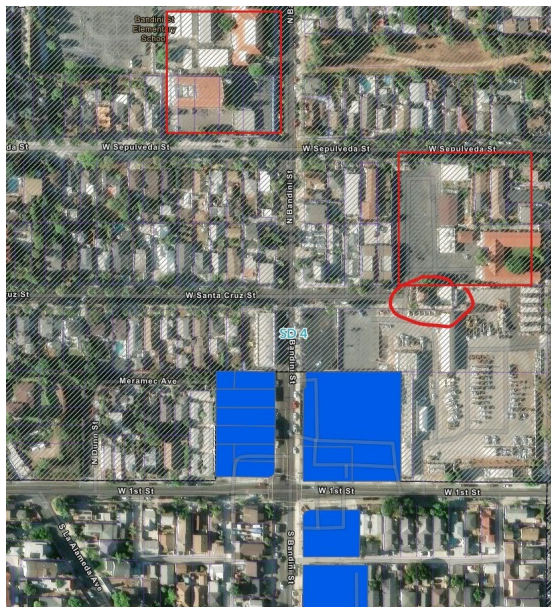
9.5.1 Agencies

From: [Fernandez, Bryan](#)
To: [Fernando Nieto](#)
Cc: [Meisinger, Nick](#); [DCBA CannabisEIR](#); [GODEK, GWENN \(Contract Professional\)](#)
Subject: Re: Commercial Cannabis Program Ordinance and EIR
Date: Wednesday, March 4, 2026 2:26:43 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image.png](#)

CAUTION: External Email. Proceed Responsibly.

Thank you Fernando for being on top of this. You have the right address for San Pedro CAS and to be specific, the "youth-oriented" use on the site per the ordinance's definition is the San Pedro Early Education Center [San Pedro Early Education Center](#).

If you're buffering from the site's parcels, you may miss school buildings that are on the right-of-way on Santa Cruz (circled). I also double checked and can confirm that Brandini Elementary School is within 600 feet of the same eligibility areas.



Sincerely,

Bryan Ramos Fernandez, AICP
[CEQA Project Manager](#)
Contract Professional
Los Angeles Unified School District (LAUSD)
Office of Environmental Health and Safety (OEHS)
333 S Beaudry Ave., 21st Floor, Los Angeles, CA 90017

A.1-1

O: (213) 241-4210
cp-bryan.fernandez@lausd.net

From: Fernando Nieto <FNieto@DCBA.lacounty.gov>
Sent: Wednesday, March 04, 2026 11:18 AM
To: Fernandez, Bryan <cp-bryan.fernandez@lausd.net>
Cc: Meisinger, Nick <nick.meisinger@wsp.com>; DCBA CannabisEIR
<CannabisEIR@dcba.lacounty.gov>; GODEK, GWENN (Contract Professional)
<gwenn.godek@lausd.net>
Subject: RE: Commercial Cannabis Program Ordinance and EIR

CAUTION: EXTERNAL EMAIL

Hi Bryan,

Appreciate your comment and for flagging this issue.

We are currently updating the buffered uses on the map. I have confirmed that White MS and Halldale ES are correctly shown in the updated version, which has not yet been published.

San Pedro CAS also appears to be showing the correct buffers. However, the image you sent did not load on my end, so I just want to confirm that San Pedro CAS is located at **950 W Santa Cruz St, San Pedro, CA 90731**.

I also want to clarify that while parcels within a buffered use may still appear as eligible on the map, any parcel where cannabis uses would otherwise be permitted that is intersected by a buffer would not be eligible. I'll check with our GIS team to see how we may be able to make this clearer on the map.

Thank you,

Fernando Nieto
Program Chief
Office of Cannabis Management
Department of Consumer and Business Affairs
320 W. Temple St. Room G-10,
Los Angeles, CA 90012
213.712.5459 | Fnieto@dcba.lacounty.gov

A.1-1
cont.



DCBA.LACounty.gov | [Facebook](#) | [Instagram](#) | [YouTube](#) | [Twitter](#) | [Twitter en Espa?ol](#)

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From: Fernandez, Bryan <cp-bryan.fernandez@lausd.net>

Sent: Wednesday, March 4, 2026 9:19 AM

To: Fernando Nieto <FNieto@DCBA.lacounty.gov>

Cc: Meisinger, Nick <nick.meisinger@wsp.com>; DCBA CannabisEIR <CannabisEIR@dcba.lacounty.gov>; GODEK, GWENN (Contract Professional) <gwenn.godek@lausd.net>

Subject: Commercial Cannabis Program Ordinance and EIR

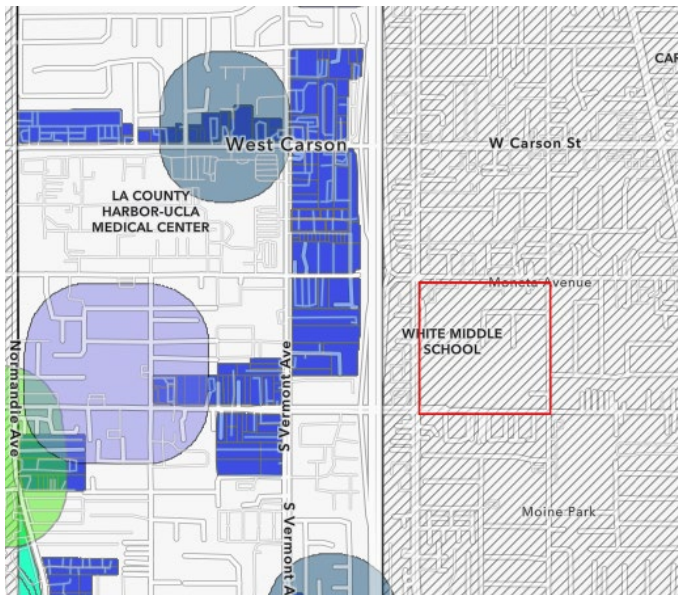
CAUTION: External Email. Proceed Responsibly.

Hi Fernando,

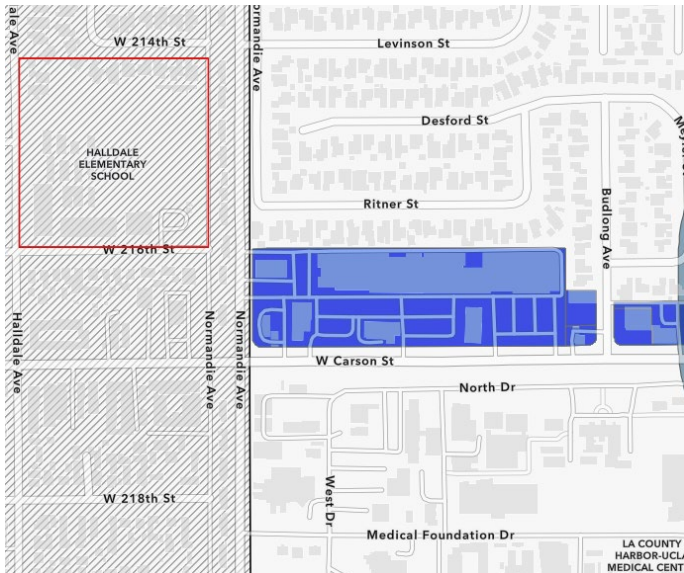
My name is Bryan Ramos Fernandez, CEQA Project Manager at LAUSD's Office of Environmental Health and Safety (OEHS). LA County is proposing an ordinance legalizing cannabis businesses and it will prohibit cannabis businesses within 600 feet of schools. The County created a [map](#) of Proposed Cannabis Business Permit Eligibility Areas. However, the map missed a handful of District schools leading to show areas within 600 feet of these schools as eligible for cannabis operations (schools are identified below). We're requesting that the map and the data underlying that map be updated. Please make sure that these schools are also appropriately analyzed in the [Draft](#) EIR and include LAUSD as an interested party.

White MS

A.1-1
cont.



Halldale ES



San Pedro CAS

Sincerely,

Bryan Ramos Fernandez, AICP

CEQA Project Manager

Contract Professional

Los Angeles Unified School District (LAUSD)

Office of Environmental Health and Safety (OEHS)

333 S Beaudry Ave., 21st Floor, Los Angeles, CA 90017

O: (213) 241-4210

cp-bryan.fernandez@lausd.net

A.1-1
cont.

Comment Letter A.1 – [Bryan Fernandez, Los Angeles Unified School District]***Comment Response A.1-1***

This comment provides site-specific information regarding the location of Los Angeles Unified School District (LAUSD) facilities relative to mapped cannabis eligibility areas, including the San Pedro Early Education Center, Brandini Elementary School, Halldale Elementary School, and White Middle School. The County appreciates LAUSD's assistance in identifying instances where school facilities or school-related structures located within public rights-of-way may not have been fully captured in the initial Geographic Information System (GIS) datasets used to prepare the initial eligibility figures referenced in the Program EIR.

The County acknowledges that the eligibility maps are programmatic screening tools prepared using available countywide GIS layers that were available at the time and are not intended to serve as final determinations for site eligibility. These maps may contain data gaps or omissions due to limitations in source data, including the depiction of school facilities located partially or wholly within rights-of-way. Further, the County acknowledges that development throughout the County would continue throughout the implementation of this ordinance. For example, new day care centers, public parks, or new school facilities may be constructed at various locations within the County.

Under the proposed Project, any potentially eligible parcel would be evaluated against the required buffer from existing land uses at the time of application (i.e., 600 feet from existing youth-oriented uses including public or private schools, child day care centers, public parks). Prior to issuance of any cannabis license, as part of the licensing application review process, the County would ensure that applications are consistent with the proposed site eligibility and buffer requirements. Any such, sites that are located within this buffer at the time of application would not be eligible for a commercial cannabis license.

The County updated its youth-oriented use data in April 2026 and will continue to periodically update the eligibility map to help ensure it remains a useful resource for community members. For instance, the County plans to conduct regular updates of the eligibility maps following decision-maker hearings and approval of the Project to address identified errors or omissions, incorporate updated GIS datasets, and depict licensed commercial cannabis sites that get approved under the Commercial Cannabis Business Licensing Program.



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

Via Electronic Mail Only

March 30, 2026

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: Draft Program Environmental Impact Report for the Los Angeles County Commercial Cannabis Business Licensing Program, SCH No. 2025030223, San Diego County, CA

Dear Fernando Nieto:

A.2-1

The California Department of Fish and Wildlife (CDFW) reviewed the draft Program Environmental Impact Report (DPEIR) from the County of Los Angeles, Department of Consumer and Business Affairs (County) for the Los Angeles County Commercial Cannabis Business Licensing Program (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹. 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 commends the County's efforts to regulate cannabis business activities. 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.

CDFW ROLE

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;

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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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, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources and are of regional and statewide significance (CCR 15086 and 15206).

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority pursuant to the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration program (Fish & G. Code, § 1600 et seq.). If the Project as proposed may result in "take" as defined by State law² of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

CDFW PERMITTING ROLE

A.2-1 cont.

The California Department of Cannabis Control (DCC) establishes regulations for cannabis businesses and issues licenses for commercial cannabis cultivation projects in the State. To obtain a cannabis cultivation license from DCC, an entity shall provide a final LSA Agreement (Agreement) issued by CDFW, or written verification from CDFW that an Agreement is not required (Business and Professions Code 26060.1 (b) (3)). The proposed ordinance amendments in Section G (Prohibited Uses) recognizes this nexus and states that "[a]ny cannabis business or use that is not expressly recognized by both a County Cannabis License and a State cannabis license, and permitted by this Title 22, is prohibited."

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 final Program Environmental Impact Report (FPEIR) to facilitate implementation of LSA and CESA review for the State's cannabis permitting program in the County. To minimize the need for additional

² "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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CEQA review when contemplating issuance of Agreements or CESA authorization for cannabis uses, CDFW recommends the FPEIR 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).

In addition, an entity must comply with guidelines for cannabis cultivation activities to protect water quality and instream flows including Fish & G. Code, §§ 1602, 5650, 5652, Water C. §§ 13260, 13264(a) & 13265. Compliance is typically provided through proof of enrollment in the State Water Resources Control Board (SWRCB) Cannabis Cultivation Policy and General Order that describes waste discharge requirements for cannabis cultivation, standards for setbacks to streams and forbearance provisions to protect flows (Fish & G. Code, § 5937).

PROJECT DESCRIPTION SUMMARY

A.2-1 cont.

Proponent: County of Los Angeles, Department of Consumer and Business Affairs

Objective: The Project is the adoption and implementation of a cannabis ordinance and regulatory licensing program for commercial cannabis activities/operations in the unincorporated areas of the County. The Project includes amendments to the Title 8 (Consumer Protection, Business and Wage Regulations) and Title 22 (Planning and Zoning) of the Los Angeles County Code (LACC) to allow for commercial cannabis cultivation (indoor only), manufacturing, distribution, retail sales, and testing on legal parcels in specific zones subject to County licensing. Amendments to LACC Title 22 will include changes to existing standards for personal cannabis cultivation, allowed or prohibited uses in each zone, required buffers from specified land uses, and a Site Plan approval requirement. The amendments would prohibit outdoor and mixed-light cultivation.

Indoor cultivation would be limited to a maximum of 22,000 square feet of canopy in eligible industrial zones (zones M-1, M-1.5, and M-2). Cultivation would be prohibited in all other zones, including agricultural zones. Cannabis distribution businesses would be allowed in eligible commercial (zone C-M) and industrial zones (zones M-1, M-1.5, and M-2). The Project would also allow cannabis microbusinesses in eligible commercial (zone C-M) and industrial zones (zones M-1, M-1.5, and M-2) that consist of at least three of the following: indoor cultivation (smaller than 10,000 square feet), non-volatile manufacturing, distribution, storefront retail sales, or non-storefront retail sales. 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. In addition to the buffers required in California Business and Professions Code § 26054, the Project would prohibit cannabis businesses within public lands or a Significant Ecological Area (LACC Chapter 22.102), within 600 feet of a youth-oriented use or drug abuse and

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recovery treatment center, and cannabis storefront retail businesses within 500 feet of another cannabis storefront retail business.

The Project would only allow commercial cannabis activities in existing (as of the time of application for a license), legally constructed, and permitted structures located in appropriate zoning. The Project would not permit the development of new buildings or the redevelopment of existing buildings to accommodate a proposed cannabis business. All commercial cannabis businesses would be required to conduct operations entirely within an enclosed building or structure. 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. Initially, the Project would make available ten commercial cannabis cultivation licenses, ten manufacturing licenses, ten distribution licenses, ten testing licenses, and 50 retail licenses (25 storefront retail licenses and 25 non-storefront retail licenses).

Location: Unincorporated areas of Los Angeles County.

A.2-1 cont.

Biological Setting: The County is a regional biodiversity hotspot that provides habitat to support breeding, migration, and a high density of species, many of which are considered sensitive under CEQA (CEQA Guidelines, § 15380). Major habitat types in the County include chaparral, coastal sage scrub, riparian woodland, grassland, desert shrubland, riverine, and wetlands. While the Project area consists primarily of developed urban areas, undeveloped lands eligible for cannabis businesses are located within portions of Antelope Valley and Santa Clarita. The majority of eligible areas in Antelope Valley also lack structures sufficient for cannabis businesses.

According to the [California Natural Diversity Database](https://wildlife.ca.gov/Data/CNDDDB)³ (CNDDDB), 14 sensitive natural communities occur within five miles of areas eligible for cannabis businesses, including Southern Sycamore Alder Riparian Woodland, Southern Riparian Scrub, Southern Willow Scrub, Mojave Riparian Forest, Southern Mixed Riparian Forest, Southern Cottonwood Willow Riparian Forest, Southern Coast Live Oak Riparian Forest, Southern Riparian Forest, Canyon Live Oak Ravine Forest, Riversidian Alluvial Fan Sage Scrub, Southern Coastal Bluff Scrub, Valley Oak Woodland, California Walnut Woodland, and Open Engelmann Oak Woodland (CDFW 2026a, CDFW 2026b). In addition to the sensitive natural communities, the Project area also supports many California Endangered Species Act (CESA) listed, federal Endangered Species Act (ESA) listed, and/or Fully Protected species (collectively, Listed Species; CDFW 2026c, USFWS 2026), sensitive species, and rare plants species. CNDDDB records indicate 60 Listed Species (see Table 1), 79 rare plants (California Rare Plant Ranking of 1A, 1B.1, 1B.2, 1B.3, 2A, and 2B.2; see Table 2), and 46 California Species of Special

³ <https://wildlife.ca.gov/Data/CNDDDB>

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Concern (SSC; see Table 3) were observed within five miles of the Project area. Notable species that occur in Antelope Valley where there is the most undeveloped land eligible for cannabis businesses include, but are not limited to, burrowing owl (*Athene cunicularia*; CESA-candidate), western Joshua tree (*Yucca brevifolia*; CESA-candidate), and Mohave ground squirrel (*Xerospermophilus mohavensis*; CESA-threatened).

Project History: On February 15, 2022, the Los Angeles County Board of Supervisors (Board) directed Department of Consumer and Business Affairs' Office of Cannabis Management to move forward with the development and implementation of the Project 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 Notice of Preparation (NOP) of a draft programmatic environmental impact report (DPEIR) for the Project was received on March 5, 2025, and CDFW submitted comments on April 4, 2025. CDFW received the notice of available (NOA) of a DPEIR on February 13, 2026, which requested comments to be submitted by March 30, 2026. CDFW also appreciates the opportunity to meet with the County Office of Cannabis Management on March 3, 2026, regarding our NOP comments (CCR 15083).

A.2-1 cont.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions are also included to improve the document.

1. Development or Redevelopment of Land

Issue: The development or redevelopment of land at the site level for cannabis cultivation may impact biological resources.

Specific impact: The ordinance amendments included in the Project may result in the individual development or redevelopment of land to support cannabis cultivation activities. Land development to support cultivation can impact sensitive habitats, stream resources, special status species, and wildlife connectivity.

Why impact would occur: The DPEIR does not discuss potential impacts to biological resources from site land development or the potential for the Project to induce land development resulting in potentially significant unmitigated impacts to biological resources. The DPEIR also does not identify a mechanism to evaluate potential impacts to biological resources at the individual or site level (CCR 15168(c)). Information for the Project on Eligible zones for cannabis businesses (see [Eligibility Zones for Commercial](#)

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[Cannabis in Unincorporated Los Angeles County](#)⁴) contain undeveloped lands (see Figure 1). A large portion of the eligible areas within Antelope Valley are undeveloped or lack structures suitable for cannabis businesses. While the DPEIR states on that commercial cannabis businesses “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” (DPEIR page 2-8), the Project does not preclude the development of a vacant property for the purpose of a cannabis business. Instead, it just requires the building be constructed at the time of application for a business license and does not identify a mechanism at the land use approval to evaluate potential impacts to biological resources from development of vacant land at the site level. While the development of a property for a cannabis business would require separate licenses, approvals, and/or policy consistency analyses before applying for a cannabis business license, the Project can provide an incentive for the development of land that may not otherwise occur without the Project. Examples where vacant land with resources were developed for the sole purpose of cannabis businesses include the Coachillin' Industrial Cultivation and Ancillary Canna-Business Park in the City of Desert Hot Springs and the High Season Industrial Park in the City of Adelanto. Similar to these areas with low land costs and sensitive resource, Antelope Valley may also provide a financial incentive for cannabis businesses to construct a new building rather than to lease or purchase an existing building in high land cost areas and redevelop the building to be suitable for cannabis business operations.

A.2-1 cont.

Land development or redevelopment can result in direct impacts to sensitive habitat and sensitive species from grading, clearing, type conversion, and grubbing of existing vegetation, which can have numerous impacts on the local ecosystem, stream resources, and to sensitive flora and fauna. For example, vegetation removal for pad development, site access, utility installation, and drainage improvements associated with cannabis uses may result in the loss of sensitive habitat that supports special status plant and animal species or the direct the direct take of these species. Land development can also result in habitat fragmentation and loss of wildlife connectivity.

Evidence impact may be significant: Through the development and redevelopment of land at the site level, the Project has the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §§ 15065, 15380). As a result, the Project may have a substantial adverse effect, either directly or through habitat modifications, on species identified as a

⁴<https://lacounty.maps.arcgis.com/apps/instant/sidebar/index.html?appid=df60d1a4b1014df7866949fe465197>

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candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or the United States Fish and Wildlife Service.

CEQA Guidelines section 15121 and section 15123 require the document to analyze if the Project may have a significant effect on the environment as well as review if the Project will “identify possible ways to minimize the significant effects.” To analyze if a project may have a significant effect on the environment, the Project related impacts need to be disclosed during the public comment period. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity). The DPEIR does not analyze impacts to the development or redevelopment of lands for the purpose of cannabis businesses and the DPEIR does not provide any alternatives discussion or any avoidance strategies to mitigate the loss of habitat, impacts to sensitive species, or wildlife connectivity.

Recommended Potentially Feasible Mitigation Measure(s)

A.2-1 cont.

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document and ordinance text:

Mitigation Measure #1: Biological Surveys. A survey for biological resources shall be conducted at the site level by a qualified biologist (i.e., familiar with wildlife, plants, streams and habitats in the County) approved by the County prior to any staging or development activities. The survey area shall include the proposed development area, including areas of anticipated construction and ground disturbance, as well as staging areas, areas of anticipated light or noise impact, ingress and egress routes, and utility routes. The survey area shall be large enough to encompass areas subject to both direct and indirect impacts. The qualified biologist shall map land cover, identify natural communities and species observed, and assess the habitat suitability of the proposed activity footprint for special-status plants and wildlife, and sensitive habitats including streambed resources. A report with evidence to support a conclusion as to whether special status species and sensitive habitats are present or are likely to occur within the proposed activity footprint shall be submitted to the County for review. If special status species and sensitive habitats will be impacted by the Project, additional mitigation measures, permitting, and/or mitigation may be required.

Recommendation #1: Subsequent Environmental Review. CDFW is unclear of the process for how individual projects would be determined to be consistent with the LACC and General Plan. The LACC and General Plan do not appear to have mechanisms for site level analysis of impacts to biological resources from development of vacant land for structures that could then apply for a cannabis business license. The PEIR should clearly identify the process and have a mechanism for CDFW review, particularly for undeveloped land that may be developed for cannabis businesses (CCR 15168(c)). CDFW understands that the review of individual projects for impacts to biological

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resources would be led by the County Department of Regional Planning for consistency of the LACC and General Plan. In CDFW's experience development of a structure can often be ministerial. CDFW believes the development of land should not be ministerial in cases where vacant land is developed with structures and site improvements that may impact biological resources. In addition, the FPEIR should cite the specific requirements in the General Plan and LACC that address site level review for biological resources, or include them as part of the Project, prior to obtaining a final cannabis business license.

Recommendation #2: Land Development and Redevelopment Discussion. The PEIR should include a discussion of the Project's potential to induce land development for the purpose of cannabis businesses and a discussion of impacts associated with the development and redevelopment of lands. Alternatively, the PEIR could be revised to state the building used for cannabis businesses must be existing as of the time the NOP was published, not at the time of application for a license, and that any new structures would require separate environmental review. This would ensure undeveloped land is not developed for the purpose of cannabis cultivation without proper environmental review.

Recommendation #3: Environmental Baseline. Because the Project would allow for existing structures and may also result in development of properties for cannabis cultivation that may not occur without Project, the Environmental Baseline should include an analysis of properties within areas eligible for cannabis businesses that have existing, legally constructed, and permitted structures sufficient for cannabis businesses and properties that are undeveloped and will require development. CEQA Guidelines section 15125, subdivision (a)(1) requires a description of the physical environmental conditions in the vicinity of the project as they exist at the time the notice of preparation is published, absent substantial evidence that an existing conditions analysis would be misleading or without informational value. In addition, *Environmental Planning and Information Council v. County of El Dorado* (1982) 131 Cal. App. 3d 350, 354 determined that CEQA is focused on the "effects of projects on the actual environment upon which the proposed project will operate". This disclosure of an accurate baseline analysis is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

A.2-1 cont.

2. Western Burrowing Owl

Issue: The development or redevelopment of lands at the site level may impact western burrowing owl and its habitat.

Specific impact: The development or redevelopment of a site for a cannabis business often requires ground-disturbing activities, such as vegetation removal and grading, which can result in habitat loss and can lead to death or injury of western burrowing owls. Development and redevelopment activities can also disrupt foraging behavior for western burrowing owl present on site.

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Why impact would occur: As discussed above in Comment 1, the Project does not preclude the development of a property for the purpose of a cannabis business. According to the CNDDb, western burrowing owl have been historically observed near the Project area, including in undeveloped areas such as Antelope Valley. Urban development in Antelope Valley contributes to the ongoing loss of suitable habitat for burrowing owls and rapid decline of the burrowing owl population size on a regional scale. Due to various factors, including habitat loss and population decline, burrowing owls were recently petitioned to be listed as an endangered or threatened species under CESA by the Center of Biological Diversity (CBD 2024). According to the Antelope Valley Regional Conservation Investment Strategy (AVRCIS), suitable habitat for burrowing owl encompasses a variety of landscapes throughout the region, but it is imperative that burrows, typically from small mammals (e.g., California ground squirrel), already exist to allow burrowing owl to occupy them (DCMA 2021). Development and redevelopment induced by the Project can result in direct impacts western burrowing owl through take and indirect impacts through the removal of suitable habitat.

A.2-1 cont.

Evidence impact may be significant: Burrowing owl is a species designated as a candidate for listing as threatened or endangered pursuant to CESA (Fish & G. Code, § 2050 et seq.). Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Additionally, take of individual western burrowing owl and their nests is defined by Fish and Game Code section 86 and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative 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 CDFW.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #2: Burrowing Owl Surveys. A burrowing owl survey at the site level shall be conducted prior to any staging or development activities to avoid impacts to burrowing owls and/or occupied burrows. The survey shall be conducted by a qualified biologist and in accordance with the methods outlined in CDFW's [Staff Report on Burrowing Owl Mitigation](#)⁵ (CDFW 2012) or CDFW's most recent guidance. Documentation of surveys and findings shall be submitted to the County for review. If no burrowing owls or

⁵ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>

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occupied burrows are detected, project activities may begin, and no additional avoidance and minimization measures shall be required. If an active nest (i.e., occupied with eggs or fledglings) is found outside, but within 500 feet, of the development footprint, the qualified biologist shall establish a "no-disturbance" buffer around the burrow location(s). The size of the "no-disturbance" buffer shall be determined in consultation with CDFW and be based on the proposed level of disturbance. If an occupied burrow is found within the development footprint, the project proponent shall contact CDFW to develop appropriate mitigation and management procedures or obtain an Incidental Take Permit from CDFW. If burrowing owl presence is confirmed, the project proponent shall offset impacts by acquiring mitigation lands for the species. The potential mitigation land shall have the following: 1) have presence of burrowing owl; 2) sufficiently replace the impacted burrowing owl habitat area to ensure no net loss of habitat; and 3) be of equivalent or greater habitat value than that of the project site.

Mitigation Measure #3: Incidental Take Permit. If western burrowing owl is detected the Project and impacts cannot be avoided, the proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the County prior to implementing Project ground-disturbing activities and vegetation removal.

A.2-1 cont.

Recommendation #4: Analysis of Western Burrowing Owl Impacts. The FPEIR should include a discussion of the Project's impact to western burrowing owl from the development or redevelopment of land and include mitigation measures sufficient to reduce the impact less than significant. CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to western Joshua trees and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

3. Western Joshua Tree

Issue: The development or redevelopment of a site may result in take of western Joshua tree, a CESA candidate species.

Specific impact: Many of the eligible areas for cannabis businesses in Antelope Valley are undeveloped and may support western Joshua tree. The development of a site for a cannabis business requires ground-disturbing activities that can result in direct and

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indirect take of western Joshua tree. The DPEIR does not propose avoidance and minimization measures to reduce Project impacts to western Joshua tree to less than significant.

Why impact would occur: As discussed above in Comment 1, the Project does not preclude the development of a property for the purpose of a cannabis business. Western Joshua tree occurs in areas of Antelope Valley that are eligible for cannabis businesses (CDFW 2022). Primary threats to the western Joshua tree are climate change, development and other human activities, and wildfire (CDFW 2022). Much of the recent western Joshua tree habitat modification and destruction has been the result of ongoing urban development, typically on private property within the general vicinity of existing developed areas (CDFW 2022). In addition, development often results in habitat fragmentation, which could disrupt plant and pollinator population dynamics by altering pollinator densities and behavior (Xiao et al. 2016), and potentially leading to a reduction in reproductive output for western Joshua tree. As fragmentation increases, specialist species (i.e., organisms adapted to a specific habitat and/or specific diet) such as the yucca moth needed for western Joshua tree reproduction, may decrease in number from the fragmented area while generalists species (i.e., organism that occurs in a wide range of habitats and can use a wide variety of resources) become more prevalent (Xiao et al. 2016). Development of properties for purposes of a cannabis business or redeveloping a property to support cannabis business operations (e.g., access improvements and fencing) could result in the direct take of western Joshua tree through grading, habitat conversion, and construction and indirect take through habitat fragmentation and reduced dispersal.

A.2-1 cont.

Evidence impact may be significant: Western Joshua tree is a candidate for listing as threatened or endangered pursuant to CESA (Fish & G. Code, § 2050 et seq.). Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Additionally, take of individual western burrowing owl and their nests is defined by Fish and Game Code section 86 and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative 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 CDFW.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

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Mitigation Measure #4: Western Joshua Tree Survey. Prior to any staging or development activities at the site level, a western Joshua tree census shall be conducted by a qualified biologist within the Project site and an appropriate distance around the Project site. The census shall be conducted in accordance with CDFW's [Western Joshua Tree Census Instructions](#).⁶ Findings from the census shall be compiled in a report submitted to the County prior to the beginning of Project activities.

Mitigation Measure #5: Incidental Take Permit. If western Joshua tree is detected and will be impacted by development of the site, the Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the County prior to implementing Project ground-disturbing activities and vegetation removal.

A.2-1 cont.

Recommendation #5: Analysis of Western Joshua Tree Impacts. The FPEIR should include a discussion of the Project's impact to western Joshua tree from the development or redevelopment of land to support cannabis businesses and include mitigation measures sufficient to reduce the impact less than significant. CDFW's issuance of an ITP for a project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to western Joshua trees and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

4. Mohave Ground Squirrel

Issue: The development or redevelopment of a site for cannabis uses may impact Mohave ground squirrel, a CESA-listed threatened species.

Specific Impact: Development and redevelopment construction activities (e.g., equipment staging, mobilization, and grading) at the site level may result in mortality or injury to Mohave ground squirrel. Project ground-disturbing activities such as vegetation removal may result in habitat destruction within the Project site and may contribute to further habitat decline within the range for this species.

⁶ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=238156&inline>

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Why Impacts would occur: As discussed above in Comment 1, the Project does not preclude the development of a property for the purpose of a cannabis business. Mohave ground squirrel has been documented historically to occur within the Antelope Valley region (CNDDDB 2026a). Some eligible areas for cannabis businesses area in Antelope Valley are either undeveloped or surrounded undeveloped land, which may support local movement of small wildlife, such as Mohave ground squirrel. The DPEIR does not propose avoidance and minimization measures to reduce Project impacts to Mohave ground squirrel to less than significant. Development of land for cannabis businesses without avoidance measures could result in potential injury or mortality of Mohave ground squirrel and contribute to permanent loss of habitat.

A.2-1 cont.

Evidence impact would be significant: The Mohave ground squirrel has a restricted geographic range in the western Mojave Desert, where it has suffered from habitat loss as a result of conversion or degradation of native vegetation for residential, industrial, and energy-related developments, agriculture, recreation, and other human uses. On-going development plans, including residential, industrial, energy-related, agricultural, and recreational projects, present a serious threat to remaining Mohave ground squirrel populations (CDFW 2010). CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. Inadequate avoidance, minimization, and mitigation measures for impacts on the Mohave ground squirrel will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on a wildlife species identified as special status by CDFW and USFWS. As to CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9).

Recommended Potentially Feasible Mitigation Measure(s):

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #6: Mohave Ground Squirrel Surveys. Prior to any staging or development activities at the site level, a qualified biologist familiar with Mohave ground squirrel behavior and life history shall conduct focused surveys for Mohave ground squirrel throughout the Project site. Focused Mohave ground squirrel surveys shall follow CDFW's [Mohave Ground Squirrel Survey Guidelines](https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83975)⁷ (CDFW 2023).

If a survey conducted according to CDFW guidelines results in no capture or observation of Mohave ground squirrel on a Project site, this is not necessarily evidence that the

⁷ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83975>

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Mohave ground squirrel does not exist on the site or that the site is not actual or potential habitat of the species. However, in the circumstance of such a negative result, CDFW may stipulate that the Project site harbors no Mohave ground squirrel. This stipulation would expire one year from the end date of the last trapping on the Project site conducted according to these guidelines. However, if Mohave ground squirrel or other listed species are discovered on the Project site, avoiding take of a listed species and/or securing authorization for incidental take of a listed species pursuant to Fish and Game Code Section 2081(b) et seq. remains the responsibility of the Project applicant.

Mitigation Measure #7: Incidental Take Permit. The Project applicant may choose to forgo focused Mohave ground squirrel presence/absence surveys and assume presence of Mohave ground squirrel on site. Under this option, an ITP shall be obtained for Mohave ground squirrel prior to ground/vegetation disturbance activities. The Project shall mitigate for temporary and/or permanent impacts to Mohave ground squirrel habitat as specified in conditions of the ITP through habitat acquisition at a CDFW-approved location and mitigation ratio.

A.2-1 cont.

Recommendation #6: Analysis of Mohave Ground Squirrel Impacts. The FPEIR should include a discussion of the Project's impact to Mohave ground squirrel from the development or redevelopment of land to support cannabis businesses and include mitigation measures sufficient to reduce the impact less than significant. CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Mohave ground squirrel and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.

5. Other Special Status and Sensitive Species

Issue: The proposed Project may impact sensitive species protected under CESA and/or ESA, species designated as SSC, or rare plant species.

Specific Impact: Development and redevelopment activities (e.g., equipment staging, mobilization, and grading) may impact the many Listed, SSC, or rare plant species that may occur within the Project areas (see Tables 1 through 3 for lists of special status species identified within five miles of the Project area). Development can result in direct mortality, nest abandonment, decreased feeding frequency, and a loss of breeding and/or foraging habitat.

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Why Impacts would occur: The DPEIR does not discuss impacts to biological resources from the development or redevelopment of properties at the site level for the purpose of cannabis businesses or provide mitigation measures to reduce the impact to less than significant. Individual sites in the Project area may contain suitable habitat for many special status and sensitive species. Development and redevelopment activities could include vegetation removal, grading, and general construction. Project activities could create elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These disturbances and stressors occurring near potential nests could cause individuals to abandon their nests, resulting in the loss of fertile eggs or nestlings. After construction activities are completed, the Project could continue to impact these species through an increase in noise from heavier road use.

A.2-1 cont.

Evidence impact would be significant: CDFW considers adverse impacts to a species protected by CESA, absent appropriate mitigation, to be significant under CEQA. Under CESA, take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). In addition, nests of all native bird species are protected under State laws and regulations, including Fish and Game Code, sections 3503 and 3503.5.

SCC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines § 15065). CDFW considers adverse impacts to an SSC, for the purposes of CEQA, to be significant without mitigation.

Plants with a California Rare Plant Rank (CRPR) of 1B and 2B meet the definition of endangered, rare, or threatened species under CEQA (CEQA Guidelines, § 15380; CNPS 2022). Plants with a California Rare Plant Rank of 1B are rare throughout their range with the majority of them endemic to California. Most of the plants that are ranked 1B have declined significantly over the last century. California Rare Plant Rank 1B plants constitute the majority of taxa in the CNPS Inventory, with more than 1,000 plants assigned to this category of rarity. Impacts on rare plants could require a mandatory finding of significance. The Project's impact on special-status plants has yet to be mitigated below a significant level. Accordingly, the Project continues to have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species by CDFW or USFWS. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law under CESA (Fish and Game Code, §§ 86, 2062, 2067, 2068, 2080, 2085; California Code of Regulations, title 14, § 786.9).

All the plants constituting California Rare Plant Rank 1B meet the definitions of the California Endangered Species Act of the California Fish and Game Code and are eligible for state listing. Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, or those considered to be

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functionally equivalent to CEQA, as they meet the definition of Rare or Endangered under CEQA Guidelines section 15125; (c) and/or section 15380.

Recommended Potentially Feasible Mitigation Measure(s):

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

A.2-1 cont.

Mitigation Measure #8: Sensitive Species Surveys. Prior to any staging or development activities at the site level, a qualified biologist shall conduct biological surveys of any areas where potential special status biological resources (special status species and SSC), or sensitive natural communities may occur. During the design of the project, and prior to construction, the project proponent shall employ a qualified biologist to review the proposed project. To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters. If a desktop review indicates that special status biological resources or natural communities may occur in the project area, the project proponent shall either assume presence and mitigate accordingly, or a qualified biologist shall conduct species-specific biological surveys or botanical field surveys to confirm the presence and extent of special status biological resources and/or sensitive natural communities prior to the start of construction. Surveys shall be conducted according to protocols currently accepted by CDFW and/or USFWS. If no accepted survey protocol exists, the project proponent shall consult CDFW for guidance. To determine presence/absence or accurately identify rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year should be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire). If special status biological resources or their sign (e.g., scat, burrows) are observed, the project proponent shall report the observation to CDFW through an entry in the California Natural Diversity Database (CNDDB) and develop a plan to avoid impacts that is specific to each species. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take of CESA-protected species. If the desktop review indicates that no special status biological resources or natural communities may occur in the project area, then biological surveys are not required.

Recommendation #7: Analysis of Special Status Species Impacts. The FPEIR should include a discussion and disclosure of potential impacts to biological resources from the

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development or redevelopment of sites for the purpose of cannabis businesses. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

6. Security Fencing

A.2-1 cont.

Issue: Site alterations required for security fencing to obtain a license may impact biological resources.

Specific impact: Cannabis businesses often require specific types of fencing and lighting for security purposes as a requirement for licensing. If not located and designed properly, 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.

Why impact would occur: Cannabis businesses generally require the installation of security fencing to prevent theft and unauthorized access. The Initial Study on page 28 states “[a]ny 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.” The Initial Study indicates that new fencing may be a permitting requirement for cannabis businesses. The Initial Study and DPEIR do not describe the fencing that would be required, nor does the Initial Study or DPEIR cite the section of the LACC that specifies the type and design of fencing that would be required.

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.

Evidence impact may be significant: The Project may require security fencing for new cannabis businesses, which may create a new or increased barrier and interfere substantially with the movement of wildlife especially in rural areas like Antelope Valley and Santa Clarita where many properties currently have no fencing. The Project has the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §§ 15065, 15380). As a result, the Project may have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

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Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #9: Fencing Plan. A fencing plan should be provided for each cannabis operation at the site level to demonstrate that wildlife entrapment and mortality and connectivity are mitigated to less than significant. Should any subsequent proposed project occur in a location that has been identified as a wildlife movement corridor or found to impede the free movement of wildlife, the FPEIR should include mechanisms at the site level to provide 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.

Recommendation #8: Analysis of Fencing Impact. FPEIR should analyze impacts from required security measures and other fencing/barriers required for cannabis projects to animal species and wildlife movement/connectivity. The FPEIR should include information on the height, length, type of materials, maintenance requirements, and location of fencing that would be needed for cannabis businesses. The FPEIR should also provide a mechanism for analyzing and mitigating potential impacts from fencing at the individual (site) level.

7. Stream Crossings

A.2-1 cont.

Issue: Site alterations required to obtain a license may impact stream resources.

Specific impact: Individual cannabis businesses may require construction, replacement, paving, and maintenance for site access, including stream crossings, which can result in temporary and permanent impacts to stream resources and sensitive habitats.

Why impact would occur: Cannabis businesses often require site and access improvements to support business operations. Access improvements can include the construction, replacement, or maintenance of stream crossings or other activities like road rolling, compaction and paving in or near stream areas. Stream crossings are often located sensitive habitat that can support wildlife and wildlife movement. Crossings can be at-grade, culverts, and bridges to allow access to cannabis businesses. If not designed

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or maintained 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. Paving, grading and other maintenance activities for site access can also occur within or adjacent to streams.

Evidence impact may be significant: CDFW exercises its regulatory authority pursuant to Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- 1) Divert or obstruct the natural flow of any river, stream, or lake;
- 2) Change the bed, channel, or bank of any river, stream, or lake;
- 3) Use material from any river, stream, or lake; or,
- 4) Deposit or dispose of material into any river, stream, or lake.

A.2-1 cont.

The Project may adversely affect streams through the construction, replacement, paving, or maintenance of crossings or other or other activities required for access. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative 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 CDFW.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #10: LSA. Individual businesses shall notify the California Department of Fish and Wildlife (CDFW) pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW prior to Project activities that will impact streams. For projects requiring a LSA, the Notification shall include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity. The hydrology report shall also include a hydrological evaluation of any potential scour or erosion at the

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Project site due to a storm event for existing and proposed conditions. Please visit CDFW's [Lake and Streambed Alteration Program webpage](#)⁸ for more information (CDFW 2026d).

Mitigation Measure #11: Compensatory Mitigation. If impacts to streams are unavoidable, the cannabis business shall provide compensatory mitigation for impacts on streams and associated plant communities as part of the County land use and business license process. Any off-site mitigation shall occur where a stream supports the same plant communities impacted by the project and preferably within the same watershed. A.2-1 cont.

Recommendation #9: Analysis of Stream Crossing Impacts. The FPEIR should analyze impacts from construction, replacement, paving, and maintenance of stream crossings for cannabis business access to plant and animal species and wildlife movement/connectivity. The FPEIR should also provide a mechanism for analyzing and mitigating potential impacts from stream crossings at the individual (site) level.

ADDITIONAL COMMENTS

1. **Mitigation and Monitoring Reporting Plan.** CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public A.2-2 Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).
2. **Prior Business Occupancy Requirement.** The DPEIR states "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." (DPEIR page 2-8). The DPEIR further states that it is a requirement that cannabis businesses occupy existing buildings that are either currently or were previously occupied by other businesses (DPEIR page 3.2-22). As discussed above in Comment 1, the Project does not preclude the development of a property for the purpose of a cannabis business, rather it requires the building be constructed at the time of application for a license. A cannabis business would not replace an existing business in a building if a building was constructed for the purpose of a cannabis business. A.2-3

The DPEIR uses the requirement that a building be occupied or previously occupied as justification for determining the Project will have less than significant impacts. For

⁸ <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

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example, the DPEIR on page 3.7-33 states “[p]otential 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.” This statement may not be accurate as undeveloped areas are eligible for cannabis businesses (see Figure 1) and the DPEIR only requires the building be constructed at the time of application for licensing. In this example, some of the undeveloped land eligible for cannabis businesses may not have available utilities; therefore, these areas would require construction of infrastructure to accommodate the cannabis businesses and, as the DPEIR notes, may cause significant environmental impacts. These impacts are not analyzed in the PEIR.

A.2-3 cont.

The FPEIR should clarify the meaning of the requirement for cannabis businesses to occupy existing buildings that are either currently occupied or were previously occupied by other businesses. The FPEIR should also include a minimum duration a non-cannabis business must occupy the building prior to the building being eligible for cannabis businesses. Alternatively, as discussed above in Comment 1, the PEIR could be revised to state the building must be existing as of the time the NOP was published, and not the time of application for a license. If a building does not need to be previously occupied by another business, the FPEIR should remove this as justification that the Project will have less than significant impacts.

3. **Updated Eligibility Map.** The [Eligibility Zones for Commercial Cannabis in Unincorporated Los Angeles County](#)⁹ map included in the NOP and DPEIR should be updated to remove locations that are not eligible for cannabis businesses per the requirements in the PEIR. For example, the Project would prohibit cannabis businesses in Significant Ecological Areas, but the eligibility map includes areas within Significant Ecological Areas (see Figure 2). This would provide a full disclosure of areas eligible for cannabis businesses. A.2-4
4. **Unpermitted Cannabis Environmental Baseline.** 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). The DPEIR Environmental Baseline includes an estimated number of unpermitted cannabis storefront retail businesses operating within unincorporated County but does not include an estimate of unpermitted cannabis cultivation, which may be greater than unpermitted cannabis storefront retail businesses, nor does the DPEIR identify measures to address associated impacts to environmental resources A.2-5

⁹ <https://lacounty.maps.arcgis.com/apps/instant/sidebar/index.html?appid=df60d1a4b1014df7866949fe46519711>

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affected by unpermitted cultivation sites (CEQA Guidelines, § 15125, Pub. Resources Code §§ 21060, 21068).

A.2-5 cont.

As discussed in CDFW comments on the NOP, all unpermitted facilities should be evaluated. CDFW and partner law enforcement agencies have investigated over 160 unpermitted cannabis cultivation sites in the Antelope Valley area of the County. County Sheriffs also participate, both independently and with CDFW, in the investigation of unpermitted cultivation and should have additional data available for the FPEIR.

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 FPEIR 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 the County.

5. **LACC Title 8 and 22 Amendments and Operating Requirements Framework.** The DPEIR does not include the specific amendments to Title 8 and Title 22 of the LACC or the proposed requirements for cannabis businesses. The [proposed operating requirements framework](#)¹⁰ and the [amendments to Title 8 and 22 of the LACC in redline/strike](#)¹¹ are found on the [County's website](#);¹² however, these documents should also be incorporated into the FPEIR since they are part of the Project.

A.2-6

6. **Expansion of Licensing Program.** The DPEIR states "[i]nitially, 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." (DPEIR page 1-7). CDFW requests to be notified when the County proposes to increase the number of available licenses. The PEIR should

A.2-7

¹⁰ https://dcba.lacounty.gov/wp-content/uploads/2025/04/Commercial-Cannabis-Business-Operating-Requirements-Framework_revised-04.06.25.pdf

¹¹ https://dcba.lacounty.gov/wp-content/uploads/2025/09/Draft-Title-22-Cannabis-Ordinance_updated-052925.pdf

¹² <https://dcba.lacounty.gov/cannabis/>

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A.2-7
cont.

also identify the mechanism for environmental review of any increase in cultivation licenses.

- 7. Agency Collaboration.** 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. 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 also 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. 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.

ENVIRONMENTAL DATA

A.2-8

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the CNDDDB. The [CNDDDB website](#)¹³ provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)¹⁴.

The County should ensure data collected for the preparation of the draft PEIR is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for

¹³ <https://wildlife.ca.gov/Data/CNDDDB>

¹⁴ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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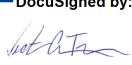
the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the draft PEIR to assist the County in identifying and mitigating Project impacts on biological resources. We look forward to partnering with the County. CDFW requests an opportunity to review and comment on any response that the County has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to [Keith Yaeger](#)¹⁵, Senior Environmental Scientist (Specialist)

Sincerely,

DocuSigned by:

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Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

Attachment B: Figures and Tables

cc: California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
Randy Rodriguez, Senior Environmental Scientist (Supervisor)
Keith Yaeger, Senior Environmental Scientist (Specialist)

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

REFERENCES

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¹⁵ Phone: 562-519-7144; Email: Keith.Yaeger@wildlife.ca.gov

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Attachment A: Draft Mitigation Monitoring and Reporting Program (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #1: Biological Surveys. A survey for biological resources shall be conducted at the site level by a qualified biologist (i.e., familiar with wildlife, plants, streams and habitats in the County) approved by the County prior to any staging or development activities. The survey area shall include the proposed development area, including areas of anticipated construction and ground disturbance, as well as staging areas, areas of anticipated light or noise impact, ingress and egress routes, and utility routes. The survey area shall be large enough to encompass areas subject to both direct and indirect impacts. The qualified biologist shall map land cover, identify natural communities and species observed, and assess the habitat suitability of the proposed activity footprint for special-status plants and wildlife, and sensitive habitats including streambed resources. A report with evidence to support a conclusion as to whether special status species and sensitive habitats are present or are likely to occur within the proposed activity footprint shall be submitted to the County for review. If special status species and sensitive habitats will be impacted by the Project, additional mitigation measures, permitting, and/or mitigation may be required.	Prior to Project construction and activities	Lead Agency/ Applicant
Recommendation #1: Subsequent Environmental Review. CDFW is unclear of the process for how individual projects would be determined to be consistent with the LACC and General Plan. The LACC and General Plan do not appear to have mechanisms for site level analysis of impacts to biological resources from development of vacant land for structures that could then apply for a	Prior to finalizing CEQA document	Lead Agency

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Mitigation Measure	Timing	Responsible Party
cannabis business license. The PEIR should clearly identify the process and have a mechanism for CDFW review, particularly for undeveloped land that may be developed for cannabis businesses (CCR 15168(c)). CDFW understands that the review of individual projects for impacts to biological resources would be led by the County Department of Regional Planning for consistency of the LACC and General Plan. In CDFW's experience development of a structure can often be ministerial. CDFW believes the development of land should not be ministerial in cases where vacant land is developed with structures and site improvements that may impact biological resources. In addition, the FPEIR should cite the specific requirements in the General Plan and LACC that address site level review for biological resources, or include them as part of the Project, prior to obtaining a final cannabis business license.		
Recommendation #2: Land Development and Redevelopment Discussion. The PEIR should include a discussion of the Project's potential to induce land development for the purpose of cannabis businesses and a discussion of impacts associated with the development and redevelopment of lands. Alternatively, the PEIR could be revised to state the building used for cannabis businesses must be existing as of the time the NOP was published, not at the time of application for a license, and that any new structures would require separate environmental review. This would ensure undeveloped land is not developed for the purpose of cannabis cultivation without proper environmental review.	Prior to finalizing CEQA document	Lead Agency
Recommendation #3: Environmental Baseline. Because the Project would allow for existing structures and may also result in development of properties for cannabis cultivation that may not occur without Project, the Environmental Baseline should include an analysis of properties within areas	Prior to finalizing CEQA document	Lead Agency

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Mitigation Measure	Timing	Responsible Party
eligible for cannabis businesses that have existing, legally constructed, and permitted structures sufficient for cannabis businesses and properties that are undeveloped and will require development. CEQA Guidelines section 15125, subdivision (a)(1) requires a description of the physical environmental conditions in the vicinity of the project as they exist at the time the notice of preparation is published, absent substantial evidence that an existing conditions analysis would be misleading or without informational value. In addition, Environmental Planning and Information Council v. County of El Dorado (1982) 131 Cal. App. 3rd 350, 354 determined that CEQA is focused on the “effects of projects on the actual environment upon which the proposed project will operate”. This disclosure of an accurate baseline analysis is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).		
Mitigation Measure #2: Burrowing Owl Surveys. A burrowing owl survey at the site level shall be conducted prior to any staging or development activities to avoid impacts to burrowing owls and/or occupied burrows. The survey shall be conducted by a qualified biologist and in accordance with the methods outlined in CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012) or CDFW's most recent guidance. Documentation of surveys and findings shall be submitted to the County for review. If no burrowing owls or occupied burrows are detected, project activities may begin, and no additional avoidance and minimization measures shall be required. If an active nest (i.e., occupied with eggs or fledglings) is found outside, but within 500 feet, of the development footprint, the qualified biologist shall establish a “no-disturbance” buffer around the burrow location(s). The size of the “no-disturbance” buffer shall be determined in consultation with CDFW and be	Prior to Project construction and activities	Lead Agency/ Applicant

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Mitigation Measure	Timing	Responsible Party
based on the proposed level of disturbance. If an occupied burrow is found within the development footprint, the project proponent shall contact CDFW to develop appropriate mitigation and management procedures or obtain an Incidental Take Permit from CDFW. If burrowing owl presence is confirmed, the project proponent shall offset impacts by acquiring mitigation lands for the species. The potential mitigation land shall have the following: 1) have presence of burrowing owl; 2) sufficiently replace the impacted burrowing owl habitat area to ensure no net loss of habitat; and 3) be of equivalent or greater habitat value than that of the project site.		
Mitigation Measure #3: Incidental Take Permit. If western burrowing owl is detected the Project and impacts cannot be avoided, the proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the County prior to implementing Project ground-disturbing activities and vegetation removal.	Prior to Project construction and activities	Lead Agency/ Applicant

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Mitigation Measure	Timing	Responsible Party
Recommendation #4: Analysis of Western Burrowing Owl Impacts. The FPEIR should include a discussion of the Project's impact to western burrowing owl from the development or redevelopment of land and include mitigation measures sufficient to reduce the impact less than significant. CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to western Joshua trees and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.	Prior to finalizing CEQA document	Lead Agency
Mitigation Measure #4: Western Joshua Tree Survey. Prior to any staging or development activities at the site level, a western Joshua tree census shall be conducted by a qualified biologist within the Project site and an appropriate distance around the Project site. The census shall be conducted in accordance with CDFW's Western Joshua Tree Census Instructions.¹⁶ Findings from the census shall be compiled in a report submitted to the County prior to the beginning of Project activities.	Prior to Project construction and activities	Lead Agency/ Applicant
Mitigation Measure #5: Incidental Take Permit. If western Joshua tree is detected and will be impacted by development of the site, the Project proponent shall coordinate with CDFW and obtain appropriate take	Prior to Project construction and activities	Lead Agency/ Applicant

¹⁶ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=238156&inline>

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Mitigation Measure	Timing	Responsible Party
authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the County prior to implementing Project ground-disturbing activities and vegetation removal.		
Recommendation #5: Analysis of Western Joshua Tree Impacts. The FPEIR should include a discussion of the Project's impact to western Joshua tree from the development or redevelopment of land to support cannabis businesses and include mitigation measures sufficient to reduce the impact less than significant. CDFW's issuance of an ITP for a project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to western Joshua trees and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.	Prior to finalizing CEQA document	Lead Agency
Mitigation Measure #6: Mohave Ground Squirrel Surveys. Prior to any staging or development activities at the site level, a qualified biologist familiar with Mohave ground squirrel behavior and life history shall conduct focused surveys for Mohave ground squirrel throughout the Project site. Focused Mohave ground squirrel surveys shall follow CDFW's Mohave Ground Squirrel	Prior to Project construction and activities	Lead Agency/ Applicant

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Mitigation Measure	Timing	Responsible Party
<u>Survey Guidelines</u>¹⁷ (CDFW 2023). If a survey conducted according to CDFW guidelines results in no capture or observation of Mohave ground squirrel on a Project site, this is not necessarily evidence that the Mohave ground squirrel does not exist on the site or that the site is not actual or potential habitat of the species. However, in the circumstance of such a negative result, CDFW may stipulate that the Project site harbors no Mohave ground squirrel. This stipulation would expire one year from the end date of the last trapping on the Project site conducted according to these guidelines. However, if Mohave ground squirrel or other listed species are discovered on the Project site, avoiding take of a listed species and or securing authorization for incidental take of a listed species pursuant to Fish and Game Code Section 2081 (b) et seq. remains the responsibility of the Project applicant.		
Mitigation Measure #7: Incidental Take Permit. The Project applicant may choose to forgo focused Mohave ground squirrel presence/absence surveys and assume presence of Mohave ground squirrel on site. Under this option, an ITP shall be obtained for Mohave ground squirrel prior to ground/vegetation disturbance activities. The Project shall mitigate for temporary and/or permanent impacts to Mohave ground squirrel habitat as specified in conditions of the ITP through habitat acquisition at a CDFW-approved location and mitigation ratio.	Prior to Project construction and activities	Lead Agency/ Applicant
Recommendation #6: Analysis of Mohave Ground Squirrel Impacts. The FPEIR should include a discussion of the Project's impact to Mohave ground squirrel from the development or redevelopment of land to support cannabis	Prior to finalizing CEQA	Lead Agency

¹⁷ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83975>

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Mitigation Measure	Timing	Responsible Party
businesses and include mitigation measures sufficient to reduce the impact less than significant. CDFW's issuance of an ITP for a Project is subject to CEQA. As a Responsible Agency, CDFW may consider the CEQA document from the lead agency/Project proponent for the Project. However, additional documentation may be required as part of an ITP application for the Project in order for CDFW to adequately develop an accurate take analysis and identify measures that would fully mitigate for take of CESA-listed species. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 2081 and/or under CEQA, a project's CEQA document should fully identify the potential impacts to Mohave ground squirrel and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the ITP.	document	
Mitigation Measure #8: Sensitive Species Surveys. Prior to any staging or development activities at the site level, a qualified biologist shall conduct biological surveys of any areas where potential special status biological resources (special status species and SSC), or sensitive natural communities may occur. During the design of the project, and prior to construction, the project proponent shall employ a qualified biologist to review the proposed project. To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters. If a desktop review indicates that special status biological resources or natural communities may occur in the project area, the project proponent shall either assume presence and mitigate accordingly, or a qualified biologist shall conduct species-specific biological surveys or botanical field surveys to confirm the presence and extent of special status biological resources and/or sensitive natural communities prior	Prior to Project construction and activities	Lead Agency/ Applicant

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Mitigation Measure	Timing	Responsible Party
to the start of construction. Surveys shall be conducted according to protocols currently accepted by CDFW and/or USFWS. If no accepted survey protocol exists, the project proponent shall consult CDFW for guidance. To determine presence/absence or accurately identify rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year should be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire). If special status biological resources or their sign (e.g., scat, burrows) are observed, the project proponent shall report the observation to CDFW through an entry in the California Natural Diversity Database (CNDDDB) and develop a plan to avoid impacts that is specific to each species. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take of CESA-protected species. If the desktop review indicates that no special status biological resources or natural communities may occur in the project area, then biological surveys are not required.		
Recommendation #7: Analysis of Special Status Species Impacts. The FPEIR should include a discussion and disclosure of potential impacts to biological resources from the development or redevelopment of sites for the purpose of cannabis businesses. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution,	Prior to finalizing CEQA document	Lead Agency

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Mitigation Measure	Timing	Responsible Party
population trends, and connectivity).		
Mitigation Measure #9: Fencing Plan. A fencing plan should be provided for each cannabis operation at the site level to demonstrate that wildlife entrapment and mortality and connectivity are mitigated to less than significant. Should any subsequent proposed project occur in a location that has been identified as a wildlife movement corridor or found to impede the free movement of wildlife, the FPEIR should include mechanisms at the site level to provide 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.	Prior to Project construction and activities	Lead Agency/ Applicant
Recommendation #8: Analysis of Fencing Impact. FPEIR should analyze impacts from required security measures and other fencing/barriers required for cannabis projects to animal species and wildlife movement/connectivity. The FPEIR should include information on the height, length, type of materials, maintenance requirements, and location of fencing that would be needed for cannabis businesses. The FPEIR should also provide a mechanism for analyzing and mitigating potential impacts from fencing at the individual (site) level.	Prior to finalizing CEQA document	Lead Agency

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Mitigation Measure	Timing	Responsible Party
Mitigation Measure #10: LSA. Individual businesses shall notify the California Department of Fish and Wildlife (CDFW) pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW prior to Project activities that will impact streams. For projects requiring a LSA, the Notification shall include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity. The hydrology report shall also include a hydrological evaluation of any potential scour or erosion at the Project site due to a storm event for existing and proposed conditions. Please visit CDFW's Lake and Streambed Alteration Program webpage¹⁸ for more information (CDFW 2026d).	Prior to Project construction and activities	Lead Agency/ Applicant
Mitigation Measure #11: Compensatory Mitigation. If impacts to streams are unavoidable, the cannabis business shall provide compensatory mitigation for impacts on streams and associated plant communities as part of the County land use and business license process. Any off-site mitigation shall occur where a stream supports the same plant communities impacted by the project and preferably within the same watershed.	Prior to Project construction and activities	Lead Agency/ Applicant
Recommendation #9: Analysis of Stream Crossing Impacts. The FPEIR should analyze impacts from construction, replacement, paving, and maintenance of stream crossings for cannabis business access to plant and animal species and wildlife movement/connectivity. The FPEIR should also provide a mechanism for analyzing and mitigating potential impacts from stream crossings at the individual (site) level.	Prior to finalizing CEQA document	Lead Agency

¹⁸ <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

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Attachment B: Figures and Tables

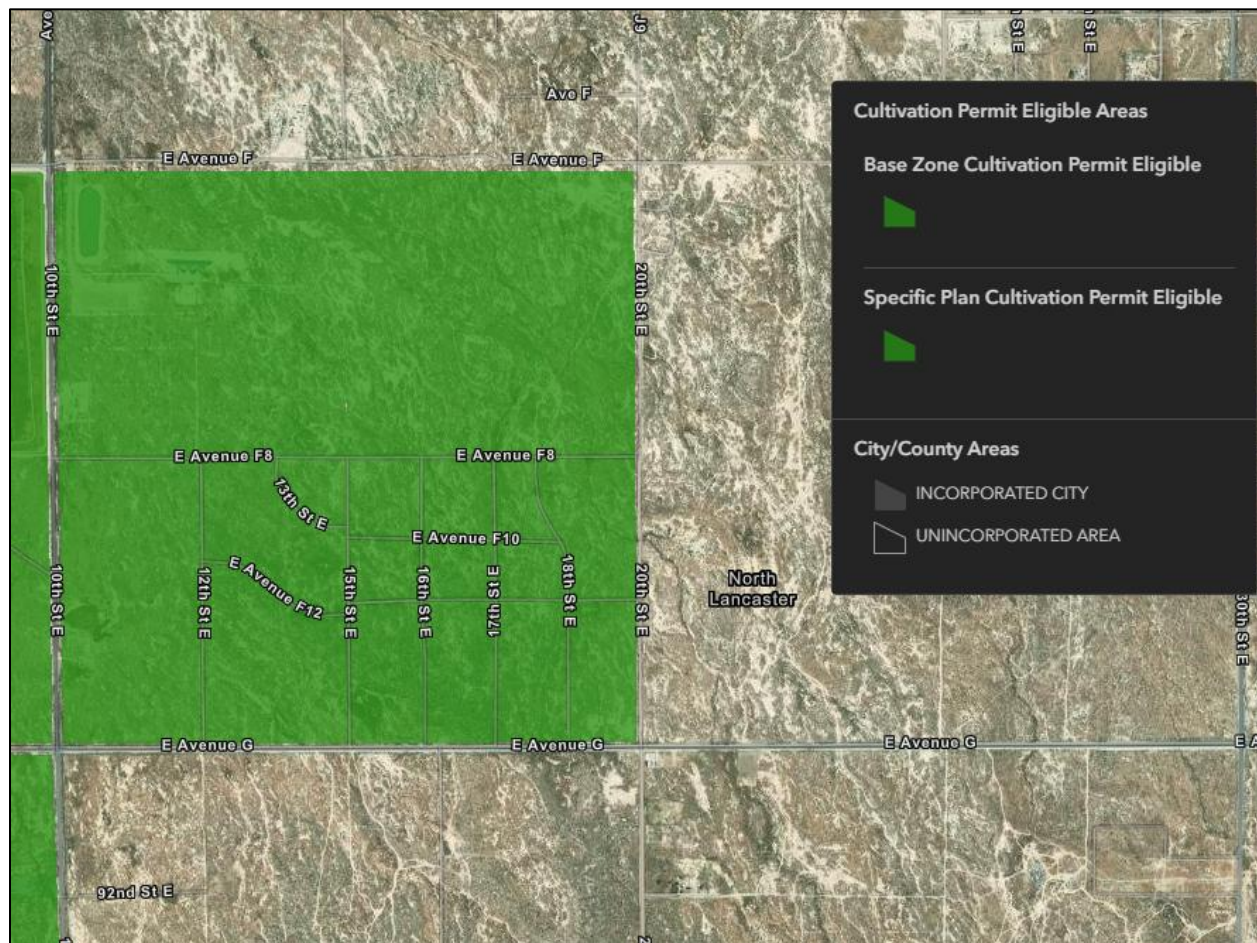


Figure 1. Map from the County's [Eligibility Zones for Commercial Cannabis in Unincorporated Los Angeles County](https://lacounty.maps.arcgis.com/apps/instant/sidebar/index.html?appid=df60d1a4b1014df7866949fe46519711)¹⁹ showing an example of undeveloped land that is eligible for commercial cannabis cultivation, non-storefront retail, testing, distribution, volatile and non-volatile manufacturing, and microbusinesses (approximately Latitude 34.742646, Longitude - 118.099724).

¹⁹ <https://lacounty.maps.arcgis.com/apps/instant/sidebar/index.html?appid=df60d1a4b1014df7866949fe46519711>

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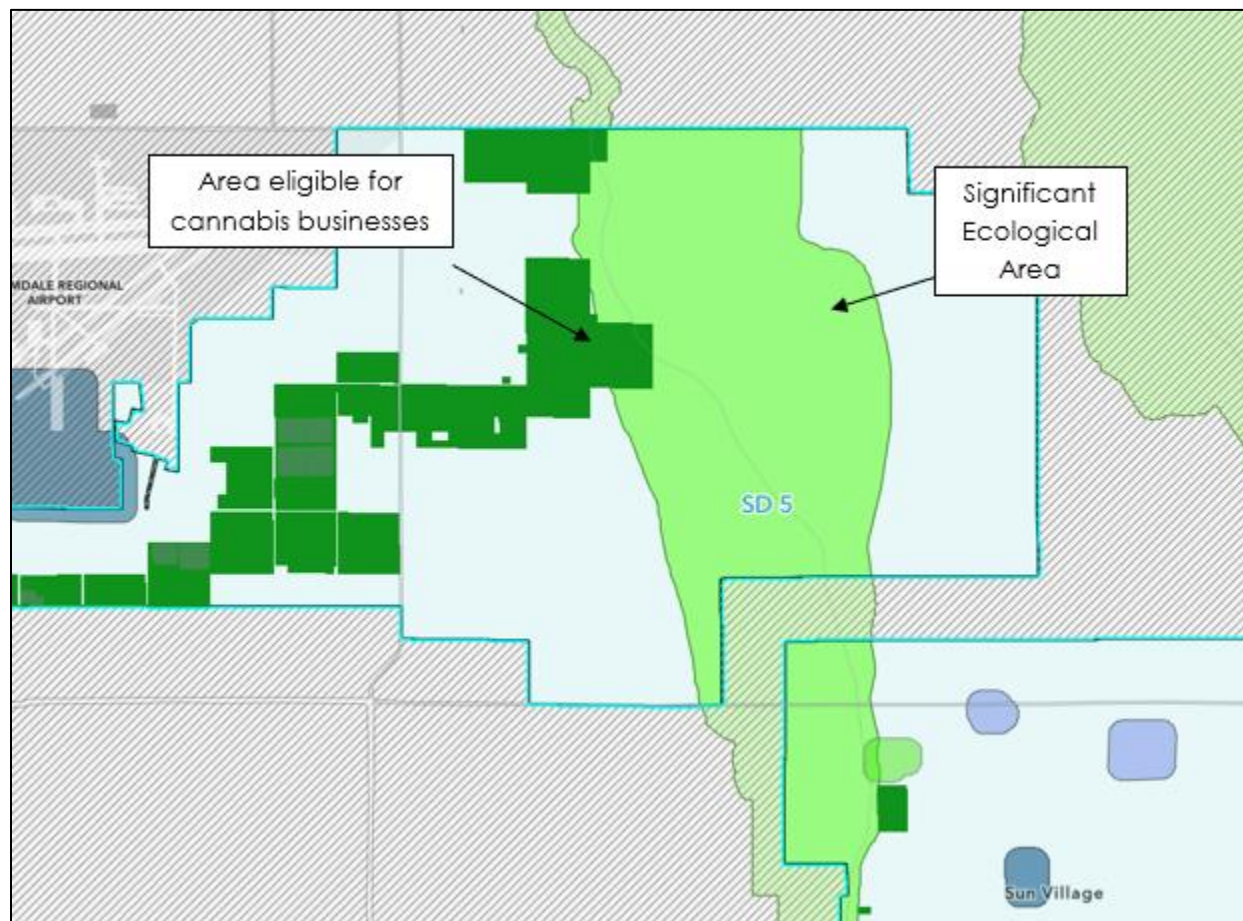


Figure 2: Map from the County's Eligibility Zones for Commercial Cannabis in Unincorporated Los Angeles County showing an example of a location within a Significant Ecological Area that is eligible for commercial cannabis cultivation, non-storefront retail, testing, distribution, volatile and non-volatile manufacturing, and microbusinesses (approximately Latitude 34.61928, Longitude -118.00811). However, this location does not meet the eligibility requirements of the PEIR as the location is within a Significant Ecological Area.

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Table 1: CNDDDB Records of Listed Species Occurring within Five Miles of the Project Area

Common Name	Scientific Name	Federal Listing Status	State Listing Status
southern mountain yellow-legged frog	<i>Rana muscosa</i>	Endangered	Endangered
foothill yellow-legged frog - south coast DPS	<i>Rana boylei</i> pop. 6	Endangered	Endangered
arroyo toad	<i>Anaxyrus californicus</i>	Endangered	SSC
western spadefoot	<i>Spea hammondi</i>	Proposed Threatened	SSC
California red-legged frog	<i>Rana draytonii</i>	Threatened	None
burrowing owl	<i>Athene cunicularia</i>	None	Candidate Endangered
bald eagle	<i>Haliaeetus leucocephalus</i>	Delisted	Endangered
least Bell's vireo	<i>Vireo bellii pusillus</i>	Endangered	Endangered
California condor	<i>Gymnogyps californianus</i>	Endangered	Endangered
southwestern willow flycatcher	<i>Empidonax traillii extimus</i>	Endangered	Endangered
California least tern	<i>Sternula antillarum browni</i>	Endangered	Endangered
Belding's savannah sparrow	<i>Passerculus sandwichensis beldingi</i>	None	Endangered
western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	Threatened	Endangered
coastal California gnatcatcher	<i>Polioptila californica californica</i>	Threatened	None
western snowy plover	<i>Anarhynchus nivosus nivosus</i>	Threatened	None
tricolored blackbird	<i>Agelaius tricolor</i>	None	Threatened
Swainson's hawk	<i>Buteo swainsoni</i>	None	Threatened
bank swallow	<i>Riparia riparia</i>	None	Threatened
California black rail	<i>Laterallus jamaicensis coturniculus</i>	None	Threatened
Riverside fairy shrimp	<i>Streptocephalus woottoni</i>	Endangered	None
vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	Threatened	None
western Joshua tree	<i>Yucca brevifolia</i>	None	Candidate Threatened
slender-horned spineflower	<i>Dodecahema leptoceras</i>	Endangered	Endangered
Nevin's barberry	<i>Berberis nevinii</i>	Endangered	Endangered
Lyon's pentachaeta	<i>Pentachaeta lyonii</i>	Endangered	Endangered
salt marsh bird's-beak	<i>Chloropyron maritimum ssp. maritimum</i>	Endangered	Endangered

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Common Name	Scientific Name	Federal Listing Status	State Listing Status
Ventura Marsh milk-vetch	<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i>	Endangered	Endangered
coastal dunes milk-vetch	<i>Astragalus tener</i> var. <i>titi</i>	Endangered	Endangered
marsh sandwort	<i>Arenaria paludicola</i>	Endangered	Endangered
San Diego button-celery	<i>Eryngium aristulatum</i> var. <i>parishii</i>	Endangered	Endangered
San Fernando Valley spineflower	<i>Chorizanthe parryi</i> var. <i>fernandina</i>	None	Endangered
Braunton's milk-vetch	<i>Astragalus brauntonii</i>	Endangered	None
spreading navarretia	<i>Navarretia fossalis</i>	Threatened	None
Agoura Hills dudleya	<i>Dudleya cymosa</i> ssp. <i>agourensis</i>	Threatened	None
Santa Monica dudleya	<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>	Threatened	None
Mt. Gleason paintbrush	<i>Castilleja gleasoni</i>	None	Rare
Santa Susana tarplant	<i>Deinandra minthornii</i>	None	Rare
Conejo buckwheat	<i>Eriogonum crocatum</i>	None	Rare
marcescent dudleya	<i>Dudleya cymosa</i> ssp. <i>marcescens</i>	Threatened	Rare
Gambel's water cress	<i>Nasturtium gambelii</i>	Endangered	Threatened
beach spectaclepod	<i>Dithyrea maritima</i>	None	Threatened
unarmored threespine stickleback	<i>Gasterosteus aculeatus williamsoni</i>	Endangered	Endangered
Mohave tui chub	<i>Siphateles bicolor mohavensis</i>	Endangered	Endangered
steelhead - southern California DPS	<i>Oncorhynchus mykiss irideus</i> pop. 10	Endangered	Endangered
tidewater goby	<i>Eucyclogobius newberryi</i>	Endangered	SSC
Santa Ana speckled dace	<i>Rhinichthys gabrielino</i>	Proposed Threatened	SSC
Santa Ana sucker	<i>Pantosteus santaanae</i>	Threatened	None
quino checkerspot butterfly	<i>Euphydryas editha quino</i>	Endangered	Candidate Endangered
Crotch's bumble bee	<i>Bombus crotchii</i>	None	Candidate Endangered
Palos Verdes blue butterfly	<i>Glaucopsyche lygdamus palosverdesensis</i>	Endangered	None
El Segundo blue butterfly	<i>Euphilotes allyni</i>	Endangered	None

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Common Name	Scientific Name	Federal Listing Status	State Listing Status
monarch - California overwintering population	<i>Danaus plexippus plexippus pop. 1</i>	Proposed Threatened	None
Pacific pocket mouse	<i>Perognathus longimembris pacificus</i>	Endangered	Candidate Endangered
Mohave ground squirrel	<i>Xerospermophilus mohavensis</i>	None	Threatened
Nelson's (=San Joaquin) antelope squirrel	<i>Ammospermophilus nelsoni</i>	None	Threatened
California Orcutt grass	<i>Orcuttia californica</i>	Endangered	Endangered
thread-leaved brodiaea	<i>Brodiaea filifolia</i>	Threatened	Endangered
blunt-nosed leopard lizard	<i>Gambelia sila</i>	Endangered	Endangered
desert tortoise	<i>Gopherus agassizii</i>	Threatened	Endangered
southwestern pond turtle	<i>Actinemys pallida</i>	Proposed Threatened	SSC
northwestern pond turtle	<i>Actinemys marmorata</i>	Proposed Threatened	SSC

Table 2: CNDDDB Records of Rare Plant Species Occurring within Five Miles of the Project Area

Common Name	Scientific Name	California Rare Plant Rank
Los Angeles sunflower	<i>Helianthus nuttallii</i> ssp. <i>parishii</i>	1A
Parish's gooseberry	<i>Ribes divaricatum</i> var. <i>parishii</i>	1A
Ballona cinquefoil	<i>Potentilla multijuga</i>	1A
Mason's neststraw	<i>Stylocline masonii</i>	1B.1
Parish's popcornflower	<i>Plagiobothrys parishii</i>	1B.1
Parry's spineflower	<i>Chorizanthe parryi</i> var. <i>parryi</i>	1B.1
Piute Mountains navarretia	<i>Navarretia setiloba</i>	1B.1
Newhall sunflower	<i>Helianthus inexpectatus</i>	1B.1
Ojai navarretia	<i>Navarretia ojaiensis</i>	1B.1
Horn's milk-vetch	<i>Astragalus hornii</i> var. <i>hornii</i>	1B.1
Malibu baccharis	<i>Baccharis malibuensis</i>	1B.1
Blochman's dudleya	<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	1B.1
Parish's brittlescale	<i>Atriplex parishii</i>	1B.1
southern tarplant	<i>Centromadia parryi</i> ssp. <i>australis</i>	1B.1
Brand's star phacelia	<i>Phacelia stellaris</i>	1B.1
Coulter's goldfields	<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	1B.1
Lancaster milk-vetch	<i>Astragalus preussii</i> var. <i>laxiflorus</i>	1B.1

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Common Name	Scientific Name	California Rare Plant Rank
San Gabriel Mountains dudleya	Dudleya densiflora	1B.1
Orcutt's pincushion	Chaenactis glabriuscula var. orcuttiana	1B.1
mesa horkelia	Horkelia cuneata var. puberula	1B.1
Rosamond eriastrum	Eriastrum rosamondense	1B.1
Nuttall's scrub oak	Quercus dumosa	1B.1
lucky morning-glory	Calystegia felix	1B.1
smooth tarplant	Centromadia pungens ssp. laevis	1B.1
Payne's bush lupine	Lupinus paynei	1B.1
slender mariposa-lily	Calochortus clavatus var. gracilis	1B.2
short-joint beavertail	Opuntia basilaris var. brachyclada	1B.2
chaparral ragwort	Senecio aphanactis	1B.2
alkali mariposa-lily	Calochortus striatus	1B.2
Ross' pitcher sage	Lepechinia rossii	1B.2
San Gabriel linanthus	Linanthus concinnus	1B.2
Robbins' nemacladus	Nemacladus secundiflorus var. robbinsii	1B.2
Palmer's mariposa-lily	Calochortus palmeri var. palmeri	1B.2
Davidson's bushmallow	Malacothamnus davidsonii	1B.2
rigid fringe-pod	Thysanocarpus rigidus	1B.2
many-stemmed dudleya	Dudleya multicaulis	1B.2
Coulter's saltbush	Atriplex coulteri	1B.2
southern mountains skullcap	Scutellaria bolanderi ssp. austromontana	1B.2
San Gabriel River dudleya	Dudleya cymosa ssp. crebrifolia	1B.2
south coast salt-scale	Atriplex pacifica	1B.2
Davidson's salt-scale	Atriplex serenana var. davidsonii	1B.2
aphanisma	Aphanisma blitoides	1B.2
intermediate mariposa-lily	Calochortus weedii var. intermedius	1B.2
coast woolly-heads	Nemacaulis denudata var. denudata	1B.2
dune larkspur	Delphinium parryi ssp. blochmaniae	1B.2
island green dudleya	Dudleya virens ssp. insularis	1B.2
prostrate vernal pool navarretia	Navarretia prostrata	1B.2
estuary seablite	Suaeda esteroa	1B.2

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Common Name	Scientific Name	California Rare Plant Rank
Catalina crossosoma	Crossosoma californicum	1B.2
San Bernardino aster	Symphyotrichum defoliatum	1B.2
Clokey's cryptantha	Cryptantha clokeyi	1B.2
coastal goosefoot	Chenopodium littoreum	1B.2
Baja navarretia	Navarretia peninsularis	1B.2
decumbent goldenbush	Isocoma menziesii var. decumbens	1B.2
California screw moss	Tortula californica	1B.2
chaparral nolina	Nolina cismontana	1B.2
San Gabriel bedstraw	Galium grande	1B.2
Sanford's arrowhead	Sagittaria sanfordii	1B.2
Big Bear Valley woollypod	Astragalus leucolobus	1B.2
San Antonio milk-vetch	Astragalus lentiginosus var. antonius	1B.3
Greata's aster	Symphyotrichum greatae	1B.3
late-flowered mariposa-lily	Calochortus fimbriatus	1B.3
southern jewelflower	Streptanthus campestris	1B.3
Raven's blazing-star	Mentzelia ravenii	1B.3
white-veined monardella	Monardella hypoleuca ssp. hypoleuca	1B.3
Mt. Pinos onion	Allium howellii var. clokeyi	1B.3
western bristly scaleseed	Spermolepis lateriflora	2A
Rocky Mountain bulrush	Schoenoplectiella saximontana	2B.1
California satintail	Imperata brevifolia	2B.1
sagebrush loeflingia	Loeflingia squarrosa var. artemisiarum	2B.2
white rabbit-tobacco	Pseudognaphalium leucocephalum	2B.2
Sonoran maiden fern	Pelazoneuron puberulum var. sonorensis	2B.2
salt spring checkerbloom	Sidalcea neomexicana	2B.2
California saw-grass	Cladium californicum	2B.2
mud nama	Nama stenocarpa	2B.2
Peruvian dodder	Cuscuta obtusiflora var. glandulosa	2B.2
Mt. Gleason paintbrush	Castilleja gleasoni	1B.2
Santa Susana tarplant	Deinandra minthornii	1B.2
Conejo buckwheat	Eriogonum crocatum	1B.2

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Table 3: CNDDDB Records of SSC Occurring within Five Miles of the Project Area

Common Name	Scientific Name
tidewater goby	<i>Eucyclogobius newberryi</i>
Santa Ana sucker	<i>Pantosteus santaanae</i>
Santa Ana speckled dace	<i>Rhinichthys gabrielino</i>
arroyo chub	<i>Gila orcuttii</i>
western mastiff bat	<i>Eumops perotis californicus</i>
coast horned lizard	<i>Phrynosoma blainvillii</i>
spotted bat	<i>Euderma maculatum</i>
California leaf-nosed bat	<i>Macrotus californicus</i>
two-striped gartersnake	<i>Thamnophis hammondi</i>
pallid bat	<i>Antrozous pallidus</i>
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>
Le Conte's thrasher	<i>Toxostoma lecontei</i>
western spadefoot	<i>Spea hammondi</i>
mountain plover	<i>Anarhynchus montanus</i>
southwestern pond turtle	<i>Actinemys pallida</i>
northwestern pond turtle	<i>Actinemys marmorata</i>
arroyo toad	<i>Anaxyrus californicus</i>
yellow-breasted chat	<i>Icteria virens</i>
yellow warbler	<i>Setophaga petechia</i>
American badger	<i>Taxidea taxus</i>
grasshopper sparrow	<i>Ammodramus savannarum</i>
western yellow bat	<i>Lasiurus xanthinus</i>
big free-tailed bat	<i>Nyctinomops macrotis</i>
western red bat	<i>Lasiurus frantzii</i>
pocketed free-tailed bat	<i>Nyctinomops femorosaccus</i>
red-diamond rattlesnake	<i>Crotalus ruber</i>
yellow rail	<i>Coturnicops noveboracensis</i>
short-eared owl	<i>Asio flammeus</i>
northern harrier	<i>Circus hudsonius</i>
loggerhead shrike	<i>Lanius ludovicianus</i>
California red-legged frog	<i>Rana draytonii</i>
Tehachapi pocket mouse	<i>Perognathus alticolus inexpectatus</i>
black swift	<i>Cypseloides niger</i>
Northern California legless lizard	<i>Anniella pulchra</i>
Southern California legless lizard	<i>Anniella stebbinsi</i>
coastal cactus wren	<i>Campylorhynchus brunneicapillus sandiegensis</i>
southern grasshopper mouse	<i>Onychomys torridus ramona</i>

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California legless lizard	<i>Anniella spp.</i>
coastal whiptail	<i>Aspidoscelis tigris stejnegeri</i>
coastal California gnatcatcher	<i>Polioptila californica californica</i>
Coast Range newt	<i>Taricha torosa</i>
California glossy snake	<i>Arizona elegans occidentalis</i>
south coast gartersnake	<i>Thamnophis sirtalis pop. 1</i>
western snowy plover	<i>Anarhynchus nivosus nivosus</i>
south coast marsh vole	<i>Microtus californicus stephensi</i>
southern California saltmarsh shrew	<i>Sorex ornatus salicornicus</i>

Comment Letter A.2 – [Victoria Tang, California Department of Fish and Wildlife]

Comment Response A.2-1

This comment provides a summary of the California Department of Fish and Wildlife's (CDFW's) regulatory authority and their role in the management of fish and wildlife resources. Further, it provides a brief overview of CDFW's understanding of the proposed Project and outlines the biological setting of the County. The County understands CDFW's roles and responsibilities regarding the conservation, protection, and management, of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. The County appreciates CDFW's review of the Draft Program EIR.

This comment expresses concerns that land development or redevelopment for cannabis projects may impact biological resources, and states that these impacts were not analyzed in the Program EIR. However, an analysis of the potential impacts on biological resources is presented in the IS (Appendix A). As discussed therein and throughout this Program EIR in Chapter 2, *Project Description* and Chapter 3, *Environmental Impact Analysis*, the proposed Project involves the development of an ordinance and amendments to existing regulations intended to establish a regulatory program for the licensing and permitting of commercial cannabis businesses within the unincorporated areas of the County. The proposed Project does not involve the development, licensing, or permitting approval of any individual commercial cannabis businesses. Please refer to Master Response 1 – Use of a Program EIR, for a detailed discussion of the programmatic nature of the proposed Project, the absence of site-specific project approvals, and the appropriate use of a Program EIR under CEQA. Please also refer to Master Response 2 – New Development, for a detailed response to concerns regarding the potential for new development under the proposed Project which could affect biological resources.

Further, as stated in the IS, under the proposed Project, 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. Commercial cannabis activities would be permitted only in existing, legally constructed and permitted structures in eligible commercial/commercial-only mixed-use, industrial, and institutional zones of the county. 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. Further, commercial cannabis activities would be prohibited in any area identified as a Sensitive Ecological Area, as well as on public lands. Finally, cannabis businesses would be subject to policies included in the General Plan / Local Coastal Program (LCP), as well as other federal, State, and local regulations regarding sensitive natural communities.

The IS also states that 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. The commenter noted that fencing may have impacts to wildlife movement. However, individual project fencing plans would be subject to County review before any cannabis permitting would occur. Given the nature of the proposed Project, limitations on development and site alterations, and requirements outlined in proposed and existing County and State regulations, impacts to biological resources were identified as less than significant, and no mitigation measures were deemed necessary to reduce or avoid a potentially significant impact. Thus, impacts to biological resources were not evaluated further in the Program EIR.

Comment Response A.2-2

This comment offers several recommended mitigation measures to address concerns for impacts to biological resources described in Comment A.2-1. However, as previously described in Comment Response A.2-1, impacts to biological resources were identified as less than significant, and no mitigation measures were deemed necessary to reduce or avoid a potentially significant impact.

Comment Response A.2-3

This comment states that undeveloped land is shown as eligible for cannabis businesses, and as these undeveloped areas would require construction of infrastructure to accommodate businesses. The comment continues that the logic for the justification of less than significant impacts hinges on sites having existing utilities. The County acknowledges that the initial eligibility maps are programmatic screening tools prepared using countywide GIS layers that were available at the time and are not intended to serve as final determinations of site eligibility. Please refer to Master Response 2 – New Development for detailed response to concerns regarding potential impacts from development of sites as a result of the proposed Project.

For a site to be eligible for commercial cannabis activities, it must be located on an eligible zoned parcel and restricted to developed lots that have existing 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 and fire) currently serving the site. An applicant that cannot demonstrate adequacy of public infrastructure, utility service, and public services would not be eligible for a license. Potential eligibly zoned sites identified in the initial eligibility maps may not be able to demonstrate such services exist to serve the proposed cannabis business, therefore making the sites ineligible.

The comment also suggests that the Program EIR should provide detail about previously-occupied buildings that could be eligible for future cannabis uses, suggesting that the proposed Project include a minimum duration for non-cannabis businesses to occupy the building or stating that the building must be existing at the time the Notice of Preparation (NOP) was published. The County appreciates these recommendations, however, as

previously described, the proposed Project includes sufficient restrictions on site eligibility and prohibitions on proposals for new development as part of the commercial cannabis business licensing process. The Program EIR is meant to provide environmental review over the proposed commercial cannabis licensing program, which would be implemented for many years to come. As such, it would not be practical to require that any buildings eligible for commercial cannabis uses must have been constructed at the time the NOP was published (March 2025). As explained further in Master Response 2 – New Development, if a developer wishes to develop or redevelop a site for commercial cannabis activities, they would be reviewed through the County's existing land use, building, and permitting processes, separate from the cannabis licensing process and before an applicant could seek a cannabis license. Depending on the type, size, location, and characteristics of the proposed development, that process may include site plan or conceptual review, Building and Safety and Fire plan check, and any other applicable permits or approvals. If a proposed development requires discretionary approval and no CEQA exemption applies, the County would conduct the appropriate CEQA review, which may include preparation of an IS and any required project-level analysis.

Further, in communities such as Altadena that experienced severe fire damage, a requirement that eligible buildings be constructed at the time of NOP publishing could potentially render those communities completely ineligible for future commercial cannabis activities. This EIR is meant to serve Los Angeles County communities for potentially decades, and must be flexible enough to build an equitable program. Policy programs thus should not ban future development, but instead use the existing regulatory framework to ensure all future development minimizes environmental impacts.

Comment Response A.2-4

This comment notes some discrepancies in the online eligibility maps and requests the maps be updated to more accurately reflect site eligibility. The County acknowledges that the initial eligibility maps referenced in the Draft Program EIR are programmatic screening tools prepared using countywide GIS layers that were available at the time and are not intended to serve as final determinations of site eligibility. These maps may contain data gaps or omissions due to limitations in source data, including the depiction of eligible sites within Significant Ecological Areas. Under the proposed Project, any potentially eligible zoned parcel that overlaps with a required buffer (i.e., no sites within Significant Ecological Areas), would not be eligible for a commercial cannabis license, regardless of what is shown in the initial eligibility maps. Prior to issuance of any cannabis license, as part of the licensing application review process, the County would ensure that applications are consistent with the proposed site eligibility and buffer requirements based on existing land uses at the time of application.

Comment Response A.2-5

This comment states that the environmental baseline described in Chapter 3, *Environmental Impact Analysis*, includes details on illegal cannabis storefront retail businesses, but should include data on the number of unpermitted cannabis cultivation sites. However, the proposed Project is not intended to remediate existing illegal cannabis operations or provide a pathway to legalize unpermitted cultivation operations. The proposed Project would only permit indoor, fully enclosed cultivation in existing legal, permitted structures in industrial zones only, whereas the majority of illicit cultivation operations take place in remote areas of the County zoned for agriculture or resource conservation. Most of these illegal operations are outdoor or mixed light cultivation sites, which would not be permitted under the proposed Project. Under the proposed Project, such activities would remain illegal and subject to enforcement by local law enforcement, as well as state and federal enforcement agencies.

Comment Response A.2-6

This comment states that the specific amendments to Titles 8 and 22 are not included in the Program EIR. Please see Master Response 3 – Description of Ordinance Amendments for a description of how the environmental review was conducted alongside ordinance updates. Please refer to Master Response 3 – Description of Ordinance Amendments for a description of how the environmental review was conducted alongside ordinance updates. The proposed ordinance amendments will be published and made publicly available in accordance with standard County protocols and presented alongside the Final Program EIR for County decision-maker review and consideration.

Comment Response A.2-7

This comment includes a request to be notified if/when the County proposes to increase the number of available licenses. The County values its partnership with CDFW and other State agencies that play a role in enforcing cannabis regulations. The County would be sure to notify CDFW, along with other responsible agencies involved in commercial cannabis permitting and enforcement, of any future modifications to the proposed program. It should also be noted that the County understands its responsibility to evaluate any future modifications to the proposed program consistent with the requirements of CEQA.

Comment Response A.2-8

This comment includes a recommendation for regular meetings between the County and CDFW regional staff to discuss permitting, enforcement, and compliance topics related to cannabis cultivation. The comment also requests the County develop a mechanism that includes CDFW and other responsible agency review to provide input on individual applications for commercial cannabis licensing and permitting as early in the process as possible. The County looks forward to future coordination with CDFW and will submit this comment to the County Board of Supervisors for consideration.



March 30, 2026

Fernando Nieto
Los Angeles County
320 W Temple St, Los Angeles,
CA 90012
(213) 712-5459
Fnieto@dcba.lacounty.gov

Re: Environmental Impact Report (SCH No. 2025030223) – Los Angeles County
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 Environmental Impact Report (EIR) prepared by the County of Los Angeles for the Los Angeles County Commercial Cannabis Business Licensing Program (Proposed Project).

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 amended EIR 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 EIR.

General Comments (GCs)

A.3-1

GC 1: Proposed Project Description

Certain comments provided in the specific comment table below relate to the need for additional detail regarding the description of the Proposed Project. In general, a more detailed project

description would be helpful to DCC. The following information would make the EIR more informative:

- 1) The types of equipment anticipated for operations and maintenance activities;
 - 2) Description of facility operations and maintenance, including:
 - a. The number of workers employed at the cultivation site;
 - b. Estimated number of weekly trips to and from the site for delivery of materials or supplies, shipment of products, and disposal of all waste generated by the Project;
 - c. Any water efficiency equipment that would be used; and
 - d. Details about proposed landscaping.
 - 3) The source (equipment) and amounts of energy expected to be used in operating the cultivation facility, including any energy management and efficiency features incorporated into the Proposed Project.
- A.3-1 cont.

The EIR should include local street maps, topographic maps, aerial photographs, site plans, property diagrams, and/or other graphics to show the existing site conditions, the Proposed Project, and the surrounding area. The site plans that are provided in the EIR are not included at a resolution or scale that would allow the reviewer to understand the general location and surrounding features, or to visualize the layout of existing and proposed features of the Project.

GC 2: 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 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 EIR 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.

A.3-2

GC 3: 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.

A.3-3

GC 4: Acknowledgement of DCC Regulations

The EIR 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

A.3-4

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)

A.3-4
cont.

GC 5: 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.

A.3-5

The EIR 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.

GC 6: Site-Specific Reports and Studies

The EIR references several project-specific plans, studies, and reports, including a Waste Management Plan; Site Management Plan; and Letter from CDFW. To ensure that DCC has supporting documentation for the EIR, DCC requests that the County advise applicants to provide copies of all project-specific plans and supporting documentation with their state application package for an annual cultivation license to DCC.

A.3-6

Specific Comments and Recommendations

In addition to the general comments provide above, DCC provides the following specific comments regarding the analysis in the EIR.

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A.3-7

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	DCC Comments and Recommendations
1	Appendix B.	B-7	Response to Scoping Comments	The EIR could be more informative if it responded to all of the comments provided by the DCC in the comment letter dated April 2, 2025. The Draft EIR responds to comments in the body of the letter with comments 8-1, 8-2, 8-3, and 8-4. The Draft EIR does not respond to DCC's comments included in the table on pages 5, 6, and 7.
2	N/A	N/A	General Mitigation	The EIR could be more informative if it provided the permit(s) or approval(s) required from each of the agencies required for cannabis cultivation.
3	N/A	N/A	Aesthetics	The EIR could be improved if it included a section for Aesthetics. The Initial Study included a section for Aesthetics, but there is no section that discusses Aesthetics in the EIR.
4	N/A	N/A	Aesthetics	The EIR 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)).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)).
5	N/A	N/A	Cultural	The EIR could be improved if it included a section for Cultural Resources. The Initial Study included a section for Aesthetics, but there is no section that discusses Aesthetics in the EIR.
6	N/A	N/A	Cultural	The EIR could be improved by including the following mitigation: "Suspend Cultivation Immediately if Cultural Resources Are Discovered, Evaluate All Identified Cultural Resources for California

A.3-7 cont.

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	DCC Comments and Recommendations
				Register of Historical Resources Eligibility, and Implement Appropriate Mitigation Measures for Eligible Resources.”
	N/A	N/A	Tribal Cultural Resources	The EIR could be improved if it included a section for Cultural Resources. The Initial Study included a section for Aesthetics, but there is no section that discusses Aesthetics in the EIR.
33	N/A	N/A	Tribal Cultural Resources	The EIR would be more informative by providing details pertaining to tribal consultations that have occurred for the Proposed Project, as required by Assembly Bill 52.
34	N/A	N/A	Tribal Cultural Resources	The EIR 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).
38	3.6	3.6-1 to 3.6-30	Transportation	The EIR 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 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

A.3-7 cont.

Comment No.	Section Nos.	Page No(s).	Resource Topic(s)	DCC Comments and Recommendations
				City/County provide applicants with supporting information relied upon in the City/County's findings, for DCC's subsequent consideration.

A.3-7 cont.

Conclusion

DCC appreciates the opportunity to provide comments on the EIR 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
Senior Environmental Scientist Supervisor

Comment Letter A.3 – [Kevin Ponce, California Department of Cannabis Control]

Comment Response A.3-1

This comment requests additional detail regarding future cannabis cultivation and other operations, including equipment types, workforce size, trip generation, water and energy use, landscaping, and site-specific mapping to better understand potential impacts. As described in Chapter 2, *Project Description*, the proposed Project is a countywide regulatory and licensing program and does not approve or authorize specific development sites or facility designs. Accordingly, project-specific information such as site plans, detailed equipment inventories, staffing levels, utility demand calculations, and landscaping layouts are not available at the programmatic stage. Please refer to Master Response 1 – Use of a Program EIR for a detailed discussion of the programmatic nature of the proposed Project, the absence of site-specific project approvals, and the appropriate use of a Program EIR under CEQA. For details on expected amounts of energy used for operating cultivation facilities and other proposed cannabis business types, please refer to Section 3.2, *Energy*.

Comment Response A.3-2

This comment asserts that the Program EIR's impact conclusions require additional substantiation and requests expanded discussion of regulatory settings, methodologies, and factual support across multiple resource areas. Please refer to Master Response 1 – Use of a Program EIR for detailed discussion of the programmatic nature of the proposed Project, the absence of site-specific approvals, and the appropriate use of a Program EIR under CEQA.

Comment Response A.3-3

This comment asserts that several mitigation measures lack specificity and enforceability, and requests greater clarity regarding how mitigation would reduce environmental impacts. As disclosed in the Draft Program EIR, the only impact identified as potentially significant under the proposed Project is Impact TR-2, related to project-level increases in vehicle miles traveled (VMT) attributable to new cannabis businesses – particularly cannabis retail uses – operating in the unincorporated County. To address Impact TR-2, the Program EIR identifies Mitigation Measure (MM) TR-1, which would require future cannabis applicants to implement Transportation Demand Management (TDM) strategies aimed at reducing VMT to the maximum extent feasible. MM TR-1 provides a programmatic mitigation framework appropriate for this Program EIR by identifying a suite of representative, feasible TDM measures derived from the County's Transportation Impact Analysis (TIA) Guidelines that may be applicable to commercial cannabis businesses, while allowing flexibility for applicants to propose alternative or equivalent measures that achieve comparable VMT reduction outcomes. Included in Chapter 8, *Mitigation Monitoring and Reporting Program* is additional detail regarding plan requirements, timing, and monitoring responsibilities for implementation of MM TR-1. As presented there, site-based TDM strategies shall be prepared by each individual commercial cannabis license applicant

and submitted as part of project application materials. County OCM and Department of Public Works Transportation Division shall review and confirm that all feasible site-based TDM measures are reflected in project plans and permit requirements. The applicant shall estimate the effectiveness of the site-based TDM measures in reducing project VMT and demonstrate to County compliance monitoring staff that all required TDM measures have been implemented.

Comment Response A.3-4

This comment requests that the EIR more clearly recognize the DCC's role as the State cannabis licensing authority and explain how DCC regulations influence environmental protections. The County recognizes DCC as the State agency responsible for licensing, regulation, and enforcement of commercial cannabis activities pursuant to the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA). The Program EIR contains the appropriate level discussion of DCC's regulatory role, licensing requirements, and operational standards that apply to future cannabis businesses, including provisions that protect environmental resources. This discussion can be found in Chapter 2, *Project Description* of the Program EIR. More specifically, Section 2.3.1, *Existing Cannabis Regulations* presents an overview of DCC's responsibilities and the requirements included in DCC licenses for commercial cannabis activities in California. Section 2.3.2, *Project Overview* also describes the proposed requirements for commercial cannabis businesses allowed under the proposed Project. This includes statements that 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. All cannabis business licenses would be subject to mandatory annual renewal with both the County and the State, and any business that fails to comply with all County and State regulations may be subject to enforcement actions, including fines, license suspension, or revocation. Where applicable to the environmental resource analysis presented in the Draft Program EIR, additional discussion of the relevant State regulations cited by the commenter has been added.

Comment Response A.3-5

This comment requests expanded analysis of cumulative impacts associated with multiple cannabis businesses countywide, including effects on transportation, air quality, noise, groundwater, and odors. The Program EIR includes a cumulative impacts analysis that evaluates the reasonably foreseeable effects of cannabis businesses operating under the proposed program, in combination with other past, present, and probable future development in the unincorporated County.

The cumulative scenario appropriately reflects the program's license caps, zoning limitations, and operational restrictions, which constrain the scale and distribution of cannabis activities. Please refer to Section 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 Sections 3.1, *Air Quality* and 3.6, *Transportation* for detailed

discussions of the potential cumulative impacts related to air quality (including odors) and transportation, respectively.

Discussion of impacts related to groundwater, stream-related resources, and noise was presented in the IS (Appendix A). As presented therein and summarized in Chapter 1, *Introduction* of the Program EIR, impacts to those resources were determined to be less than significant and were not analyzed further in this EIR.

Comment Response A.3-6

This comment requests clarification regarding how project-specific plans and studies referenced in the EIR will be provided to DCC as part of State license applications. The Program EIR does not govern State licensing procedures; however, the County agrees that applicants bear responsibility for complying with all State application and documentation requirements administered by DCC. The Final Program EIR clarifies that future cannabis applicants are responsible for preparing and submitting required project-specific documentation, such as waste management plans and operational materials to the appropriate reviewing agencies, including DCC, as part of the State licensing process. This clarification has been added to Chapter 2, *Project Description* for informational purposes.

Comment Response A.3-7

This comment consolidates concerns regarding the analysis of specific resource topics (i.e., aesthetics, cultural resources, tribal cultural resources) as well as other concerns related to mitigation measures, and prior scoping responses provided by DCC. The Program EIR builds upon the IS and scoping process, including prior responses to DCC comments submitted during NOP scoping. The scope and organization of the Program EIR reflect the programmatic nature of the proposed Project and the absence of site-specific details or applications (refer also to Master Response 1 – Use of a Program EIR). Please refer to Section 5.6, *Effects Found Not to be Significant* for a discussion of resource areas for which the proposed Project was determined to result in less than significant impacts. These resource areas were not carried forward for further analysis in the Program EIR.

With regard to DCC's prior comments included on Pages 5 through 7 of their letter submitted during the NOP scoping period, these comments either: 1) request information that has been further expanded on in the Program EIR; or 2) are otherwise not applicable because the proposed Project does not allow for any new development/ground disturbance, and/or impacts were deemed to be less than significant due to mandatory compliance with existing regulations.

This comment goes on to provide additional recommendations relating to topics of general mitigation, aesthetics/visual resources, cultural resources, tribal cultural resources, and transportation impacts. As previously discussed, impacts to aesthetics/visual resources, cultural resources, and tribal cultural resources were determined in the IS to be less than significant, and were therefore not discussed further in this Program EIR. Impacts to these resources were determined to be less than significant primarily due to the fact that the

proposed Project would not allow for new development or substantial redevelopment of existing eligibly zoned parcels for commercial cannabis activities. As described in Chapter 2, *Project Description*, commercial cannabis businesses would be permitted only in existing, legally constructed and permitted structures, and the proposed Project does not authorize new construction for cannabis uses, per Title 22 of the LACC. Any new construction or redevelopment would be subject to separate County permitting and environmental review processes independent of the cannabis licensing program. The IS also states that 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, minor site alterations would be subject to mandatory compliance with existing State and local plans, policies, and regulations applicable to the proposed site and use, including, but not limited to, County and DCC regulations governing exterior lighting.

With regard to the specific recommendation for inclusion of details pertaining to tribal consultations that have occurred for the proposed Project, a summary discussion of the results of the tribal consultation process has been added to Section 5.6, *Effects Found not to be Significant*. As presented therein, to initiate Assembly Bill (AB) 52 consultation for the proposed Project, OCM requested a contact list from the California Native American Heritage Commission (NAHC), which identified 45 tribal contacts for potential consultation.

OCM sent certified notification letters to each contact provided by the NAHC that included a summary of the proposed Project, location information, OCM contact information, and an invitation to request formal consultation. OCM also followed up by email and phone with contacts that did not initially respond to ensure adequate notice and provide additional opportunities for engagement.

Twelve tribal representatives responded by acknowledging receipt or requesting additional information, and one tribe requested formal consultation. In September 2025, OCM met with representatives of the State-recognized Native American tribe, whose ancestral lands include areas within Los Angeles County.

During the consultation, OCM provided an overview of the proposed commercial cannabis licensing program and the Program EIR process, including zoning eligibility, the environmental resource areas under evaluation, and findings from the Initial Study indicating that the program is unlikely to cause significant ground disturbance or adversely affect tribal cultural resources. OCM also shared the interactive zoning map and invited feedback. Tribal representatives did not identify additional concerns related to the proposed licensing program.

With regard to comments on transportation impacts, please refer to Comment Response A.3-3 above. The Program EIR does not identify any significant and unavoidable impacts to air quality, energy, greenhouse gas (GHG) emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, and utilities and service systems.

9.5.2 Non-Governmental Organizations and Community Groups



March 20, 2026

Delivered via Mail and Email

Los Angeles County
Department of Consumer and Business Affairs
Office of Cannabis Management
320 West Temple Street, Room G-10
Los Angeles, CA 90012
CannabisEIR@dcba.lacounty.gov

Re: Comments on Proposed Los Angeles County Cannabis Ordinance

Dear Office of Cannabis Management:

The Newhall Land and Farming Company, a wholly owned subsidiary of Five Point Holdings, LLC ("Newhall"), appreciates the opportunity to comment on Los Angeles County's proposed Cannabis Ordinance. Newhall is currently developing Valencia, a mixed-use master-planned community consisting of up to 21,500 residential units and 11.5 million square feet of planned commercial space. Valencia will offer a mix of homes, including affordable units, offices, retail, and entertainment options, while preserving 10,000 acres of open space. Valencia is among the first communities of its size to commit to net zero greenhouse gas emissions.

In our prior comment letter on the Cannabis Ordinance, attached, Newhall expressed concern that the proposal would amend the Newhall Ranch Specific Plan to allow cannabis-related businesses in certain land use areas, even though the Specific Plan was adopted by the Board of Supervisors in 2003 as the long-term planning framework for the area and a critical tool for delivering much-needed homes and jobs to the region. We also raised concerns about the proposed ministerial licensing process and the lack of local control. We asked the County to require a Conditional Use Permit ("CUP") process for any cannabis-related uses.

O.1-1

We have reviewed the current Cannabis Ordinance and are disappointed that our key prior comments were not addressed. Accordingly, we respectfully request that the County consider and incorporate the following two comments on the proposed Ordinance.

First, Newhall opposes allowing cannabis uses within the Newhall Ranch Specific Plan land use categories. The Board-approved Specific Plan underwent extensive environmental review and withstood years of legal challenges. Amending the Specific Plan to permit cannabis-related businesses in certain areas would disrupt the intended community character, residential development, and economic benefits envisioned by the Board. The approved Newhall Ranch Specific Plan should be exempted from the Cannabis Ordinance to preserve the integrity of this master-planned community.

Second, if the Board decides to approve any cannabis-related uses, such uses should be subject to a CUP. A CUP requirement would preserve the County's discretionary authority and ensure meaningful public input before cannabis operations are established in proximity to residential neighborhoods and sensitive receptors. A ministerial licensing process, by contrast,

O.1-2

would deprive the County and its residents of the opportunity to evaluate the appropriateness of individual cannabis proposals on a case-by-case basis.

We remain committed to working with the County to ensure that the proposed Cannabis Ordinance reflects our comments and stated concerns. Thank you for considering our comments.

Sincerely,



Don Kimball
Executive Vice President, Valencia

O.1-2 cont.



November 15, 2024

Delivered via Mail and Email

Los Angeles Consumer & Business Affairs
Office of Cannabis Management
Fernando Nieto, Senior Analyst
Attn: OCM
320 W Temple St., Room G-10
Los Angeles, CA 90012
cannabis@lacounty.gov

Re: Public Comment: Proposed Cannabis Business License Program

O.1-3

Dear Mr. Nieto,

The Newhall Land and Farming Company thanks you for the opportunity to provide comments on the proposed Cannabis Business License Program for unincorporated Los Angeles County. Newhall is currently developing Valencia—a mixed-use development consisting of up to 21,500 residential units and 11.5 million square feet of planned commercial space. Valencia is designed to offer a mix of homes, including affordable units, offices, retail, and entertainment options, while also devoting 10,000 acres of open space to protect native habitat. Valencia is among the first communities of its size to commit to net zero greenhouse gas emissions and is poised to become one of the most sustainable developments of its kind in the nation.

We have reviewed the draft cannabis ordinance and operating requirements by the Office of Cannabis Management. We are concerned that the proposed licensing program will adversely impact the carefully designed and previously approved Newhall Ranch Specific Plan, as well as other Valencia villages outside the Specific Plan.

Particularly, the proposal would amend the Newhall Ranch Specific Plan to allow cannabis-related businesses in certain land use areas. The Specific Plan was adopted by the Board of Supervisors in 2003 as the long term planning framework for the area and a critical tool to delivering much needed homes and jobs to the region. Mission Village, the first phase of development in the Specific Plan, is under construction, with over a thousand homes already delivered. The Specific Plan underwent extensive environmental review and withstood legal challenges. Indeed, this emerging master planned community has endured years and years of legal challenges that has only proved to increase the cost of housing for the region. For that reason, the approved Specific Plan should be exempted from any amendment, let alone from cannabis-related proposals, to avoid disrupting the intended community character, residential development, and economic benefits envisioned by the Board.

We are also concerned by the proposed ministerial licensing process and lack of local control. Newhall's villages located outside of the Specific Plan would be impacted by the proposal even if the Specific Plan is exempted. If the Board decides to approve this proposed

amendment, which we oppose, any cannabis-related uses should be subject to a Conditional Use Permit (CUP) to preserve the County's discretion and ensure public input. Adequate buffers should be required around any cannabis-related uses to avoid contact with sensitive receptors and businesses that attract members of the public. Lastly, the "Administrative Ordinance" process, which will govern the specifics of cannabis use, must be described in more detail. It is crucial that this process is fully transparent and vetted during the public review to ensure comprehensive community input and understanding.

We ask the Office of Cannabis Management to reconsider the current proposal, engage in further community outreach, and recirculate a narrower proposal for additional public review. Thank you for considering our comments. We look forward to continued dialogue on this topic.

Sincerely,



Don Kimball
Executive Vice President, Valencia

O.1-3
cont.

Comment Letter O.1 – [Don Kimball, Five Points LLC]***Comment Response O.1-1***

This comment opposes allowing commercial cannabis uses within land use categories governed by the Newhall Ranch Specific Plan, asserting that such uses would undermine a long-standing, Board-approved planning framework that was subject to extensive environmental review. The County acknowledges FivePoint's concerns regarding the relationship between the proposed Cannabis Ordinance and the Newhall Ranch Specific Plan. As described in Chapter 2, *Project Description*, the proposed Project establishes a countywide regulatory and licensing framework that applies uniformly to eligible zoning districts within the unincorporated County, including zones located within Specific Plan areas where those zones are comparable to eligible base zones under Title 22 of the LACC.

The Program EIR does not amend or modify the land use designations, development standards, or implementation framework of the Newhall Ranch Specific Plan. Rather, it evaluates the potential environmental effects of allowing cannabis businesses only where existing zoning already permits comparable commercial, industrial, or institutional uses, subject to all applicable Specific Plan standards, General Plan policies, and County land use regulations.

Whether to exempt specific areas or planning frameworks, such as the Newhall Ranch Specific Plan, from the proposed program is a policy determination that falls within the discretion of the County Board of Supervisors and is not a question of environmental adequacy under CEQA. These comments will be forwarded to the County decision-makers for their consideration.

Comment Response O.1-2

This comment requests that any cannabis-related uses be subject to discretionary review through a Conditional Use Permit (CUP), rather than a ministerial licensing process, to retain local discretion and ensure public input. The proposed Project would establish a ministerial licensing process based on fixed, objective zoning, siting, and operational standards adopted by the County. As described in Chapter 2, *Project Description*, ministerial approvals are appropriate where compliance with clearly defined requirements can be verified without discretionary judgment.

CEQA does not require discretionary review where a legislative body has determined that ministerial processing is appropriate for a regulated use. The Program EIR evaluates the environmental effects of this policy choice at a programmatic level and discloses that cannabis businesses would be allowed only in existing, legally constructed structures located in eligible zones and subject to extensive operational requirements, buffers, inspections, and enforcement provisions. Please refer to Master Response 1 – Use of a Program EIR for a detailed discussion of the programmatic nature of the proposed Project, the absence of site-specific project approvals, and the appropriate use of a Program EIR under CEQA.

While a CUP process would provide an alternative approach, the selection of ministerial versus discretionary permitting is a policy decision, not an environmental deficiency. The absence of discretionary review does not preclude public input at the legislative stage, nor does it limit the County's enforcement authority. These comments will be forwarded to the County's decision makers for their consideration.

Comment Response O.1-3

This comment includes a copy of the commenter's November 15, 2024 letter, submitted during a 45-day public comment period, held from October 1, 2024 to November 15, 2024, to gather stakeholder feedback on the proposed program, draft zoning ordinance, and business operating requirements. The letter raised concerns regarding impacts to the Newhall Ranch Specific Plan, the ministerial licensing process, buffers from sensitive receptors, and the transparency of future administrative regulations.

Issues raised during this comment period were summarized in a report submitted to the Board of Supervisors for review and consideration on February 25, 2025.¹ The comments also informed subsequent revisions to the proposed program and draft zoning ordinance.

¹ [Twelfth Quarterly Report Regarding Implementation of an Equitable Commercial Cannabis Regulatory Framework-February 25, 2025](#)

From: [Sam Arabadjyan](#)
To: [DCBA CannabisEIR](#)
Subject: Draft PEIR – Deadline March 30
Date: Thursday, March 26, 2026 2:43:46 PM

CAUTION: External Email. Proceed Responsibly.

Good afternoon,

My name is Sam Arabadjyan, with Easy Waste Management. I wanted to take a moment to share our support and appreciation for the County of Los Angeles as you move forward with the proposed Commercial Cannabis Licensing Program and the preparation of the Draft PEIR.

We are encouraged to see the County taking a thoughtful and structured approach to developing a compliant, well-regulated cannabis industry. Efforts like this are critical in ensuring environmental responsibility, public safety, and long-term sustainability for operators across all license types.

As a licensed and experienced cannabis waste hauler, our team specializes in compliant and environmentally responsible waste management solutions. We work closely with cannabis operators to ensure waste is handled in a way that not only meets regulatory requirements, but also minimizes environmental impact and promotes sustainable practices.

Our services include:

- Routine non-hazardous and hazardous cannabis waste removal
- On-site product destruction in compliance with DCC requirements
- Support for embargoed, recalled, or mandated destructions
- Secure handling, transportation, and full documentation (manifests, tracking, and reporting)
- A variety of container solutions tailored to each facility's needs

We also utilize airtight, compliant containers with proper labeling to ensure waste is securely stored, clearly identified, and handled in accordance with all state and local regulations. This helps prevent contamination, odor issues, and improper handling while maintaining full compliance throughout the waste management process.

We make every effort to divert waste from landfills whenever possible and support environmentally conscious methods such as composting and responsible material processing. Our goal is to help operators stay compliant while also contributing to a cleaner, healthier environment.

We would welcome the opportunity to serve as a resource to the County as this program continues to develop—particularly in areas related to cannabis waste handling, destruction protocols, and environmental compliance.

Thank you again for your leadership and for the opportunity to provide input.

O.2-1

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The content of this email is confidential and intended only for the recipient specified in the message. It is strictly forbidden to share any part of this message with any third party without a written consent of the sender. If you received this message in error, please reply to let us know and then delete it, so we can ensure this does not happen again.

Comment Letter O.2 – [Sam Arabadiyam, Easy Waste Management]

Comment Response O.2-1

The County appreciates the commenter's perspective and the information provided regarding cannabis waste handling services and environmentally responsible practices. These comments will be forwarded to the County's decision makers for their consideration.



March 30, 2026

Rafael Carbajal, Director of DCBA
County of Los Angeles
320 W. Temple Street, Room G-10
Los Angeles, CA 90012.
Electronic transmission of fourteen (14) pages to:
CannabisEIR@dcba.lacounty.gov

Subject: Acton Town Council Comments on the Draft Programmatic Environmental Impact Report for the Commercial Cannabis Business Licensing Program.

Dear Director Carbajal;

The Acton Town Council respectfully submits the following comments to the Department of Consumer and Business Affairs (DCBA) in response to the Draft Programmatic Environmental Impact Report (DEIR) issued for the proposed Los Angeles County Commercial Cannabis Business Licensing Program (Program). These comments are timely filed by the March 30, 2026 deadline set forth in the NOP.

THE DEIR SHOULD NOT HAVE BEEN ISSUED BEFORE THE PROPOSED TITLE 8 ORDINANCE/COMPLIANCE REQUIREMENTS WERE RELEASED.

Section 2.0 of the DEIR devotes 26 pages to describing the “project” at issue here. However, what the “project” actually consists of is just two things: an ordinance amending the Title 22 Zoning Code to allow cannabis uses, and an ordinance amending Title 8 to establish licensing and enforcement procedures, operating conditions, and monitoring requirements. CEQA requires all the elements of the “project” to be fully disclosed to the public either before or when a DEIR is issued; in this case, full disclosure means the release of both the proposed Title 22 ordinance and the proposed Title 8 ordinance. The reason is simple: without access to the proposed ordinances which comprise the “project” the public cannot assess whether they “deliver” the environmental protections that are committed to by the DEIR. Unfortunately, the County has not released any information about the Title 8 ordinance, so it is impossible to assess whether the operating, monitoring, compliance and enforcement provisions that will be included in the Title 8 ordinance will indeed mitigate environmental impacts to the extent that the DEIR alleges. Without the proposed Title 8 ordinance, the Acton Town Council is unable to provide full and comprehensive comments on the DEIR.

O.3-1

INCONSISTENCY BETWEEN THE DEIR AND THE DRAFT ORDINANCE.

The DEIR finds that at least some impacts caused by the ordinance are not minimized or reduced to a level that is less than significant; additionally (and as explained in more detail below), the Acton Town Council contends that some of the impacts deemed to be less than significant are in fact significant and that the DEIR is wrong to declare otherwise. Given that the DEIR finds that the ordinance *does* result in significant impacts on the environment and thus *does not* minimize such impacts, it is improper for the “Purpose” statement in the Title 22 ordinance to declare that the ordinance *minimizes* the “potential for adverse impacts on people, communities, and the environment”. Furthermore, *every* cannabis business authorized by the County will be ministerially approved and thus will *never* be subject to land use requirements beyond those expressly set forth in the Title 22 ordinance. In other words, the cannabis business land use restrictions imposed by Title 22 are the *only* land use restrictions that will be imposed; therefore, they are not *minimum* land use requirements. Accordingly, the “Purpose” statement claim that the Title 22 Ordinance establishes “minimum land use requirements” is substantially erroneous given that the Ordinance sets forth *all* the land use requirements that will *ever* be imposed. To correct these errors, the Acton Town Council recommends the following revision to the draft cannabis ordinance

22.140.134 Cannabis.

Purpose. To promote the health, safety, and general welfare of the County, this Section regulates legally established commercial cannabis businesses and personal use cannabis cultivation in compliance with State law. This Section establishes ~~minimum~~ **all** land use requirements for all medical and adult-use cannabis uses, including cultivation, processing, distribution, manufacturing, testing, retail sales, and microbusinesses, as defined in Chapter 22.14 of Division 2 (Definitions). Commercial cannabis businesses shall first obtain a County Cannabis License issued by the Office of Cannabis Management (OCM) before business operations commence. The regulations in this Section provide permitted cannabis uses in unincorporated areas of the County a reasonable opportunity to access legal cannabis ~~while minimizing the potential for adverse impacts on people, communities, and the environment.~~

Additionally, page 2-13 of the DEIR states “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”. This statement establishes two fundamental principles that are applicable to all the impacts which are assessed in the DEIR along with their associated mitigation measures. The first principle is that enforcement is essential for ensuring compliance with County and State regulations and that, without enforcement, compliance is not guaranteed. The second principle is that the County does not consider enforcement to be a compulsory act because the DEIR states that enforcement *may* occur which, by extension, means that it also *may not* occur. Together, these principles

O.3-2

lead to just one conclusion: because the County does not commit to enforcing any of the compliance provisions set in the County Code or in State regulations, there is no evidence to support a conclusion that the environmental impacts which result from noncompliance will be mitigated. In other words, the DEIR presumes that significant impacts will be mitigated through compliance; yet, it acknowledges that compliance is only achieved through enforcement and that the County does not consider enforcement to be a compulsory act. Accordingly, the DEIR cannot conclude that impacts will be mitigated to a level that is less than significant if the mitigation measure is contingent on compliance with applicable regulations that will not be enforced. Nonetheless, the DEIR **does** conclude that impacts of the cannabis ordinances are less than significant simply because cannabis businesses will be subject to the County Code. Such conclusions are not supported by substantial evidence. In fact, they are controverted by substantial evidence including the statement on page 2-13 which clarifies that the County does not consider enforcement (and therefore compliance) to be obligatory.

The Acton Town Council has substantial evidence proving that it is a standard County “pattern and practice” to not enforce applicable County Code provisions. For example, in the scoping comments, we provided nearly 30 pages of substantial evidence proving that Regional Planning **does not** enforce the Title 22 Zoning Code; this evidence substantiates our claim that compliance with applicable cannabis regulations in Title 22 is not guaranteed because enforcement is not compulsory. We now supplement the evidence we have already provided with additional substantial evidence showing that the DCBA and the County Department of Health **do not** enforce applicable Title 8 code provisions that fall under their jurisdiction. Specifically, Attachment 1 provides photographs taken on March 27, 2026 which show numerous food vendors in Acton that persistently and blatantly violate all Title 8 “Sidewalk Vendor” regulations for which the Health Department and DCBA are responsible. These businesses create significant traffic hazards because they induce customers to block traffic with their cars, park in red zones, even extend their tables and chairs into the County Right of Way. These businesses pose a significant wildfire danger because they cook with open flames in areas of heavy brush during windy conditions; they also operate generators sitting on the ground near brush. These businesses create significant trash impacts because they all dump their grease, food waste and trash in gullies and open space areas. For more than a year, the Acton Town Council has tried to eliminate these significant environmental impacts by getting the County to enforce Title 8 and other applicable code provisions. The County refuses. All of this proves that the County does not enforce Title 8 business codes or Title 11 health codes or Title 22 zoning codes; it also constitutes substantial evidence that the environmental impacts of the project are not mitigated simply because cannabis businesses will be subject to these codes.

O.3-2
cont.

The DEIR appears to vaguely acknowledge the importance of enforcing mitigation measures to ensure impacts are reduced to a level that is “less than significant” because it states on page 3-12 that mitigation measures **must be** “fully enforceable” through “measures incorporated directly into the adopted ordinance” such as “permitting requirements, licensing requirements, or development standards” and/or “standard conditions of approval for individual projects”. However, there is a significant difference between the “enforceability” of a mitigation measure and the “enforcement” of the mitigation measure; it only the latter which actually constructively reduces environmental impacts to a level that is “less than significant”. Accordingly, while it is likely that the measures developed by the County to mitigate environmental impacts of cannabis businesses will be enforceable, there is substantial record evidence proving that these measures will not be enforced and, by extension, that environmental impacts will not be mitigated to a level that is “less than significant”. Consistent with this principle, there is no substantial evidence to support DEIR conclusions that cannabis businesses will not result in significant air quality, public safety, or other impacts because they are subject to County Code requirements.

O.3-2
cont.

THE TITLE 22 ORDINANCE DOES NOT APPEAR TO RESTRICT CANNABIS BUSINESSES TO EXISTING BUILDINGS.

DCBA and Regional Planning previously asserted that cannabis businesses would only be permitted in existing buildings and that the “Project” would not result in any new construction. This is reflected on page 3.5-38 of the DEIR and in the “Initial Study”¹ both of which aver that cannabis businesses would only be permitted in existing structures. Because the Title 8 Ordinance has not been released, it is not known whether this restriction will be included therein (which is another reason why the County should not have released the DEIR until after the Title 8 Ordinance was issued). Moreover, the Acton Town Council has carefully reviewed the proposed Title 22 Ordinance but cannot find any restriction that limits cannabis businesses to just existing structures (though we apologize in advance if the restriction is there and we somehow missed it). This restriction does not appear in the proposed “Development Standards” set forth in Section 22.140.134. In fact, Section 22.140.134.F.4 merely states that “commercial cannabis businesses shall conduct operations entirely within an enclosed building or structure” and “cannabis businesses shall be permitted only within a permanent structure”; these statements do not restrict cannabis businesses to existing structures. Because the Title 22 Ordinance does not restrict cannabis businesses to existing structures, the DEIR cannot conclude that impacts are less than significant because cannabis businesses are restricted to existing structures.

O.3-3

¹ Pages 25, 38, and 44 of the “Initial Study” in Appendix A of the DEIR.

AIR QUALITY IMPACTS OF THE “PROJECT” ARE NOT “LESS THAN SIGNIFICANT”.

According to pages 3.1-30 to 3.1-31 of the DEIR, air quality impacts and in particular odor impacts of the “Project” are “less than significant” because cannabis businesses “would be subject to all applicable LACC regulations” including “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”. Of course, a plan is nothing more than a document and as such, it is intrinsically incapable of mitigating anything *particularly when there is no inclination to enforce the plan*. More importantly, the County has no commitment to enforcing the “LACC regulations” upon which this “finding of no significance” is based (as discussed above). Accordingly, the conclusion that odor impacts from cannabis businesses will be “less than significant” is *not supported by substantial evidence* because it is based solely on the applicability of County Code provisions which, according to the DEIR, may (or may not) be enforced.

The DEIR also claims that odor impacts will be less than significant because cannabis businesses will comply with SCAQMD and AVAQMD regulations²; however, the SCAQMD does not regulate any cannabis operations and the AVAQMD does not regulation cannabis cultivation operations³. Accordingly, any enforcement undertaken against cannabis businesses by SCAQMD and AVAQMD will be complaint driven. And, since both SCAQMD and AVAQMD odor regulations require multiple complainants over a substantial period of time⁴, they can take more than a year to resolve and there will not even be an investigation unless “a considerable number” of people complain. Meanwhile, significant odor impacts will persist throughout the “odor investigation” (if there even is an investigation). And in those instances where the District with jurisdiction concludes that there are not sufficient complainants to satisfy the “considerable number of people” standard, no investigation will be done and no odor control requirements will be imposed; under such circumstances, the significant air quality (odor) impacts will be permitted to continue *with impunity*.

² SCAQMD has not promulgated any rules for cannabis operations; however, Rule 425 to regulate cannabis businesses may be developed someday. https://www.aqmd.gov/docs/default-source/agendas/governing-board/2026/2026-mar6-013.pdf?sfvrsn=1158697e_2.

³ AVAQMD merely requires an odor control plan for cannabis cultivation; no pollution control is required. However, “plans” are intrinsically incapable of mitigating anything.

⁴ Neither the SCAQMD nor the AVAQMD investigate odors until a “considerable number of people” file complaints [<https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf?sfvrsn=4>, <https://www.avaqmd.ca.gov/files/597409879/AV402+1976+07+Apr+reformatted.pdf>]. Only after multiple complaints from multiple individuals are received will SCAQMD and AVAQMD launch an odor investigation *which takes months and even years*. After the investigation, it is not a certainty that emission controls will be required. As the AVAQMD states “the District *may* require a public or nuisance odor to be abated in response to an odor investigation, which *may* effectively require an odor control device” (emphasis added) [<https://www.avaqmd.ca.gov/files/0e7d9f545/FAQ+Cannabis+2020.pdf>].

In a nutshell, because there is no guaranteed enforcement of Title 8, Title 11, and Title 22 County Code provisions, and because SCAQMD has no substantive compliance requirement for any cannabis businesses and AVAQMD has no substantive compliance requirements for cannabis cultivation operations, there is no substantial evidence to support the conclusion set forth in the DEIR that air quality (odor) impacts from the “project” will be reduced to a level that is “less than significant”. The DEIR is fatally flawed in concluding otherwise. Furthermore, this fatal flaw precludes the County from making the finding required by CEQA Guidelines Section 15091 that odor and air quality impacts will be less than significant because such a findings must be supported by substantial evidence. Equally important, the County’s established pattern and practice of not enforcing applicable code provisions constitutes substantial evidence that significant air quality/odor impacts *will* occur because the Health Department *will not* enforce any “odor control plans” and the DCBA *will not* rescind or revoke the license of any cannabis business that does not comply with its “odor control plan”. Accordingly, the County must find that the “project” will result in significant air quality impacts and adopt a statement of overriding considerations pursuant thereto.

O.3-4
cont.

THE DEIR IGNORES THE SIGNIFICANT PUBLIC SAFETY IMPACTS THAT WILL RESULT FROM THE “PROJECT”.

The “Scoping Comments” provided by the Acton Town Council expressed substantial concern regarding public safety impacts and in particular, we provided substantial evidence that cannabis businesses will pose a significant public safety threat in rural areas where sheriff department response is often substantially delayed. We also expressed concerns that, because every conceivable type of cannabis business will be permitted on M-1 land and because all the M-1 zoned properties in Acton are in residential neighborhoods and because cannabis businesses always have armed guards and are targeted by armed criminals, the “Project” poses a direct and substantial public safety risk to Acton residents. The Acton Town Council specifically requested that the EIR address these safety concerns in the hope that mitigation measures would be offered. Our request was ignored. Worse yet, the DEIR does not even consider such public safety concerns even though the initial study affirms that crimes associated with permitted cannabis activities will likely occur particularly at cultivation and retail facilities⁵! All of this renders the DEIR is substantially deficient.

O.3-5

⁵ Page 61. The Initial Study dismisses such concerns because cannabis businesses are limited to existing structures and because a pathway is provided for legal operations. These reasons are not substantive or dispositive. Sheriff response and public safety are intrinsically intertwined *particularly in incidents that involve armed criminals and occur in remote rural areas that already have long sheriff response delays*; thus, it is irrelevant that cannabis businesses are limited to existing buildings. Furthermore, developers frequently initiate “bait and switch” scams where they get County approval to construct a building for one alleged purpose and then turn around and submit an application to use the structure for an entirely different purpose. This is how developers will sidestep the “existing structure” requirement.

The DEIR asserts that Policy S 7.1 and Policy S 7.5 from the Safety Element of the County General Plan are applicable to the “Project”; Policy S 7.1 states “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” and Policy S 7.5 states “Ensure that there are adequate resources, such as sheriff and fire services, for emergency response”. However, the DEIR does not explain how the “Project” is consistent with these policies. Perhaps this is because the “Project” actually controverts these policies. For instance, the “Project” allows the conversion of an existing structure in a residential area that is established with an existing benign use which does not attract armed criminals or pose explosion or wildfire risks into a cannabis business that requires armed security guards and even utilizes dangerous solvent extraction processes. Accordingly, the “Project” does not ensure residents “are protected from public health consequences” of “human-made disasters”; to the contrary, it invites “human-made disasters” into residential areas!

O.3-5
cont.

Furthermore, because the “Project” establishes a ministerial approval process for all cannabis businesses, there will never be any consideration given to whether any cannabis business location has “adequate resources, such as sheriff and fire services, for emergency response”. And, because the DEIR completely ignores these public safety concerns and never addresses whether the locations identified for future cannabis business development have adequate sheriff and fire services, there is no substantial record evidence which shows the “Project” is consistent with these policies. In fact, the evidence provided by the Acton Town Council shows that the “Project” controverts these policies because it authorizes ministerial approval of all cannabis businesses with no regard for fire or sheriff resources! Furthermore, because Policies S 7.1 and S 7.5 were adopted for the purpose of reducing environmental impacts⁶, and because the “Project” is inconsistent with these policies, it can be argued that these inconsistencies are significant environmental impacts that must be addressed in the DEIR⁷.

⁶ It is self-evident from the language in Policy S 7.1 that it was adopted for the purpose of reducing the environmental impacts of development (particularly hazard and safety impacts) because its whole purpose is to ensure the safety of residents. It is also self-evident from the language in Policy S 7.5 that it was also adopted for the purpose of reducing environmental impacts. Furthermore, the environmental document that was certified when the Safety Element was adopted in 2022 states that Policy S 7.1 was adopted to ensure “that there are enough sheriff and fire services that can handle emergency response situation” and that adequate “emergency response coverage exists” (page 22) and that “required fire suppression and other emergency response services for the County” are provided (page 64).

⁷ Courts have held that an inconsistency between a proposed project and an adopted General Plan Land Use Policy will implicate CEQA when the Policy was adopted for the purpose of mitigating environmental impacts (*Joshua Tree Downtown Business Alliance v. County of San Bernardino* 1 Cal.App.5th 677; *Pocket Protectors v. City Of Sacramento* 124 Cal.App.4th 903). It is a logical extension to conclude that inconsistencies with other general plan policies would also constitute significant environmental impacts.

The DEIR claims on page 3.5-28 that the “Project” is consistent with General Plan Policy PS/F 1.1 which “discourage[s] development in areas without adequate public services and facilities” because the DEIR asserts that the “Project” is limited to “suburban and urban areas” that have “existing public services and facilities” including “sewer, solid waste, law enforcement, fire services, emergency response, and transportation/circulation systems that facilitate multiple modes of transportation”. However, Acton is not an urban or suburban area, it does not have sewers, it does not have law enforcement, it does not have a “circulation system” that has multiple modes of transportation”, and the fire department is quite small. Accordingly, the “Project” is inconsistent with General Plan Policy PS/F 1.1 and this inconsistency constitutes a significant environmental impact that must be mitigated before the “Project” can be approved.

O.3-5
cont

THE “PROJECT” WILL RESULT IN SIGNIFICANT LAND USE IMPACTS.

The Acton Town Council notes several deficiencies in the DEIR pertaining to land use impacts. For example, the DEIR states on page 3.5-18 that the “Project” is consistent with several Land Use Policies adopted in the County General Plan because “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”. This statement is categorically false. The “Project” allows every conceivable type of cannabis business throughout the Community of Acton which is neither an urban nor a suburban area and these locations do not have “existing multimodal transportation infrastructure”. Page 3.5-19 states that cannabis businesses would be “established urban and suburban areas of Los Angeles County that have existing public utilities and services”. This statement is categorically false. Acton is not an urban or suburban area and, as explained above, it has no dedicated Sheriff presence and only a small fire department.

O.3-6

Perhaps worst of all, the DEIR claims that the “Project” is consistent with Land Use Policy LU 7.1 which calls for buffers to “reduce and mitigate the impacts of incompatible land uses”; the DEIR claims consistency with Policy LU 7.1 because the “Project” imposes a 600 foot buffer between cannabis businesses and “youth-oriented uses”. However, Policy LU 7.1 is *not* just concerned with buffers for “youth-oriented uses”; to the contrary, it requires buffers for *all* uses that are intrinsically incompatible with cannabis businesses because of the armed guards they employ, the significant odors that they create, and the explosion potential that is posed by their solvent based extraction operations. Because these are all characteristics of cannabis businesses, and because these characteristics are all intrinsically incompatible with residential uses, Policy LU 7.1 *compels* the County to require at least some buffer distance around residential areas. To ensure consistency with Policy LU 7.1 for *all* incompatible land uses and not just

“youth-oriented uses”, the Acton Town Council recommends that the “Project” include a buffer of at least 200 feet for residential uses because of the intrinsic incompatibility between residential and cannabis business uses. Anything less would result in a substantial inconsistency with Land Use Policy LU 7.1. And, given that Land Use Policy LU 7.1 was adopted for the purpose of mitigating environmental impacts⁸ and that the “Project” is substantially inconsistent with Policy LU 7.1 because it fails to provide buffers for incompatible residential uses, this inconsistency constitutes a significant environmental impact⁹ that must be mitigated before the “Project” is approved.

The DEIR also claims on page 3.5-19 that the “Project” is consistent with Land Use Policy LU 6.1 that protects “rural communities from the encroachment of incompatible development that conflict with existing land use patterns and service standards” because the “Project” will only locate cannabis businesses “in established urban and suburban areas of Los Angeles County that have existing public utilities and services”. This statement is categorically false. The “Project” authorizes every conceivable type of cannabis business throughout the Community of Acton which is not an urban or suburban area; to the contrary, it is a designated rural community under every land use standard adopted by the County. Furthermore, Acton does not have the “services” that are needed to support cannabis business development: we have no Sheriff presence, our Fire Department is very small, we have no sewers, and our roads are almost all dirt. The “Project” is not consistent with Land Use Policy LU 6.1, and because Land Use Policy LU 6.1. was adopted for the purpose of mitigating environmental effects¹⁰, this inconsistency constitutes a significant environmental impact that must be mitigated before the “Project” is approved.

The DEIR also claims on page 3.5-30 that the “Project” is consistent with General Plan Policy ED 2.2 which requires the use of “adequate buffering and other land use practices to facilitate the compatibility between industrial and nonindustrial uses”. However, the “Project” provides no buffers between industrial cannabis operations and residential uses *even though residential uses are intrinsically incompatible with cannabis operations* (as explained in detail above). This is particularly true in Acton where there is nearly 100 acres of industrially zoned land and *all of it* is within residential areas. The “Project” is substantially inconsistent with General Plan Policy ED 2.2, and this inconsistency constitutes a significant environmental impact that must be mitigated.

⁸ Policy LU 1.7 and other policies (such as EDD 2.2) were adopted to “reduce adverse effects”. Pages 5.10-11 to 5.10-32.

⁹ A potentially significant environmental impact exists when a proposed project is inconsistent with a General Plan Policy that was adopted for the purpose of mitigating environmental impacts [*Joshua Tree Downtown Business Alliance v. County of San Bernardino* 1 Cal.App.5th 677, *Pocket Protectors v. City Of Sacramento* (2004) 124 Cal.App.4th 903].

¹⁰ Policy LU 6.1 was adopted to “reduce adverse effects”. Pages 5.10-11 to 5.10-17.

CANNABIS MANUFACTURING IN RURAL, HIGH FIRE HAZARD AREAS WILL RESULT IN SIGNIFICANT PUBLIC SAFETY IMPACTS.

The Title 22 ordinance allows cannabis manufacturing (including solvent-based extraction operations also known as volatile extraction operations) in rural, residential, and very high fire hazard areas despite the explosion and wildfire risks and hazards that they pose. The DEIR sets forth various why such impacts should be deemed “less than significant”; however, the following paragraphs explain how these reasons are not supported by substantial evidence.

Reason 1 on Page 3.4-22. All cannabis business types are “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)”. What this statement fails to account for is that the industrial properties in Acton where cannabis manufacturing is permitted *do* have substantial numbers of sensitive receptors because they are in residential neighborhoods; they also have fuel load characteristics that *do* exacerbate hazardous conditions because they are all VHFHSZs. Accordingly, the claims made in this statement are not applicable to Acton and they do not constitute substantial evidence that the “Project” will have “less than significant” hazard risks.

Reason 2 on Page 3.4-22. Because cannabis businesses are subject to buffer requirements from youth oriented uses, rehab facilities, and cannabis retail businesses, this will “limit the potential for the routine use of hazardous materials to adversely affect the public and the environment”. The fallacy in this statement is that “the public” does not consist solely of youth oriented uses, rehabs, and other cannabis businesses. Thus, while buffers which protect youth oriented uses, rehabs, and other cannabis businesses may be effective at protecting the small portion of the public that is represented by youth oriented uses, rehabs, and other cannabis businesses, they are ineffective at protecting the broader public and they are certainly useless at protecting residences (which, incidentally, are defined as a “sensitive use” under the Zoning Code). Accordingly, while the claim made in this statement does constitute substantial evidence that the “Project” will have “less than significant” hazard impacts on the youth oriented uses, rehabs, and other cannabis businesses, it does not constitute substantial evidence that “Project” will have “less than significant” hazard impacts on the public. This is particularly true in rural communities like Acton where industrial properties are in residential neighborhoods and all of it is in a VHFHSZ.

Reason 3 on Page 3.4-22. Because cannabis businesses are governed by a regulatory framework, the “potential for the routine use, storage, transport, and disposal of hazardous materials to create substantial hazards to the public” is minimized. However, there is no commitment by the County to actually enforce the “regulatory framework”

O.3-7

that the “Project” creates. Moreover, the mere existence of a “regulatory framework” for cannabis manufacturing operations is not dispositive, and it certainly does not constitute substantial evidence that the public safety and wildfire hazards posed by cannabis manufacturing will be “less than significant”.

Reason 4 on Page 3.4-23. The “Project” restricts cannabis manufacturing to industrial zones which minimizes “risks resulting from potential, accidental exposure to sensitive receptors and ensuring land use compatibility”. This argument fails to take into consideration that, in rural communities like Acton, individual industrial lots are actually *inside* residential neighborhoods and are thus adjacent to, and even surrounded by, sensitive land uses. Accordingly, the “Project” does not “ensure land use compatibility” in rural communities and it certainly does not minimize “risks resulting from potential, accidental exposure to sensitive receptors”. Accordingly, the restriction of cannabis manufacturing to just industrial zones does not “minimize” the risks of potential accidental exposure to sensitive receptors in rural areas; therefore, it does not constitute substantial evidence that the “Project” will have “less than significant” hazard risks.

Reason 5 on Page 3.4-23. The adverse impacts of a hazardous release during an operational upset or accident (such as an explosion at a solvent extraction plant) is minimal because all cannabis businesses are “subject to federal, state, and local Regulations”. However, the County is not committed to enforcing such regulations; therefore, the mere existence of such regulations is not dispositive and it certainly does not constitute substantial evidence that significant adverse impacts from operational upset or accident are “less than significant”

Reason 6 on Page 3.4-23. The adverse impacts of a hazardous release during an operational upset or accident (such as an explosion at a solvent extraction plant) is minimal because all cannabis businesses are “subject to federal, state, and local Regulations”. However, the County is not committed to enforcing such regulations; therefore, the mere existence of such regulations is not dispositive and it certainly does not constitute substantial evidence that significant adverse impacts from operational upset or accident are “less than significant”

Reason 7 on Page 3.4-23. The “Project” will “ensure separation of hazardous materials from sensitive uses” and thereby “reduce the risk of exposure during an accidental release” because it provides buffers for a small subset of land uses. However, the “Project” **does not** ensure separation of hazardous material from sensitive uses. To the contrary, it authorizes cannabis manufacturing and solvent extraction operations right next door to residences! This *fact* is evident from the DCBA map titled “Eligibility Zones for Commercial Cannabis in Unincorporated LA County” which shows homes are

O.3-7
cont.

adjacent to nearly all the lots where cannabis manufacturing is permitted in Acton. An excerpt of this map is provided in Figure 1. Because the buffers established by the “Project” do not “ensure separation of hazardous materials from sensitive uses”, there is no substantial evidence to support a conclusion that the buffers ensure that adverse impacts from exposure during an accidental release are “less than significant”.

Figure 1. Excerpt from the DCBA Map of Commercial Cannabis Eligibility Zones.



O.3-7
cont.

Reason 8 on Pages 3.4-23 to 3.4-24. Because the “Project” initially limits the number of cannabis manufacturing licenses in each General Plan Planning Area, the “risk of significant exposure to hazardous materials in the event of an accidental release or emergency condition” is lowered because there will be no overconcentration. This is a strawman argument. A single manufacturing facility in Acton poses a significant hazard exposure risk during an accident or emergency condition; this significant hazard risk to Acton residents is not reduced or in any way altered by the fact that, for the time being, only a certain number of licenses are permitted in the Antelope Valley Planning Area. Accordingly, imposing a limiting on the number of cannabis manufacturing licenses that are issued does not reduce the public safety hazard posed by each manufacturing facility and it certainly does not constitute substantial evidence that the public safety hazard posed by each manufacturing facility is “less than significant”.

Reason 9 on Page 3.4-24. Existing and new regulations and buffers will “prevent significant impacts associated with hazardous emissions, materials, substances, and/or wastes, to schools and/or sensitive uses.” While a 600 foot buffer around schools may help reduce impacts of hazardous emissions on schools, the “Project” provides no buffers for other sensitive uses, including residences. Accordingly, the “hazardous emissions, materials, substances, and/or waste” impacts on sensitive residential

receptors that are created by the “Project” will remain significant and unmitigated and there is no substantial evidence to support a contrary conclusion.

Reason 10 on Pages 3.4-24 to 3.4-25. The “Project” will not expose sensitive uses to hazardous emissions or materials or waste because cannabis manufacturing is restricted to industrial lots that “typically do not include” large number of residents. This statement is so troubling that it is difficult to know where to begin. As explained above, industrial properties in Acton are surrounded by residences, so restricting cannabis manufacturing to industrial lots does not protect sensitive uses. Furthermore, what makes an environmental impact significant is not whether it affects “large numbers” of people; rather, it is the magnitude of the effect itself regardless of the number of people who experience the effect. The attitude behind this argument is alarming; it suggests that an impact is less than significant when only a handful of people experience a significant impact. That is not how CEQA works. A significant impact is a significant impact regardless of the number of people who experience it. It is an undisputed fact that a hazardous release or explosion at a cannabis manufacturing operation on an industrial lot in Acton will substantially and adversely affect the surrounding residents. That is the only relevant standard, and these impacts are not reduced simply because the impact does not involve a “large number” (whatever that means).

O.3-7
cont.

Reason 11 on Pages 3.4-26 to 3.4-27. The “Project” will not expose the public to a risk of wildland fire or create a potentially dangerous fire hazard because cannabis manufacturing will comply with the fire code. However, compliance with the fire code is not a panacea; plenty of structures that comply with the fire code catch on fire anyway. Therefore, compliance with the fire code is not sufficient to support a conclusion that fire and wildfire impacts are less than significant. Equally important, the risks of fire and wildland fire are exacerbated by locational circumstances. For instance, a fire in an industrial building in an urban or suburban area that is surrounded by other industrial buildings is unlikely to spread. However, that same fire in an industrial building that is isolated and surrounded by dry chaparral and homes is likely to spread and ignite a very dangerous wildfire particularly during windy conditions. Fire and wildfire impacts differ considerably across locations; yet, the “Project” fails to take any of this into account. In short, there is simply no substantial evidence that the fire and wildfire impacts posed by the “Project” are reduced to a level that is “less than significant”.

DCBA PERSISTENTLY IGNORES THE PRIVATE SCHOOL APPROVED AT ACTON FAITH BIBLE

For reasons that have never been made clear, the cannabis maps that DCBA has prepared persistently ignore the approved private school operated by the “Acton Faith Bible” organization located on APN 3208-011-052. The school is adjacent to a large

O.3-8

industrially zoned area and it must be recognized to prevent cannabis business development in these areas.

THE TITLE 22 ORDINANCE DOES NOT RESTRICT THE NUMBER OF LICENSES THAT WILL BE ISSUED

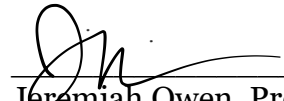
The DEIR is premised on the assumption that only 90 cannabis licenses will be issued (page 1-7); these licenses are supposed to be evenly distributed throughout the five supervisorial districts. However, no such restrictions are found anywhere in the draft Title 22 ordinance. Additionally, the County still has not released the Draft Title 8 ordinance, so it is impossible for the public to assess whether this fundamental assumption expressed in the DEIR will indeed be implemented by the County. This is another reason why the Acton Town Council believes that the DEIR has been released prematurely; it is also why we believe that the public should be permitted to file additional comments on the DEIR after the Title 8 ordinance is finally released.

O.3-9

CONCLUSION

The Acton Town Council hopes that DCBA and Regional Planning considers the comments provided herein and makes adjustments to the DEIR and the County Code to address our concerns. If you have any questions, please do not hesitate to contact the Acton Town Council at atc@actontowncouncil.org

Sincerely;


Jeremiah Owen, President
The Acton Town Council

ATTACHMENT 1

PHOTOGRAPHS TAKEN MARCH 27, 2026 OF FOOD VENDORS IN ACTON THAT VIOLATE TITLE 8 “SIDEWALK VENDOR” REGULATIONS





Comment Letter O.3 – [Jeremiah Owen, Acton Town Council]***Comment Response O.3-1***

This comment asserts that the Draft Program EIR should not have been released before the proposed Title 8 ordinance was circulated, arguing that the absence of finalized operating and enforcement provisions prevents meaningful public review of environmental protections. Please refer to Master Response 3 – Description of Ordinance Amendments for more details on why the ordinance amendments were not specifically included in the Program EIR.

Comment Response O.3-2

This comment argues that statements in the Program EIR regarding minimization of impacts and enforcement are inconsistent with the purpose and provisions of the proposed Title 22 ordinance. The comment also asserts that impacts cannot be reduced without guaranteed enforcement. The Program EIR acknowledges that certain impacts, most notably transportation-related VMT impacts, would remain significant and unavoidable, and it does not assert that all impacts would be fully eliminated. For all other environmental resource areas; however, the IS and Program EIR demonstrate that impacts would be avoided, minimized, or reduced to a less-than-significant level through the proposed restrictions and/or regulatory requirements.

As presented in the IS and Program EIR, the proposed Project includes specific restrictions and regulatory requirements that would avoid or minimize environmental impacts. With the exception of transportation-related VMT, all potential impacts were determined to be less than significant with implementation of the proposed Project. This outcome is due to the reliance on existing regulations and permitting requirements, as well as the proposed Title 22 standards, which are designed to limit the scale and location of cannabis uses and reduce the potential for physical environmental effects.

In compliance with the proposed Title 22 amendments, approval of a Site Plan Review (a type of ministerial zoning permit) would be a mandatory component of each cannabis business license. By their nature, each proposed license must be consistent with fixed, objective standards and regulatory requirements that extend beyond the land use regulations of the ordinance (e.g., building standards, consumer protection business and wage regulations of Title 8, zone-specific standards of Title 22, Department of Public Health [Title 11], and licensing, operating, reporting, and inspection requirements from DCC). If an applicant cannot demonstrate consistency with all applicable requirements and provisions, the application cannot be approved, and the business cannot be permitted and licensed.

The Program EIR's conclusion regarding impact minimization is therefore not dependent on speculative enforcement, but on the mandatory implementation of these regulatory requirements as a condition of approval for the proposed Project. For example, as discussed in in detail in Chapter 2, *Project Description*, commercial cannabis businesses licensed under the proposed Project would be subject to various regulations governing site eligibility,

including requirements that cannabis operations be limited to existing, legally constructed, permitted, and permanent structures. This requirement substantially avoids potential physical environmental effects by precluding new ground disturbance, grading, or construction activities that could otherwise impact biological resources, cultural resources, hydrology, and other environmental resource areas. Please also refer to Master Response 2 – New Development for detailed response to concerns regarding potential for new development under the proposed Project.

Comment Response O.3-3

This comment asserts that the Program EIR incorrectly concludes cannabis businesses would be limited to existing structures because this restriction is not expressly stated in the draft Title 22 ordinance language. Please refer to Master Response 2 – New Development for detailed discussion of the potential for new development under the proposed Project.

Comment Response O.3-4

This comment contends that odor impacts would be significant because odor control plans and air district regulations would not be effectively enforced. Chapter 11.37 of the LACC, administered by the Los Angeles County Department of Public Health, Environmental Health Division, requires commercial cannabis retail, distribution, manufacturing, and cultivation businesses to obtain a Public Health Permit. Among other requirements, applicants and licensees must submit an odor management plan describing the measures that will be used to prevent odors from being detected outside the facility or indoor cultivation site.

Operators are responsible for implementing the odor management plan, maintaining records related to odor control, including system malfunctions and complaints, and making modifications to the odor management plan when required following an inspection. If modifications are made that may affect odor control, an updated odor management plan must be submitted to the Environmental Health Division within 30 days. The Environmental Health Division may also require corrections within a reasonable period of time, as determined by the Division.

Please refer to Master Response 4 – Public Safety, Code Enforcement, and Crime for further information on how the County would enforce compliance by licensed businesses.

Comment Response O.3-5

This comment asserts that the proposed Project would create significant public safety risks in rural areas such as Acton due to delayed emergency response, armed security, and potential criminal activity. Please refer to Master Response 4 – Public Safety, Code Enforcement, and Crime.

Comment Response O.3-6

This comment alleges that the proposed Project is inconsistent with multiple General Plan policies and requests additional buffers from residential uses. The Program EIR includes a detailed analysis of General Plan consistency and concludes that the proposed Project is consistent with applicable land use policies when evaluated at a countywide programmatic scale. As described in Section 2.3.2, *Existing Cannabis Regulations*, all cannabis businesses would be located only within eligible commercial, commercial-only mixed-use, industrial, and institutional zones and subject to limitations on maximum concentrations within each of the five Supervisorial Districts and established Planning Areas.

Consistent with Policy LU 7.1, which calls for reducing and mitigating impacts of incompatible land uses through buffers, building enclosure, and other design techniques, under the proposed Project commercial cannabis businesses would be allowed only in existing, legally-established buildings in commercial, industrial, institutional, and commercial-only mixed-use zones deemed suitable for the proposed cannabis activity. The proposed Project would also prohibit commercial cannabis businesses 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, licensed game arcades, and Drug Abuse and Recovery Treatment Centers. In addition, cannabis storefront retail businesses would be prohibited within 500 feet of another cannabis storefront retail business.

Regarding the Program EIR's analysis of consistency with Policy LU 6.1, the County acknowledges the rural setting of the community of Acton and clarifies that for a site to be eligible for commercial cannabis activities, it must be located on an eligible zoned parcel and restricted to developed lots that have existing 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 serving the site. An applicant that cannot demonstrate adequacy of public infrastructure, utility service, and public services would not be eligible for a license. Potentially eligible zoned sites in the community of Acton and other rural communities may not be able to demonstrate such services exist to serve the proposed cannabis business, therefore making rural sites ineligible. For these reasons, the Program EIR's discussion of consistency with policies of the General Plan emphasizes that commercial cannabis activities would be allowed in urban and suburban areas of the County where such services exist.

The proposed Project is also consistent with Policy ED 2.2 which requires the utilization of adequate buffering and other land use practices to facilitate the compatibility between industrial and non-industrial uses. As discussed in Chapter 3.5, *Land Use and Planning*, Section 3.5.4, *Environmental Impact Analysis*, only industrially compatible cannabis activities (e.g., indoor cultivation, manufacturing, and distribution) would be permitted within industrial zones. Commercial cannabis businesses would be subject to the same buffering requirements identified above, including mandatory 600-foot separations from

youth-oriented uses, as well as compliance with zoning, site plan review, and operational requirements that govern noise, lighting, odors, circulation, and safety. These limitations ensure that cannabis activities are compatible with surrounding land uses and do not interfere with non-industrial uses.

Comment Response O.3-7

This comment asserts that allowing cannabis manufacturing, including volatile extraction, in rural and high fire hazard areas would create significant and unmitigated safety risks. The Chapter 3.4, *Hazards and Hazardous Materials* of the Program EIR evaluates fire and hazardous materials risks associated with cannabis manufacturing and concludes that compliance with applicable fire codes, hazardous materials regulations, and licensing limits would reduce risks to less than significant levels.

The proposed Project does not approve specific locations for manufacturing facilities, and any future proposals would be subject to building permits and applicable safety standards. The EIR appropriately evaluates these risks at a programmatic level without assuming site-specific conditions. Please refer to Master Response 1 – Use of a Program EIR for a detailed discussion of the programmatic nature of the Project, the absence of site-specific project approvals, and the appropriate use of a Program EIR under CEQA.

Comment Response O.3-8

This comment asserts that the County's eligibility maps fail to identify a private school operated by Acton Faith Bible Church, potentially allowing incompatible cannabis uses nearby. The County appreciates the Acton Town Council's assistance in identifying instances where school facilities or school-related structures may not have been fully captured in the GIS datasets referenced in the Program EIR.

The County acknowledges that the initial eligibility maps are programmatic screening tools prepared using Countywide GIS layers that were available at the time and are not intended to serve as final determinations of site eligibility. These maps may contain data gaps or omissions due to limitations in source data, including the depiction of school facilities located partially or wholly within rights-of-way.

Under the proposed Project, any potentially eligible zoned parcel that overlaps with a required buffer (i.e., 600 feet from youth-oriented uses including public or private schools, child day care centers, public parks), would not be eligible for a commercial cannabis license. Prior to issuance of any cannabis license, as part of the licensing application review process, the County would ensure that applications are consistent with the proposed site eligibility and buffer requirements based on existing land uses at the time of application.

The public and private schools shown on the County's eligibility map are identified using publicly available data from the California Department of Education (CDE)². OCM staff conducted additional research to determine why Acton Faith Bible Church was not included on the map. Based on that review, OCM did not find CDE records identifying Acton Faith Bible Church as a public or private school. The County updated its youth-oriented use data in April 2026 and will continue to periodically update the eligibility map to help ensure it remains a useful resource for community members. For instance, the County plans to conduct regular updates of the eligibility maps following decision-maker hearings and approval of the proposed Project to address identified errors or omissions, incorporate updated GIS datasets, and depict licensed commercial cannabis sites that get approved under the Commercial Cannabis Business Licensing Program.

Comment Response O.3-9

This comment asserts that the Program EIR's assumptions regarding license caps are unsupported because those limits are not explicitly included in draft ordinance language. However, the license caps analyzed in the Program EIR are not intended to be established in Title 22. Title 22 establishes zoning, siting, and land use standards for where commercial cannabis businesses may be allowed. The number and type of commercial cannabis licenses would be established through the proposed amendments to Title 8 of the LACC, which will govern the Commercial Cannabis Business License Program.

As described in Section 2.3.3, *Project Overview*, the Program EIR's 90-license assumption is based on the commercial cannabis license framework approved for implementation by the Board of Supervisors through its February 15, 2022 motion.³ Under this framework, the proposed program would include up to 90 licenses: 25 retail storefront licenses, 25 delivery-only licenses, 10 manufacturing licenses, 10 distribution licenses, 10 cultivation licenses, and 10 testing licenses. Microbusinesses are not counted as a separate license type under this framework. Rather, a microbusiness is a designation for a business conducting three or more commercial cannabis activities at the same site. Each commercial cannabis activity conducted as part of a microbusiness would count against, or draw down from, the number of available licenses for that activity type. For example, if a microbusiness includes cultivation, manufacturing, and distribution, those activities would count against the available cultivation, manufacturing, and distribution license totals.

Supervisory District limits would apply to retail storefront and delivery-only licenses. No more than 5 retail storefront licenses and 5 delivery-only licenses would be allowed in each Supervisory District. Manufacturing, distribution, cultivation, and testing licenses would not be required to be evenly distributed across Supervisory Districts. Instead, these

² [California Department of Education Geo Hub](#)

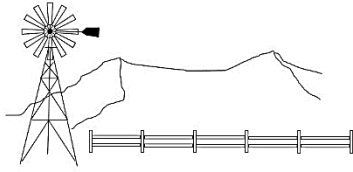
³ <https://file.lacounty.gov/SDSInter/bos/supdocs/166358.pdf>

businesses would be subject to other restrictions intended to limit overconcentration based on Planning Area.

The proposed Title 8 amendments are the appropriate mechanism for implementing the license caps and licensing procedures. The Title 8 and Title 22 ordinance amendments will be made available to the public before the applicable public hearings, consistent with standard County practices. The public, interested stakeholders, and decision makers will have the opportunity to review and comment on the proposed Title 8 amendments before the Board of Supervisors considers final action on the proposed program.

If the County should consider revisions to the proposed program to allow for issuance of an additional number of licenses, these changes may be subject to further environmental review as the environmental consequences of such actions have not been analyzed in this Program EIR. However, the County Board of Supervisors has made clear their intent to limit the number of licenses and distribution of licenses as described in Section 2.3.2, *Project Overview*. Please also refer to Master Response 3 – Description of Ordinance Amendments.

With this clarification, the absence of license caps from the draft Title 22 ordinance does not undermine the analysis of the Program EIR. The Program EIR properly analyzes the anticipated licensing framework, while the implementing license caps and procedures would be established through Title 8. The proposed amendments package to be submitted to the County decision-makers will include all mandatory elements of the program, including restrictions on the number of licenses to be issued and proposed geographic distribution requirements.



SAVE OUR RURAL TOWN

The Office of Cannabis Management
CannabisEIR@dcba.lacounty.gov

March 30, 2026

Subject: Save Our Rural Town Comments on the Draft Programmatic Environmental Impact Report for the Los Angeles County Cannabis Program.

To the Office of Cannabis Management Staff;

Save Our Rural Town (SORT) respectfully offers the following comments on the Draft Programmatic Environmental Impact Report (DPEIR) prepared for the County's proposed cannabis program. SORT has a number of concerns with the DPEIR and its associated ordinances; these concerns are set forth below.

MANY OF THE "MITIGATION MEASURES" HINGE ON ENFORCEMENT THAT IS NOT LIKELY TO OCCUR.

SORT is substantially concerned by the DPEIR's conclusion that, other than matters pertaining to transportation, the County's cannabis program has **no** potential to result in any significant environmental impacts. Even more concerning, the principal basis for this conclusion is that the County will enforce all applicable laws and standards and that is why impacts will all be less than significant. This is a startling conclusion, given that the County does not have a particularly good "track record" in enforcing existing codes and regulations in the rural areas of North Los Angeles County. Accordingly, the impacts that the DPEIR declares to be "less than significant" because cannabis businesses will comply with applicable regulations enforced by the County are in fact likely to be significant because the County is unlikely to enforce them.

O.4-1

SORT is particularly concerned with the mitigation measures pertaining to odor control from cannabis cultivation, manufacturing, storage, and other operations because they are all contingent on either the development of an odor control plan that will be implemented and enforced by the Health Department (for which enforcement is unlikely to occur) or the enforcement of nuisance odor rules promulgated by various air quality management districts over which the County has no control or oversight. AQMD nuisance odor regulations are cumbersome, require a large number of complaints, and take years to resolve. And, while the affected public waits for the Health Department and/or Air Quality Management District to bring a non-compliant cannabis operation into compliance with odor control requirements, significant odor impacts will occur. Therefore, the DPEIR is flat out wrong to conclude otherwise.

THE DPEIR DOES NOT PROPERLY ACCOUNT FOR PUBLIC SAFETY RISKS POSED BY THE CANNABIS PROGRAM.

SORT is troubled by the DPEIR conclusion that the cannabis program poses no public safety or emergency responses impacts because cannabis businesses will be housed in existing buildings that are served by existing police and fire services. This conclusion presupposes that all existing buildings are adequately served by existing police and fire services. While this may be true in urban and suburban areas, it is certainly not true in rural areas where there is no standing police presence and where fire departments are very small. This conclusion also presumes that a cannabis business which is newly installed in an existing building will have the same demand for police and fire protection as the business that previously occupied the space. Such a presumption is absurd. Cannabis operations are magnets for armed and violent criminals and they require substantially more police resources than a local tack store or a print shop. Similarly, cannabis manufacturing facilities that utilize volatile extraction operations which are prone to explosion and fire hazard severity zone require more fire protection resources than a storage building. The conclusion that the cannabis program does not pose any significant public safety impacts is unsupportable and lacks foundation.

O.4-2

CANNABIS CULTIVATION OPERATIONS HAVE THE POTENTIAL TO RESULT IN SIGNIFICANT WATER RESOURCE IMPACTS

Cannabis cultivation operations require a significant amount of water; this is a particular concern in rural areas of the high desert where water resources are stretched thin. For example, in the Community of Acton, a resident was told by the local waterworks district that he could not construct a riding arena because it would require substantial upgrades to the existing water infrastructure. Nonetheless, the DPEIR concludes that water resource impacts will be less than significant because cannabis businesses will only be permitted in existing buildings that have “existing infrastructure” and “municipal water service”. However, this presupposes that a proposed cannabis operation will have the same water demand as the business that previously occupied the space. This may be true for retail operations, but it is certainly not true for cultivation operations.

O.4-3

Additionally, the term “municipal water service” that is used in the DPEIR is vague and ill defined. In many rural areas, there are small mutual water companies and small public water systems that serve localized areas; SORT does not believe that such operations should be considered to satisfy the “municipal water service” threshold that the DPEIR appears to establish. Accordingly, DCBA must further define what is meant by “municipal water service”; perhaps a minimum number of service connections or storage capacity should be identified. This is particularly true for cultivation operations which are likely to overwhelm small municipal systems such as that in Acton.

THE CANNABIS PROGRAM DOES NOT MEET CRITICAL OBJECTIVES

SORT is concerned that the proposed cannabis program does not meet several of the critical objectives set forth in the DPEIR. For instance:

Page 2-25 of the DPEIR states that objectives of the cannabis project include the establishment of “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”. Presumably, such “land use requirements” are incorporated into the proposed revision to Title 22 because Title 22 is the County’s Zoning Ordinance adopted for the purpose of implementing County land use objectives. However, the proposed revision to Title 22 does not address the “land use requirements” listed on page 2-25. It does not require controls to minimize obnoxious odors. It does not include security measures to minimize criminal activities. It provides no measures to prevent degradation of neighborhood character. It certainly contains no provisions that address fire hazards; to the contrary, it actually authorizes explosion- and fire-prone volatile extraction operations in Very High Fire Hazard Areas! Nothing that the DPEIR states regarding land use objectives are secured by the proposed Title 22 revision, so it is not clear how the cannabis project actually meets this project objective.

O.4-4

Pages 2-25- 2-26 of the DPEIR also states that an objective of the cannabis project is to 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”. However, there is no evidence of any such “regulatory program” that provides “effective enforcement controls” in either the DPEIR or the proposed Title 22 revision. In fact, page 2-13 of the DPEIR indicates that enforcement by the County will be an entirely optional activity which may (or may not) occur. Certainly nothing in the proposed Title 22 revision establishes a framework that “ensures adequate law enforcement or fire protection services”. To the contrary, the proposed Title 22 revision authorizes all types of cannabis businesses in rural residential areas that have no standing law enforcement presence and minimal fire response facilities. It also incorporates no provisions that address neighborhood character or minimize negative effects of odor, or criminal activity. There is simply no evidence that the cannabis project actually achieves this project objective.

Pages 2-26 of the DPEIR also states that an objective of the cannabis project is to “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”. However, the proposed cannabis project does not “limit potential for adverse impacts” by ensuring “compatibility of commercial cannabis activities” in “residential neighborhoods”. To the contrary, the cannabis project provides *no* compatibility assurances to many established residential neighborhoods because it authorizes all cannabis operations right in their midst and without imposing any odor control requirements or establishing minimum sheriff responses or fire protection standards or security standards to minimize the effects of criminal activities. This fact demonstrates that the cannabis project does not achieve this project objective.

O.4-4
cont.

THE CANNABIS PROGRAM WILL RESULT IN SUBSTANTIAL IMPACTS ON RESIDENTIAL USES

Because the County’s cannabis program does not establish any buffers for sensitive residential uses, such uses will experience substantial adverse odor and public safety impacts. This is particularly true in rural areas where industrially zoned properties are imbedded in residential neighborhoods.

O.4-5

CONCLUSION

SORT respectfully requests that the County factor the above information into any and all future decisions that are made regarding the cannabis program.

Regards;

/S/ Jacqueline Ayer

Jacqueline Ayer, Director

Save Our Rural Town

Comment Letter O.4 – [Jacqueline Ayer, Save Our Rural Town]***Comment Response O.4-1***

This comment asserts that many mitigation measures in the Program EIR improperly rely on enforcement of County and State regulations that the commenter believes are unlikely to occur, particularly in rural areas, and therefore concludes that impacts characterized as less than significant would in fact be significant. As thoroughly discussed in Chapter 2, *Project Description* and throughout the Program EIR, the proposed Project would establish a regulated licensing framework for commercial cannabis businesses. Licensed businesses would be subject to State law, LACC requirements, permit conditions, license conditions, inspections, complaint investigations, and enforcement remedies.

With respect to odor, the County clarifies that odor control would not rely solely on air district nuisance enforcement. Chapter 11.37 of the LACC, administered by the Los Angeles County Department of Public Health, Environmental Health Division, requires commercial cannabis retail, distribution, manufacturing, and cultivation businesses to obtain a Public Health Permit. Among other requirements, applicants and licensees must submit an odor management plan describing the measures that will be used to prevent odors from being detected outside the facility or indoor cultivation site.

Operators are responsible for implementing the odor management plan, maintaining records related to odor control, including system malfunctions and complaints, and making modifications to the odor management plan when required following an inspection. If modifications are made that may affect odor control, an updated odor management plan must be submitted to Environmental Health Division within 30 days.

Please refer to Master Response 4 – Public Safety, Code Enforcement, and Crime for further information on how the County would enforce compliance by licensed businesses.

Comment Response O.4-2

This comment contends that cannabis businesses would create significant public safety and emergency response impacts in rural communities due to increased criminal activity, armed security, and higher fire risks not adequately addressed in the Draft Program EIR. Please refer to Master Response 4 – Public Safety, Code Enforcement, and Crime.

Comment Response O.4-3

This comment asserts that cannabis cultivation could significantly strain water resources in rural areas and requests clarification of the term “municipal water service,” particularly with respect to small or mutual water systems. However, for a site to be eligible for cannabis, it must be located on an eligibly zoned parcel and restricted to developed lots that have existing 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 and fire) currently serving the site. An applicant that cannot demonstrate adequacy of public infrastructure, utility service, and public services

would not be eligible for a license. Potentially eligibly zoned sites in the community of Acton and other rural communities may not be able to demonstrate such services exist to serve the proposed cannabis business, therefore making rural sites ineligible.

Further, impacts to water supply and utility systems from potential future cannabis operations, including indoor cannabis cultivation, are discussed in detail in Section 3.7, *Utilities/Service Systems*. As described therein, “[p]ursuant to the State Water Resources Control Board (SWRCB) 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.” Under this policy, a municipal or permitted water supply is defined under Water Code Section 13575(b)(6) as a “[r]etail water supplier”, which means any local entity, including a public agency, city, county, or private water company that provides retail water service. The proposed Project would not approve any specific cannabis cultivation operation, nor does it authorize expansions of water system capacity. Any future cultivation proposal would be reviewed by the applicable water purveyor to ensure adequate supply is available without adverse effects on existing users.

Comment Response O.4-4

This comment claims that the proposed cannabis program fails to meet several Project Objectives described in the Program EIR, including minimizing adverse impacts, ensuring compatibility with residential neighborhoods, and protecting public health and safety. Project objectives described in the Program EIR articulate the policy goals guiding development of the cannabis program and do not function as enforceable development standards. As presented in the IS and Program EIR, the proposed Project includes specific restrictions and regulatory requirements that would avoid or minimize environmental impacts. With the exception of transportation-related VMT, all potential impacts were determined to be less than significant with implementation of the proposed Project. This outcome is due to the reliance on existing regulations and permitting requirements, as well as the proposed Title 8 and Title 22 amendments, which are designed to limit the scale and location of cannabis uses and reduce the potential for physical environmental effects.

For a discussion on how the County would ensure compliance of licenses businesses and support enforcement against unlicensed operators, please refer to Master Response 4 – Public Safety, Code Enforcement, and Crime.

In addition, to address risks associated with fire, cannabis cultivation and manufacturing businesses would be subject to LACoFD Regulation #30, which establishes requirements for cannabis cultivation and manufacturing. Regulation #30 requires businesses to submit detailed plans to the LACoFD’s Special Occupancy Inspection Unit for review; prohibits cannabis cultivation and manufacturing in certain building occupancy types; requires operational permits for plant extraction and CO₂ enrichment systems; and requires technical reports, site inspections, ventilation systems, gas detection systems, emergency shut-off procedures, and analysis of extraction systems. Additional operational permits may

also be required for gases, flammable liquids, hazardous materials, and any applicable Certified Unified Program Agency permits. If an applicant cannot demonstrate consistency with all applicable requirements and provisions, the application cannot be approved, and the business cannot be permitted and licensed by the County, DCC, and other responsible agencies with permitting authority over proposed commercial cannabis businesses.

Please refer to Comment Response O.4-1, O.4-2, and O.4-3 above for further discussion of mandatory requirements and regulations of the proposed Project for reducing or avoiding impacts associated with odors, public safety, and water supplies.

The Program EIR's conclusion regarding impact minimization is therefore not dependent on speculative enforcement, but on the mandatory implementation of these regulatory requirements as a condition of approval. For example, as discussed in Chapter 2, *Project Description*, commercial cannabis businesses licensed under the proposed Project would be subject to various regulations governing site eligibility, including requirements that cannabis operations be limited to existing, legally constructed, permitted, and permanent structures. This requirement substantially avoids potential physical environmental effects by precluding new ground disturbance, grading, or construction activities that could otherwise impact biological resources, cultural resources, hydrology, and other environmental resource areas. Please also refer to Master Response 2 – New Development for detailed response to concerns regarding potential for new development under the proposed Project.

Comment Response O.4-5

This comment asserts that the absence of buffers from residential uses would result in substantial odor, safety, and compatibility impacts, particularly in rural communities. The Program EIR evaluates land use compatibility and potential effects on surrounding uses within the context of proposed site eligibility, proposed land use buffer requirements, compatibility of proposed cannabis uses with applicable zoning regulations, and required compliance with proposed and existing County and state regulations adopted for the purposes of reducing impacts on public health, safety, neighborhood compatibility, and environmental resources. For detailed response to concerns regarding odor and public safety impacts, please refer to Comment Response O.4-1 and O.4-2 above.



March 30, 2026

Los Angeles County Department of Consumer and Business Affairs
Office of Cannabis Management
Attention: Fernando Neito, Senior Analyst
320 W. Temple Street, Room G-10
Los Angeles, CA 90012

RE: Public Comment on Cannabis Draft Program Environmental Impact Report

Dear Mr. Neito,

United Homeowners 'Association II (UHA) appreciates the opportunity to comment on, and agrees with, the concern voiced in the Draft Environmental Impact Report (Draft EIR) about the potential for increased traffic on the Slauson Corridor, from Angeles Vista Blvd and Slauson Ave on the East to Buckingham Park Way and Slauson Ave. on the West also of some concern are the newly defined commercial areas on Victoria Ave and 54th Street in View Park-Windsor Hills. The UHA previously stated our concerns regarding increased traffic in our response to the Cannabis Ordinance (CO) and that same concern is reiterated by UHA here.

The Ladera Heights, View Park-Windsor Hills communities will be impacted by increased traffic due to cannabis shops that will be housed in our community. The CO stated that 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 Vehicle Miles Traveled.

The Draft EIR concedes that the impacts of traffic congestion are potentially significant, however, the mitigation measures recommended by the Draft EIR are not comprehensive and the UHA questions if the suggested mitigation measures will be effective. In fact, the mitigation measures documented in the Draft EIR are nonexistent for the large number of customer vehicles that will frequent the cannabis shops, but are specific to the small number of cannabis shops employees. The Draft EIR recommends: transit passes, ride sharing and carpooling for employees of the shops but conveniently and purposely does

not speak to the much larger problem of increased traffic congestion caused by customers driving their cars to the cannabis shops.

The CO identifies commercial and mixed-use areas in the Ladera Heights, View Park-Windsor Hills communities where cannabis shops can be located. However, the Draft EIR does not take into account the areas within these communities that have been newly upzoned as part of the Westside Area Plan (WASP) to incentivize increased housing and, along with it increased traffic congestion.

The UHA requests that as a condition of the approval of the Draft EIR, that Los Angeles County undertakes a comprehensive traffic congestion study to determine how much additional traffic will be experienced by the communities as a result of the approval of the WASP, in conjunction with the cannabis ordinance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Angela Sherick-Bright". The signature is fluid and cursive, with the first name "Angela" being more prominent.

Angela Sherick-Bright
Land Use Chairperson

O.5-1
Con.

Comment Letter O.5 – [Angela Sherick-Bright, United Homeowners Association III]

Comment Response O.5-1

This comment expresses concern that cannabis retail uses would increase traffic congestion along the Slauson Corridor and in the Ladera Heights and View Park-Windsor Hills communities, asserts that mitigation measures do not adequately address customer vehicle trips, and requests a comprehensive traffic congestion study that considers cumulative impacts from both the proposed Project and the Westside Area Plan.

With regard to comments requesting analysis of impacts relating to traffic congestion as a result of the proposed Project, Senate Bill (SB) 743 and updates to the CEQA Guidelines have revised the criteria for determining what constitutes a significant transportation-related environmental impact, shifting from traditional congestion and level of service (LOS) metric to VMT. Consistent with SB 743 and updates to the CEQA Guidelines, the County has established new transportation-based significance thresholds through the *Los Angeles County Transportation Impact Analysis (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). Consistent with these guidelines, the analysis of transportation-based impacts presented in this Program EIR utilizes VMT-based metrics, rather than impacts on congestion and LOS.

Regarding the commenter's request for a comprehensive corridor-level traffic congestion study that analyzes the combined effects of implementation of the proposed program and the Westside Area Plan, such an analysis is not warranted under CEQA for this Program EIR. As discussed in Master Response 1 – Use of a Program EIR above, the Program EIR does not evaluate impacts at the site-specific level, and corridor or location-specific analysis of transportation impacts is not feasible at this time. However, under the Westside Area Plan, some Commercial zones have been changed to Mixed-Use zones. Although the proposed Project would allow storefront cannabis retail and delivery businesses in Commercial zones and in Commercial-only Mixed-Use zones, the proposed Project would prohibit cannabis businesses from being located within the same structure or on the same parcel as any legally established dwelling. As a result, where residential use is introduced through implementation of the Westside Area Plan, those properties would no longer remain eligible for cannabis businesses. Accordingly, the overall effect of the Westside Area Plan would be to reduce, rather than expand, the number of parcels potentially eligible for cannabis businesses.

9.5.3 Individuals

From: [R.W](#)
To: [DCBA CannabisEIR](#)
Subject: Public Comment – Cannabis Licensing Program and Community Impact
Date: Monday, March 9, 2026 11:02:28 PM

CAUTION: External Email. Proceed Responsibly.

Good evening,

My name is Raneisha H, and I am a Los Angeles County resident, mother, and founder of Coalition of Parents Nationwide. And Advocate Mother Law student

I want to address a serious contradiction in Los Angeles County regarding cannabis policy and family court systems.

For nearly nine years, I was involved in dependency court proceedings concerning my children, identified here by initials as J.S. and J.H. During that time, I was repeatedly labeled as a drug abuser because of marijuana use, even though there was no medical diagnosis, no clinical evaluation, and no proof of substance abuse disorder.

Over the course of those years, I attempted to present evidence and documentation to defend myself, but on multiple occasions I was not allowed to fully present my evidence in court. These accusations remained in the record while my evidence was ignored.

Now Los Angeles County is preparing to license cannabis businesses and collect revenue from the same plant that families were punished over.

Cannabis is widely known to help people with pain, trauma, anxiety, and other health issues. Many people use it for relief when traditional medications fail.

If cannabis is legal, parents should not be labeled drug abusers without medical proof, and families should not be separated over it.

I also want to address licensing costs.

Communities that were historically targeted by drug enforcement should not be priced out of the legal cannabis industry.

Cannabis licenses should be free or extremely affordable, and if there is a fee it should be no more than \$20 maximum, with no junk fees, hidden costs, or excessive government charges. At all it should be around the world.

The County has already collected enough taxes.

Any revenue generated should go toward children and community support, including:

I.1-1

I.1-2

schools

youth programs

feeding the homeless

community health programs

Cannabis legalization should focus on healing communities and supporting families, not creating another system where government profits while communities struggle.

My own experience, which has been discussed publicly in articles about my children being taken and my fight to reunify my family, shows how deeply these policies can impact families.

Los Angeles County must ensure cannabis policy includes:

fairness

family protections

affordable access

and reinvestment into communities

Thank you.

Raneisha Hubbert
Los Angeles County Resident
Founder, Coalition of Parents Nationwide

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1.1-2
Con.

Comment Letter I.1 – [Raneisha Hubbert]

Comment Response I.1-1

This comment expresses support for the legalization of cannabis use. While this comment is unrelated to the environmental analysis presented in this Program EIR it will nevertheless be forwarded to the County's decision makers for their consideration.

Comment Response I.1-2

This comment expresses concerns regarding the potential cost of licensing fees and the allocation of local agency tax revenues from licensed cannabis businesses. While this comment is unrelated to the environmental analysis presented in this Program EIR it will nevertheless be forwarded to the County's decision makers for their consideration.

From: [Freedas Mom](#)
To: [DCBA CannabisEIR](#)
Subject: Anonymous Public Comment, from Sawtelle Area WLA resident. Re: Join the Office of Cannabis Management for an Online Public Meeting Wed., March 11
Date: Wednesday, March 11, 2026 10:21:38 AM

CAUTION: External Email. Proceed Responsibly.

Anonymous Public Comment, from Sawtelle Area West LA resident.

The county is very motivated to cash in on the sale of cannabis but the cost is too high.

Los Angeles is not enforcing important health and safety laws regarding cannabis. Until it does, the number of cannabis businesses should not increase.

I live next to Stoner Park, where you will see people (under age and adults) publically smoking and vaping at the park, on sidewalks, at bus stops, in their cars, and in shared outdoor spaces in apartment properties. People of all ages are adversely affected, including children. The kids that go to the skate park, playground, basketball courts and tennis courts are surrounded by under age and adult cannabis smokers.

Weed isn't the herb it used to be. It's genetically modified to be much stronger, and it was never harmless to everyone. The advertising for pot makes it sound harmless.

People should not be exposed to secondhand smoke or vape in public places or in shared spaces where they live.

Something has to be done to stop people from driving while high.

With legalization, there has been a massive increase in cannabis consumption.

Until these problems are solved I will always passionately oppose dispensaries.

I.2-1

Comment Letter I.2 – [Anonymous]

Comment Response I.2-1

This comment expresses general opposition to the proposed Project and concerns over the effects of legal cannabis use and sales on public health and safety. While this comment is unrelated to the environmental analysis presented in this Program EIR it will nevertheless be forwarded to the County's decision makers for their consideration.

From: [Priya Gehm](#)
To: [DCBA CannabisEIR](#); [Office of Cannabis Management](#)
Subject: Re: Automatic reply: Anonymous Public Comment, from Sawtelle Area WLA resident. Re: Join the Office of Cannabis Management for an Online Public Meeting Wed., March 11
Date: Thursday, March 12, 2026 7:31:09 AM

CAUTION: External Email. Proceed Responsibly.

I sent a general public comment because I was never able to find the Draft Program Environmental Impact Report (PEIR). I realize it's too late to comment on the report, but I would like to read it. Please send it as an attachment or send a direct link.

I.3-1

On Wed, Mar 11, 2026 at 10:21 AM DCBA CannabisEIR
<CannabisEIR@dcba.lacounty.gov> wrote:

Thank you for submitting your comments to the County of Los Angeles Office of Cannabis Management regarding the Draft Program Environmental Impact Report (PEIR). We appreciate your input concerning the potential environmental impacts of the proposed Commercial Cannabis Business Licensing Program.

If you did not intend to submit a public comment regarding the Draft PEIR, please contact the Office of Cannabis Management at cannabis@lacounty.gov.

Next Steps

- Your comments will be reviewed as part of the Draft PEIR evaluation process.
- We encourage you to stay informed about updates to the Commercial Cannabis Business Licensing Program.
- If additional information or follow-up is needed, we may contact you at the email address you provided.

Thank you again for your participation and contribution to this important community process.

Office of Cannabis Management
Department of Consumer and Business Affairs
320 W. Temple St., Room G-10
Los Angeles, CA 90012
Email: cannabis@lacounty.gov
Website: cannabis.lacounty.gov

Comment Letter I.3 – [Priya Gehm]

Comment Response I.3-1

A copy of the Draft Program EIR was provided in response as requested. The Draft Program EIR has also been made available for review on OCM's website at: <https://dcba.lacounty.gov/cannabis/publiccomment/>.

From: [Candice Hill](#)
To: [DCBA CannabisEIR](#)
Subject: Public Comment
Date: Thursday, March 26, 2026 9:26:37 AM

CAUTION: External Email. Proceed Responsibly.

We do not need more cannabis in Los Angeles. Or any other place. The reason that I voted to legalize cannabis was to keep people from being arrested for cannabis possession. Having that arrest on record prevents job attainment for people with a cannabis conviction, which is unfair. There are some people who were allowed rehab while others were jailed. That is why I voted for cannabis legalization.

I did not vote for loopholes that allowed cannabis shops to pop up all over the state of California.

Water and soil are precious resources.

We don't need to use them up growing cannabis.

Sincerely,
Candice Hill

I.4-1

Comment Letter I.4 – [Candice Hill]

Comment Response I.4-1

This comment expresses general opposition to the proposed Project. While this comment is unrelated to the environmental analysis presented in this Program EIR it will nevertheless be forwarded to the County's decision makers for their consideration.

9.5.4 Verbal Comments

Verbal Comments V.1 — [Miriël Bereal]

1. Cannabis business owner. Restated that retail dispensaries must be in existing buildings. In Altadena, commercial space burned down — are there special provisions for that area since no structures exist?
2. It would be costly to construct a new building without already having a license. Are there special considerations for that?

Comment Response V.1-1

The same rules allowing cannabis businesses only in existing, legally constructed, permitted, and permanent structures in conformance with the LACC would apply. If a structure meeting these requirements previously existed at the site but was demolished or destroyed, reconstruction must occur separate and prior to the cannabis permit process.

Comment Response V.1-2

Construction of any facility must occur through the regular construction process, separate from and prior to applying for a commercial cannabis license. Under the proposed regulations, the County would not accept applications for a commercial cannabis business on undeveloped land or in nonconforming structures.

Verbal Comments V.2 — [Avis Bulbulyan]

1. Asked what defines a responsible owner for background checks, what disqualifies them, and whether criminal history is considered.
2. Asked when the application process begins.

Comment Response V.2-1

Under the proposed Title 8 regulations, background checks would evaluate criminal history. This comment does not raise an environmental issue regarding the adequacy of the Draft Program EIR. More details on the proposed application process will be provided prior to County decision-maker hearings.

Comment Response V.2-2

This comment does not raise an environmental issue regarding the adequacy of the Draft Program EIR. More details on the proposed application process and timeline will be provided prior to County decision-maker hearings.

Verbal Comments V.3 — [Jacqueline Ayer]

1. Acton has 80 acres of M1 land, more than other districts. Concerned about overconcentration in District 5.

2. Wants Objective 4 changed from “encourage” to “require” legal operation to promote enforcement.
3. Concerned that microbusinesses have no numerical limit and could be large.

Comment Response V.3-1

The proposed framework includes several safeguards to limit potential overconcentration, including a cap of five storefront retail and five non-storefront/delivery businesses per Supervisorial District, Planning Area limits for both retail and non-retail commercial cannabis businesses, required buffers from youth-oriented uses and substance abuse and recovery facilities, and separation requirements between cannabis retailers. These standards are intended to reduce clustering and help ensure commercial cannabis businesses are distributed in a controlled and limited manner.

Comment Response V.3-2

Project objectives in the Program EIR describe the policy goals guiding the proposed program and do not function as enforceable development standards. Objective 4 appropriately reflects the Project’s goal of bringing commercial cannabis activity into a regulated local framework to maximize licensed activity and reduce unlicensed activity. The proposed Project includes separate licensing, operational, and compliance requirements to ensure licensed cannabis businesses operate in accordance with County and State regulations. Locally, OCM would regulate licensed cannabis businesses under the proposed framework, while enforcement against illicit businesses would continue through the County’s existing enforcement authorities (e.g., Sheriff, District Attorney, County Counsel) and processes. No revision to Objective 4 is required.

Comment Response V.3-3

There would not be a limit to the number of cannabis microbusiness designations that would be allowed in the unincorporated areas of the County. However, each of the proposed cannabis activities comprising the microbusiness would require its own license, which would draw from the remaining available licenses for each business type.

Verbal Comments V.4 — [Avis Bulbulyan]

1. Asked whether applicants can expand, remodel, or add square footage to existing buildings.
2. Commented that retail is likely the only license type applicants will pursue; unlikely that cultivation or manufacturing will occur in Acton.

Comment Response V.4-1

The proposed Project would authorize the County to allow cannabis businesses only in existing, legally constructed, permitted, and permanent structures in conformance with the LACC. 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.

Comment Response V.4-2

These comments will be forwarded to the County's decision makers for their consideration.

Verbal Comments V.5 — [Jacqueline Ayer]

1. Concerned that County may allow new construction for non-cannabis uses that later convert to cannabis.
2. Recommends allowing reconstruction in Altadena but not allowing cannabis there.

Comment Response V.5-1

The proposed Project would not preclude new construction for non-cannabis uses that may otherwise be allowed under applicable zoning, building, and permitting requirements. However, the construction of a building for a non-cannabis use would not guarantee, reserve, or create any future entitlement to operate a commercial cannabis business at that location.

The County would make only a limited number of commercial cannabis licenses available for each license type, and issuance of a County commercial cannabis license would be contingent on the applicant obtaining all applicable State and local permits, approvals, and clearances. Any future proposal to convert an existing or previously constructed building to a commercial cannabis use would need to satisfy the County's cannabis zoning, licensing, and operational requirements, as well as any applicable State requirements.

Prospective applicants would assume any risks associated with constructing a building, changing a building's use, and securing the necessary approvals to qualify for a County commercial cannabis license. The County would not approve a commercial cannabis license unless the proposed site and operation comply with the applicable cannabis program requirements and remain within the scope of the Project analyzed in the Program EIR.

Comment Response V.5-2

Construction of any facility must occur through the regular construction process, separate from and prior to the permit process for commercial cannabis activities. Under the proposed regulations, the County would not accept applications for a commercial cannabis business on undeveloped land or in nonconforming structures.

Verbal Comments V.6 — [Miriël Bereal]

1. Asked whether 90 licenses total are planned and whether any are reserved for equity applicants.

Comment Response V.6-1

The County Board of Supervisors has established initial limits on the number of cannabis business licenses available for each cannabis business type, as detailed in Section 2.3.3., *Proposed Allowable Cannabis Business Types*. More details on the proposed social equity program will be provided prior to County decision-maker hearings.

Verbal Comments V.7 — [Gregory Taylor]

1. Asked whether regulations include hemp-based CBD and non-THC cannabinoids.

Comment Response V.7-1

The proposed program focuses on commercial cannabis businesses involving production, manufacturing, distribution, testing, and sale of THC products. Industrial Hemp and Hemp-based products are regulated at the State and Federal level.

Verbal Comments V.8 — [Dominic Melendez]

1. Asked when applications will open.

Comment Response V.8-1

Timing for implementation of the proposed program and the start of application processes would depend on timing of adoption of the proposed Project. Based on current schedule, launch of the application process is anticipated for 2027.

Verbal Comments V.9 — [Blue English]

1. Asked when equity program information will be available.

Comment Response V.9-1

Timing for implementation of the proposed program including elements of the social equity program would depend on timing of adoption of the proposed Project. Based on current schedule, launch of the social equity program is anticipated for 2027.

Verbal Comments V.10 — [Jacqueline Ayer]

1. Concerned about water supply requirements — municipal vs. private water companies. Asked whether cannabis businesses must be on municipal water.

Comment Response V.10-1

As described in Section 3.7, *Utilities/Service Systems*, 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.

Verbal Comments V.11 — [Miriël Bereal]

1. Stated that 90 licenses is too few for the size of the unincorporated area; wants to know if there's potential to increase the number of licenses.
2. Wants equity initiatives sooner.

Comment Response V.11-1

The County Board of Supervisors has established initial limits on the number of cannabis business licenses available for each cannabis business type, as detailed in Section 2.3.3., *Proposed Allowable Cannabis Business Types*. The number of available cannabis business licenses could change at the discretion of the County Board of Supervisors.

Comment Response V.11-2

The County recognizes the importance of providing equity-related support as early as possible and has already begun offering educational opportunities before commercial cannabis licenses are made available. These efforts include the Cannabis Social Equity Entrepreneurship Academy, a no-cost education and readiness program focused on cannabis retail entrepreneurship and key business considerations, as well as community workshops designed to help prospective applicants, workers, community members, and others make informed decisions about whether and how to participate in the future regulated cannabis program. Visit cannabis.lacounty.gov to learn more.

Verbal Comments V.12 — [Blue English]

1. Asked whether the meeting would be available as a replay or transcript.

Comment Response V.12-1

The meeting was recorded and made available for viewing at: [OCM Workshops, Webinars, and Trainings – Consumer & Business](#).

Verbal Comments V.13 — [Jacqueline Ayer]

1. Restated that existing eligible structures should be required to have municipal water already, as developing new water infrastructure would count as construction. An exception could be made for Altadena to replace destroyed infrastructure.
2. Concerned about armed guards near residential areas. Noted that residential areas are not categorized as sensitive uses.
3. Believes odor impacts would be significant without mitigation.

Comment Response V.13-1

As described in Section 3.7, *Utilities/Service Systems*, 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. Any development or redevelopment associated with a potential cannabis business, or upgrades to establish municipal water service to the site, would be subject to: (1) separate permitting and approval processes required under the 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.

Comment Response V.13-2

The proposed framework would not require cannabis businesses to use armed guards; that decision would be made by the individual business, subject to applicable laws and regulations. In addition, licensed cannabis businesses would be subject to state and local security requirements, including restricted access, surveillance, inspections, and enforcement provisions. Cannabis businesses would not be permitted on residentially zoned parcels and would only be allowed in existing, legally constructed, permitted, and permanent structures in eligible zones, subject to operational requirements and applicable buffers.

Comment Response V.13-3

Odor impacts are addressed in Section 3.1, *Air Quality* under Impact AQ-3. As described therein, 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 Department of Public Health'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.

Applicable air quality regulations enforced by the South Coast Air Quality Management District (SCAQMD) and Antelope Valley Air Quality Management District (AVAQMD) regulate nuisance emissions, odors, volatile organic compounds (VOCs), and other air contaminants. These agencies also maintain complaint investigation and enforcement programs and may require corrective action when a business causes nuisance or harmful emissions. Compliance with these existing regulations would help ensure that related air quality and odor impacts remain less than significant.

Verbal Comments V.14 — [Jacqueline Ayer]

1. Concerned that odor and firearm issues raised during scoping were not addressed in the Draft EIR.
2. Asked whether the Department of Public Health will enforce odor control. Concerned that existing enforcement is not strong enough.

Comment Response V.14-1

Impacts to public services, including impacts associated with public safety, were analyzed in Section XV, *Public Services*, of the IS (Appendix A). As described therein, while some crime associated with permitted cannabis commercial and industrial activities would likely continue, a net increase in cannabis-related crime is not anticipated. Please refer to Master Response 4 – Public Safety, Code Enforcement, and Crime.

Comment Response V.14-2

As described in Section 3.1, *Air Quality*, 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 Department of Public Health'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.

Verbal Comments V.15 — [Miriell Bereal]

1. Asked whether County can rezone Lake Avenue for manufacturing, retail, and distribution.
2. Asked whether manufacturing could occur in retail-only zones.
3. Asked how microbusinesses and multiple-use operations would be categorized.
4. Asked how licenses will be issued (lottery, merit, first-come).

Comment Response V.15-1

This comment does not raise an environmental issue regarding the adequacy of the Draft Program EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Comment Response V.15-2

A discussion of the proposed eligible zone districts for commercial cannabis manufacturing uses is presented in Section 2.3.4, *Proposed Areas Eligible for Commercial Cannabis Licenses*. Eligible zone districts for volatile manufacturing include Light Manufacturing (M-1), Restricted Heavy Manufacturing (M-1.5), and Heavy Manufacturing (M-2) zones. Eligible zone districts for non-volatile manufacturing include General Commercial (C-3), Commercial Manufacturing (C-M), Light Manufacturing (M-1), Restricted Heavy Manufacturing (M-1.5), and Heavy Manufacturing (M-2) zones.

Comment Response V.15-3

Discussion of the proposed licensing regulations and proposed eligibility areas for microbusinesses is provided in Section 2.3.3, *Proposed Allowable Cannabis Business Types* and Section 2.3.4, *Proposed Areas Eligible for Cannabis Business Licensing*, respectively.

Eligible microbusinesses must comply with zoning and all other applicable requirements for each activity.

Comment Response V.15-4

This comment does not raise an environmental issue regarding the adequacy of the Draft Program EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

Verbal Comments V.16 — [Jacqueline Ayer]

1. Asked whether buildings must exist before ordinance adoption. Concerned that developers could build for one use and later convert to cannabis without community input.

Comment Response V.16-1

The proposed Project would authorize the County to allow cannabis businesses only in existing, legally constructed, permitted, and permanent structures in conformance with the LACC. 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.

Verbal Comments V.17 — [Miri Bereal]

1. Asked whether cargo containers count as structures.

Comment Response V.17-1

The proposed Project would authorize the County to allow cannabis businesses only in existing, legally constructed, permitted, and permanent structure in conformance with the LACC.

Verbal Comments V.18 — [Sidney Mathalon]

1. Asked whether an LA City license can be transferred to LA County.

Comment Response V.18-1

No, all applications for a license under the proposed Project would be required go through the County licensing process.

Verbal Comments V.19 — [Jacqueline Ayer]

1. Asked whether nearby city cannabis businesses will be considered.
2. Asked whether operators must be local or if absentee owners are allowed.

Comment Response V.19-1

The proposed program would apply only to commercial cannabis businesses located in the unincorporated areas of the County. The proposed 500-foot buffer between licensed cannabis storefront retailers would account for existing storefront retailers in neighboring cities, not only those located in unincorporated areas. However, because this is a County requirement, storefront retailers in other jurisdictions may not be subject to the same buffer standard.

Comment Response V.19-2

This comment does not raise an environmental issue regarding the adequacy of the Draft Program EIR. The comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

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10.0 MITIGATION MONITORING AND REPORTING PROGRAM

10.1 PURPOSE

The following Mitigation Monitoring and Reporting Program (MMRP) provides a summary of each Mitigation Measure (MM) for the Commercial Cannabis Business Licensing Program (Program or Project) and the monitoring implementation responsibility for each measure. The MMRP for the proposed Project will be in place through all phases of the proposed Project.

10.2 RESPONSIBILITIES

The California Environmental Quality Act (CEQA) requires the adoption of feasible mitigation measures to reduce the severity and magnitude of potentially significant environmental impacts associated with Project development.

CEQA Guidelines Section 15091(d) states:

“When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be enforceable through permit conditions, agreements, or other measures.”

The Final Program Environmental Impact Report (EIR) for the proposed Project includes mitigation measures to reduce the potential environmental effects associated with the implementation of the Project. Following the County's certification of the Final Program EIR and approval of the CEQA Findings, including this MMRP, the approved Project would be monitored in the manner specified by this MMRP.

10.3 MONITORING TABLE

For each mitigation measure, Table 10-1 identifies: 1) the full text of the mitigation measure; 2) the plan requirements and timing, including the agency which oversees the action; and 3) the monitoring division, including the entity responsible for monitoring the action and verifying compliance.

Table 10-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Plan Requirements and Timing	Monitoring Division
Transportation		
MM TR-1. Transportation Demand Management Strategies. The County will require transportation demand management (TDM) strategies on a project-by-project basis to mitigate impacts to the maximum extent practicable. Recommended TDM measures from the County's Traffic Impact Analysis (TIA) Guidelines that may be applicable to commercial cannabis businesses include: <i>Commuter Trip Reduction (CTR) Programs with Required Monitoring</i> This measure would implement a mandatory CTR program with employers. CTR programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing vehicle miles traveled (VMT). <i>Ride Sharing Programs</i> 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. <i>Subsidized or Discounted Transit Programs</i> 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.	Site-based TDM strategies shall be prepared by the applicant and submitted as part of project application materials. County Office of Cannabis Management (OCM) and Department of Public Works Transportation Division shall review and confirm that all feasible site-based TDM measures are reflected in project plans and permit requirements. The applicant shall estimate the effectiveness of the site-based TDM measures in reducing project VMT.	County OCM shall ensure that the site-based TDM strategies are included as part of the project application and that all required measures are reflected in the project plans. The applicant shall demonstrate to County OCM and Public Works Traffic Safety and Mobility Division compliance monitoring staff that all required TDM measures are implemented.

- *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.

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