CEQA FINDINGS OF FACT AND
STATEMENT OF OVERRIDING CONSIDERATIONS
REGARDING THE
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES COUNTY COMMERICAL CANNABIS
BUSINESS LICENSING PROGRAM
STATE CLEARINGHOUSE NO. 2025030223

I. INTRODUCTION

The California Environmental Quality Act (CEQA) requires that written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to CEQA Guidelines Sections 15091 and 15093 Public Resources Code Section 21081. This document provides the findings required by CEQA. The potential environmental effects of the proposed Los Angeles County Commercial Cannabis Business Licensing Program (proposed Project) have been analyzed in a Draft Program Environmental Impact Report (Program EIR) (State Clearinghouse [SCH] No. 2025030223), dated February 2026. A Final Program EIR, dated June 2026, has been prepared that contains comments received on the Draft Program EIR, responses to the individual comments, revisions to the Draft Program EIR including any clarifications based on the comments and the responses to the comments, and the Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project. This document provides the findings required by CEQA for approval of the proposed Project.

A. Statutory Requirements for Findings

CEQA (Public Resources Code Sections 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Sections 15000 et seq.) promulgated thereunder, require the environmental impacts of a project be examined before a project is approved. Specifically, regarding findings, CEQA Guidelines Section 15091 provides:

> (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
>
> 1. 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 final EIR.
>
> 2. 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.

3. 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.

(b) The findings required by subsection (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) 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 fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The "changes or alterations" referred to in CEQA Guidelines Section 15091(a)(1) above, that are required in, or incorporated into, the project which mitigate or avoid the significant environmental effects of the project, may include a wide variety of measures or actions as set forth in CEQA Guidelines Section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments.

Regarding a Statement of Overriding Considerations, CEQA Guidelines Section 15093 provides:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or state-wide environmental benefits, of a proposal [sic] project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

B. Certification

Having received, reviewed, and considered the Final Program EIR for the proposed Project (SCH No. 2025030223), as well as other information in the record of proceedings on this matter, the County, as the Lead Agency, adopts and certifies the following Findings (Findings) and Statement of Overriding Considerations. The Findings and Statements of Overriding Considerations set forth the environmental and other bases for current and subsequent discretionary actions to be undertaken by the County and responsible agencies for the implementation of the proposed Project.

In addition, the County hereby makes findings pursuant to and in accordance with Public Resources Code Section 21081 and CEQA Guidelines Sections 15090 and 15091 and hereby certifies that:

(1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the final EIR.

(2) 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.

(3) 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.

C. Program Environmental Report and Discretionary Actions

The Final Program EIR addresses the direct, indirect, and cumulative environmental effects associated with adoption of the proposed Project. The Final Program EIR provides the environmental information necessary for the County to make a final decision on the requested discretionary actions. Discretionary actions to be considered by the County may include, but are not limited to, the following:

- Certification of the Los Angeles County Commercial Cannabis Business Licensing Program Environmental Impact Report (Environmental Assessment No. RPPL2024005648)

- Adoption of Zoning Ordinance Amendment No. RPPL2024001191
- Adoption of Project No. RPPL PRJ2024-000811

II. PROCEDURAL COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT

The County published a Draft Program EIR on February 12, 2026 and a Final Program EIR was completed in June 2026 in accordance with CEQA and the CEQA Guidelines. As authorized in CEQA Guidelines Section 15084(d)(2), the County retained a consultant to assist with the preparation of the environmental document. County staff from multiple departments, representing the Lead Agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The Program EIR reflects the County's independent analysis and judgement. The key milestones associated with the preparation of the Program EIR are summarized below. As presented below, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the Program EIR and to solicit comments on the results of the environmental analysis presented in the Draft Program EIR.

A. Environmental Review Process

In conformance with CEQA, the CEQA Guidelines, and the County CEQA Guidelines, the County conducted an extensive environmental review of the proposed Project.

- The County prepared an Initial Study (IS) that determined that a Program EIR would be required for the proposed Project. The County issued a Notice of Preparation (NOP) and Notice of Public Scoping Meeting along with the IS on March 5, 2025. The public review period extended from March 5, 2025, to April 4, 2025.
- The IS and NOP was published online on the County of Los Angeles Department of Consumer and Business Affairs (DCBA) Office of Cannabis Management's (OCM's) website, made available at eight library locations across the unincorporated County including Rowland Heights, Lennox, A C Bilbrew, South Whittier, Acton Agua Dulce, Topanga, East Los Angeles, and La Crescenta; circulated to relevant agencies, community organizations, and interested individuals; and distributed to more than 30,000 recipients on the project email contact list.
- The County conducted a virtual public scoping meeting (Zoom webinar) on March 19, 2025 at 6:00 pm. The meeting included a presentation with an overview of the proposed Project and the CEQA process. A total of 14 verbal public comments were received during the meeting. Appendix B, *Scoping Report* of the Program EIR describes the issues raised during scoping and where they are addressed in the Program EIR.
- A total of 40 written and verbal comments were received during the scoping period, which were considered during preparation of the Draft Program EIR.
- The scope of the Draft Program EIR was based in part on the findings of the IS, comments received in response to the IS and NOP, and comments received at the scoping meeting conducted by the County.
- The County prepared a Draft Program EIR and Notice of Availability (NOA), which were initially

made available for a 45-day public review period beginning February 12, 2026, and ending March 30, 2026. The NOA was noticed using the same distribution as the NOP, provided to commenters on the IS and NOP and subscribers to DCBA's news updates, and published in La Opinión and the Los Angeles Daily News.

- The County held a virtual community meeting on March 11, 2026, at 6:00 pm to summarize the findings of the Draft Program EIR and solicit input on the proposed Project from the community. Project. Approximately 47 members of the public attended the meeting, and 19 verbal public comments were received.

- A total of 12 comment letters were received during the public comment period as follows:
  - 3 letters from public agencies
  - 5 letters from organizations/groups
  - 4 letters from individuals in the community

- Following public review of the Draft Program EIR, the County prepared a Final Program EIR. The Final Program EIR/Response to Comments contains comments on the Draft Program EIR, responses to those comments, revisions to the Draft Program EIR, and appended documents.

B. Record of Proceedings

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed Project consists of the following documents and other evidence, at a minimum:

- The IS, NOP, and all other public notices issued by the County in conjunction with the proposed Project.

- All written and verbal comments submitted by agencies or members of the public during the public scoping period on the IS and NOP.

- All responses to comments submitted by agencies or members of the public during the public scoping period on the IS and NOP.

- The Draft Program EIR for the proposed Project.

- All written and verbal comments submitted by agencies or members of the public during the public review comment period on the Draft Program EIR.

- All responses to comments submitted by agencies or members of the public during the public review comment period on the Draft Program EIR.

- The Final Program EIR for the proposed Project.

- All written and verbal public testimony presented during a noticed public hearing for the proposed Project.

- The Mitigation Monitoring and Reporting Program (MMRP).
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft Program EIR and Final Program EIR.
- Proposed amendments to Title 8 of the Los Angeles County Code (LACC).
- Proposed amendments to Title 22 of the LACC
- The Resolutions adopted by the County in connection with the proposed Project, and all documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto.
- Matters of common knowledge to the County, including but not limited to federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings.
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

C. Custodian and Location of Records

The documents and other materials that constitute the administrative record for the County's actions related to the proposed Project are at DCBA's main office (320 W. Temple Street, Room G-10, Los Angeles, CA 90012). DCBA is the custodian of the administrative record for the proposed Project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the DCBA. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e).

D. Project Location

Los Angeles 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 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.

The General Plan identifies 11 planning areas.[1] 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.

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.[2] (See Table 2-1 of the Draft Program EIR for identified allowable cannabis types within each Supervisorial District.)

E. Project Objectives

The CEQA Guidelines require that the Program EIR project description include a statement of the Project Objectives. The primary Project Objectives are:

- 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;

- 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;

- 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;

- 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;

- 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;

- Minimize adverse effects of commercial cannabis activities on the natural environment, natural resources, and wildlife, including riparian corridors, wetlands, sensitive habitats, and water resources;

- Promote energy and resource efficiency in all cannabis activities, consistent with existing agricultural and other industry practices, standards, and regulations;

- 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;

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

[2] https://planning.lacounty.gov/unincorporated-los-angeles-county/.

- 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

- 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.

F. Project Description

The County is proposing a Commercial Cannabis Business Licensing Program for unincorporated areas of Los Angeles County to regulate, permit, license, and oversee cannabis businesses. The program would amend LACC Titles 8 and 22 to establish a comprehensive regulatory framework governing licensing, operating standards, zoning controls, and a Social Equity Program intended to support individuals disproportionately impacted by prior cannabis enforcement. 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 a social equity program to support and prioritize potential cannabis business owners that were adversely impacted by cannabis prohibition.

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 businesses would be allowed only within eligible zoning areas and existing legally permitted structures, subject to site plan review, buffer requirements, and operational standards. The program would prohibit non-compliant businesses, on-site consumption, co-location with residential uses, and certain advertising.

All businesses would be required to obtain County and state licenses, comply with annual renewal and ongoing compliance requirements, and be subject to inspections and enforcement actions for violations. The program would limit the number and geographic distribution of licenses through license caps and location restrictions, with potential expansion over time, and oversight provided by OCM in coordination with relevant County and State agencies.

III. CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS

CEQA Guidelines Section 15091 requires that a Lead Agency make a finding for each significant effect for the project. This section summarizes the significant environmental impacts of the proposed Project, describes how these impacts are to be mitigated, and discusses various alternatives to the proposed Project, which were developed in an effort to reduce the remaining significant environmental impacts. All impacts are considered potentially significant prior to mitigation or a project revision through the incorporation of a standard condition of approval unless otherwise stated in the findings.

The remainder of this CEQA Findings of Fact and Statement of Overriding Considerations is divided into the following sections:

Subsection A, Issues Deemed "No Impact" or "Less Than Significant Impact," presents topical areas that would result in no impact or less than significant impacts, as detailed in Chapter 5 of the Program EIR.

Subsection B, Impacts Mitigated to Less Than Significant, presents impacts that were determined to have a potentially significant impact that can be mitigated or avoided to less than significant.

Subsection C, Significant and Unavoidable Impacts that Cannot be Mitigated to Below the Level of Significance, presents impacts that were determined to have a potentially significant impact and that could not be mitigated below the level of significance, and the rationales for the findings.

Section IV, Alternatives to the Proposed Project, presents alternatives to the proposed Project, as detailed in Chapter 4 of the Program EIR, and evaluates them in relation to the findings set forth in CEQA Guidelines Section 15091(a)(3), which allows a public agency to approve a project that would result in one or more significant environmental effects if the project alternatives are found to be infeasible because of specific economic, social, or other considerations.

Section V, Statement of Overriding Considerations, presents a description of the proposed Project's one significant and unavoidable adverse impact and the justification for adopting a Statement of Overriding Considerations.

Based on the Program EIR discussion and analysis, the following is a summary of the environmental topics considered to have no impact, a less than significant impact, and a significant and unavoidable impact.

A. Issues Deemed to Have No Impact or Less than Significant Impact

No Impact

As described in the IS and Chapter 5 of the Program EIR, the County finds, based on substantial evidence in the record, that the proposed Project will have **no impacts** and require no mitigation measures with respect to the following issues:

- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources (IS Thresholds b, c, and d)
- Geology and Soils (IS Thresholds a.i, a.ii, a.iii, a.iv, c, and d)
- Hazards and Hazardous Materials (Program EIR Impact HAZ-5)
- Hydrology and Water Quality (IS Threshold e and Cumulative Impacts)
- Land Use and Planning (IS Threshold a)
- Mineral Resources
- Noise (IS Threshold b)
- Population and Housing (IS Threshold b)
- Recreation

Less Than Significant

This section identifies impacts of the proposed Project determined to be less than significant without implementation of project-specific mitigation measures. This determination, however, does assume compliance with Existing Regulations as detailed in the IS and Chapter 5 of the Program EIR. The County finds, based on substantial evidence in the record, that the proposed Project will have **less than significant impact** and require no mitigation measures with respect to the following issues:

- Aesthetics
- Air Quality
- Cultural Resources (IS Threshold a)
- Energy
- Geology and Soils (IS Thresholds b, e, and f)
- Greenhouse Gas Emissions

- Hazards and Hazardous Materials (Impacts HAZ-1, HAZ-2, HAZ-3, HAZ-4, HAZ-6, HAZ-7, and Cumulative Impacts)

- Hydrology and Water Quality (IS Thresholds a, b, c.i, c.ii, c.iii, c.iv, d, f, g, h, and Cumulative Impacts)

- Land Use and Planning (Impact LUP-1 and Cumulative Impacts)

- Noise (IS Thresholds a and c)

- Population and Housing (IS Threshold a)

- Public Services (IS Thresholds a, b, c, d, e, and f)

- Transportation (Impacts TR-1, TR-3, TR-4, and Cumulative Impacts)

- Tribal Cultural Resources (IS Threshold a and c)

- Utilities and Service Systems (Impacts UT-1, UT-2, UT-3, UT-4, UT-5, and Cumulative Impacts)

- Wildfire (IS Thresholds a, b, c, d, and e)

B. Impacts Mitigated to Less than Significant

The Program EIR did not identify any impacts that would be classified as less than significant with mitigation.

C. Significant and Unavoidable Impacts that Cannot be Mitigated to Below the Level of Significance

The following summary describes unavoidable adverse impacts of the proposed Project, even with the implementation of feasible mitigation measures, or where mitigation measures were found to be infeasible. The County finds, based on substantial evidence in the record, that the proposed Project will have **significant and unavoidable impacts** for the following issues:

- Transportation (Impact TR-2)

Findings Regarding Significant and Unavoidable Impacts

In accordance with Public Resources Code Section 21081 and CEQA Guidelines Section 15091, the County adopts one or more of the three possible findings for each significant impact. These findings are provided below and will be used hereinafter and referenced as identified below:

- **CEQA Finding 1.** Changes or alterations have been required in, or incorporated into, the proposed Project which avoid or substantially lessen the significant environmental effect as identified in the Program EIR (CEQA Guidelines Section 15091[a][1]).

- **CEQA Finding 2.** 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 (CEQA Guidelines Section 15091 [a][2]).

- **CEQA Finding 3.** 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 Program EIR (CEQA Guidelines Section 15091 [a][3]).

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. However, project modification or alternatives are not required where such changes are infeasible, as stated in CEQA Guidelines Section 15091(a)(3). CEQA Guidelines Section 15364 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors."

For those significant impacts that cannot be mitigated to a less than significant level, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects" (CEQA Guidelines Sections 15093 and 15043[b]; see also Public Resources Code Section 21081[b]).

The following significant environmental impacts of the proposed Project are unavoidable and cannot be feasibly or effectively mitigated to a less than significant level. In accordance with CEQA Guidelines Section 15093, a Statement of Overriding Considerations is set forth below in Section VII to substantiate the County's decision to accept these unavoidable substantial, adverse environmental effects because of the benefits afforded by the Project.

For the proposed Project resource category discussed below, the following sections are provided:

- **Impact:** A specific description of the significant environmental impact(s) identified in the Program EIR.

- **Mitigation:** Identified feasible mitigation measures that are required as part of the proposed Project. (If mitigation is infeasible, the reasons supporting the finding that mitigation is infeasible are discussed below under "Facts in Support of Findings.")

- **Finding:** One or more of the three specific findings set forth in CEQA Guidelines Section 15091.

- **Facts in Support of Finding:** A summary of the reasons for the finding(s) is provided for each impact. Additional substantiation regarding the feasibility (or infeasibility) of mitigation is provided at the end of this section (which is relevant to all impacts under the given resource category).

1. Transportation Impact TR-2

Environmental Impact:

The proposed Project would have a significant and unavoidable impact related to transportation as follows:

- **Impact TR-2:** The proposed Project could conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Mitigation Measures:

Impact TR-2 **M M 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 Traffic Impact Analysis (TIA) Guidelines that may be applicable to commercial cannabis businesses include:

Commute Trip Reduction (CTR) Programs with Required Monitoring

This measure would implement a mandatory CTR program with employers. CRT programs discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking, thereby reducing vehicle miles traveled (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.

Findings: The County hereby adopts CEQA Findings 1 and 3.

Facts in Support of Findings:

Impact TR-2:

- The proposed Project could result in a potentially significant impact related to VMT. The majority of the proposed commercial cannabis business types would not be expected to substantially alter existing land use patterns or generate VMT beyond that associated with other uses currently permitted within commercial and industrial zoning districts. It is anticipated that many commercial cannabis businesses would likely generate fewer 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 proposed 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 proposed 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, requiring future applicants to provide project-specific VMT studies as a condition of commercial cannabis licensing is not considered feasible for the proposed Project. The proposed Project would establish a ministerial Site Plan Review and licensing process based on objective standards. If a license applicant cannot satisfy those requirements, it would be ineligible for licensure. Requiring project-specific VMT studies as a condition of approval is not considered feasible for the proposed Project. Such a requirement would introduce a discretionary review framework, such as a Conditional Use Permit (CUP), which is inconsistent with the Project's ministerial structure and would conflict with Project Objective No. 5 to provide an efficient, clear, and streamlined licensing process. Further, even with future site-specific VMT analysis, mitigating VMT generated by customer/visitor, delivery, and distribution trips would remain a challenge. In many cases, these trip types are driven by customer behavior, market demand, and supply-chain logistics, making them difficult to reduce through feasible project-level mitigation measures.

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 to 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. Further, 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*.

IV. ALTERNATIVES TO THE PROPOSED PROJECT

A. Alternatives Considered and Rejected During the Scoping/Project Planning Process

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the Program EIR.

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.[3] 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 Supervisorial Districts, and in the Antelope Valley in the Fifth Supervisorial District, where properties tend to be relatively large and spread apart." With so few eligible parcels, it would both prevent a reasonable number of businesses from identifying a viable location which would not be consistent with Project Objectives and lead to equity concerns by concentrating businesses in certain areas.

The County considered and ultimately incorporated multiple land use compatibility measures, including license caps, geographic concentration limits, buffers from youth-oriented uses, buffers from treatment facilities, and storefront separation requirements. Increasing buffers beyond those incorporated into the Project would provide diminishing land use benefits while substantially reducing location opportunities.

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] https://file.lacounty.gov/SDSInter/bos/bc/1039228_2017-06-19CannabisReceiveandFileReportSIGNEDfor BOS.pdf

Discretionary Approvals

This alternative would require a 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 generally subject to project-specific environmental review and require case-by-case evaluation rather than approval based solely on objective standards.

The alternative was considered but rejected because it would substantially undermine key Project Objectives related to administrative efficiency, predictability, accessibility, and participation in the regulated market. Discretionary approval of a CUP is a lengthy, complex, and resource-intensive process, with processing times ranging from approximately 9 months for relatively simple projects to several years for more complex proposals. These extended timelines can result in significant carrying costs for applicants seeking to maintain control of a proposed business location throughout the entitlement process. The increased time, cost, and uncertainty associated with obtaining discretionary approvals could also create additional barriers for Social Equity applicants and other small businesses seeking to participate in the regulated market. In addition, 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. Together, these factors could discourage participation in the regulated market, increase barriers to entry, and reduce the effectiveness of the County's efforts to transition cannabis activity into a licensed and regulated framework.

B. Alternatives Selected for Further Analysis

The following alternatives were determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the proposed Project but avoid or substantially lessen any of the significant effects of the proposed Project.

No Project Alternative

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate the specific alternative of "no project" along with its impact. As stated in this section of the CEQA Guidelines, the purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving a proposed project. As specified in CEQA Guidelines Section 15126.6(e)(3)(A), when a project is the revision of an existing land use or regulatory plan or policy or an ongoing operation, the No Project Alternative will be the continuation of the plan, policy, or operation into the future.

The proposed Project involves amendments to the 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, the County would not establish a local licensing, compliance, inspection, or administrative enforcement framework for commercial cannabis businesses within the unincorporated areas.

Under the No Project Alternative, direct impacts associated with implementation of a regulated commercial cannabis program would be avoided. However, the County also would not establish regulatory oversight, land use controls, compliance inspections, administrative enforcement mechanisms, or operating requirements to mitigate environmental impacts. As a result, the No Project Alternative would not provide the same tools to manage potential environmental issues associated with cannabis operations and the lack of oversight would result in greater indirect environmental effects, particularly related to including impacts to air quality, energy, GHG emissions, hazards and hazardous materials, land use and planning, transportation, and utilities and service systems. Transportation impacts could remain significant and unavoidable due to unsafe or unplanned access patterns, but without the ability to regulate or mitigate impacts.

Finding: 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 incentives, 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 continued cannabis prohibition would not meet the Project Objectives and would forgo the regulatory oversight, land use controls, compliance inspections, administrative enforcement mechanisms, social equity opportunities, and environmental mitigation measures that would be established under a well-regulated licensing program.

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.

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 responds to some community concerns regarding the location of retail cannabis businesses in high-visibility pedestrian areas and impacts related to traffic and parking.

Potential impacts to air quality, energy, GHG emissions, hazards and hazardous materials, and utilities and service systems under Alternative 1 are expected to be similar to the proposed Project and would remain less than significant. Limiting retail and delivery uses to higher-intensity commercial and industrial zones would result in slightly reduced land use conflicts, making land use and planning impacts slightly less adverse than the proposed Project. Transportation impacts would remain significant and unavoidable and generally similar to the proposed Project because the alternative would not reduce the overall number of licenses or materially change the volume of customer, employee, and delivery trips generated by commercial cannabis businesses. Although trips may be redistributed among eligible locations, the alternative would not substantially reduce overall Vehicle Miles Traveled (VMT) associated with Project implementation.

Finding: 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 result in greater concentration of eligible locations within areas where industrial zoning is more prevalent, particularly in the First, Second, and Fifth Supervisorial Districts. This alternative would also limit access to legal, tested cannabis in areas with few industrial zones.

In addition, reducing the number and geographic distribution of eligible retail and delivery locations may limit opportunities for Social Equity applicants to identify viable business sites and participate in the regulated market.

Although Alternative 1 is feasible and would provide additional restrictions on retail cannabis locations, the proposed Project already incorporates multiple measures intended to address community concerns regarding overconcentration and neighborhood compatibility, including license caps, Supervisorial District caps, Planning Area caps, separation requirements between storefront retailers, and buffers from youth-oriented uses and treatment facilities. As a result, Alternative 1 would not fully achieve the Project Objectives related to geographic access, economic opportunity, and social equity, while providing only limited additional land use benefits beyond those already incorporated into the proposed Project.

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 proposed 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).

Under Alternative 2, impacts to air quality, energy, GHG emissions, hazards and hazardous materials, land use and planning, and utilities and service systems would be similar to or slightly less adverse than the proposed Project, and would remain less than significant, primarily due to the elimination of higher-risk volatile manufacturing processes. Reductions in hazardous material use and energy demand would modestly improve environmental outcomes relative to the proposed Project. However, transportation impacts would remain similar to the proposed Project and significant and unavoidable, as overall trip generation and VMT effects would not substantially change.

Finding: 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.

Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(E)(2) requires an analysis of alternatives identifying 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.

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 Section 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 Delivery 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 may provide limited environmental benefits relative to the proposed Project, neither alternative would eliminate or substantially reduce the significant and unavoidable transportation impact associated with VMT, 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.

V. STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to Public Resources Section 21081(b) and CEQA Guidelines Section 15093(a) and (b), the County is required to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. The lead or responsible agency may then approve the project and adopt a "Statement of Overriding Considerations," which states in writing the specific reasons to support the lead or responsible agency's action based on the Program EIR and other information in the record (CEQA Guidelines Sections 15093 and 15096[h]). These Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Program EIR, public testimony, and all other materials that constitute the record of proceedings.

The County finds and determines that: (1) all significant environmental effects of the proposed Project have been substantially lessened where feasible; (2) the proposed Project will result in certain significant adverse environmental effects that cannot be avoided or reduced to a less-than-significant level even with incorporation of all feasible mitigation measures; and (3) there are no other feasible mitigation measures or feasible alternatives to the proposed Project that will further mitigate, avoid, or reduce the remaining significant environmental effects to a less-than-significant level.

The County finds that the adoption and implementation of the Commercial Cannabis Business Licensing Program will have the following economic, social, legal, and other considerable benefits:

- The Project would establish a legal and regulated commercial cannabis marketplace in the unincorporated areas of Los Angeles County, supporting lawful business activity, employment opportunities, and County tax revenues while providing a framework for ongoing oversight and accountability. The County estimates that commercial cannabis businesses could generate up to $10 million annually in cannabis business tax revenue and support up to 1,200 full-time jobs.

- The proposed Project would advance social equity by prioritizing eligible Social Equity applicants for available licenses and providing access to legal, financial, and technical resources intended reduce barriers to participation in the regulated cannabis industry. These resources are designed to support individuals disproportionately impacted by cannabis prohibition and past cannabis enforcement policies.

- The proposed Project would establish a comprehensive local regulatory framework aligned with State law and the California Department of Cannabis Control licensing system that governs where cannabis businesses may locate, the conditions under which they may operate, and the standards they must satisfy to obtain and maintain licensure. The framework would provide clear rules and accountability measures that do not exist under the current prohibition-based approach.

- The proposed Project would promote public health, safety, consumer protection, and accountability by requiring licensed cannabis businesses to comply with operational and compliance requirements, including security plans, age verification, State track-and-trace requirements, product testing, annual inspections, renewal requirements, compliance standards, violation procedures, and County enforcement authority.

- The proposed Project would allow the County to pursue State grant funding that is available to local governments that allow and regulate commercial cannabis activities. This funding may be used to support enforcement against illicit cannabis businesses. Access to these funding opportunities would strengthen the County's ability to address unlicensed cannabis activity and associated public health and safety concerns while supporting implementation of the regulated market.

- The proposed Project would promote land use compatibility and reduce the potential for youth exposure to commercial cannabis businesses through objective zoning standards, location restrictions, license caps, geographic distribution requirements, and separation requirements. These measures include a 600-foot buffer from youth-oriented uses, a 600-foot buffer from drug and alcohol treatment facilities, a 500-foot separation requirement between licensed storefront retailers, limits on licenses by Supervisorial District, and geographic concentration limits by Planning Area.

- The proposed Project incorporates numerous environmental and land use safeguards, including restrictions on eligible locations, indoor cultivation requirements, operation within existing structures served by existing utilities, and prohibitions within Significant Ecological Areas, reducing potential environmental impacts compared to a less regulated approach. e.

- The proposed Project would establish a coordinated oversight structure involving multiple County and State agencies with specialized review, permitting, inspection, tax administration, compliance and enforcement responsibilities, including the Office of Cannabis Management, Department of Public Health, Fire Department, Department of Regional Planning, Treasurer and Tax Collector, and the California Department of Cannabis Control.

- The proposed Project would provide a clear, transparent, and administrable ministerial licensing and Site Plan Review process based on objective standards, supporting consistent and predictable implementation for applicants, County departments, and the public. The Project would also preserve the County's ability to deny applications that do not satisfy Program requirements.

After balancing the specific economic, social, legal, and other considerable benefits of the proposed Project, the County finds that the remaining significant and unavoidable environmental effects are acceptable due to the factors described in the Statement of Overriding Considerations above.