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SUPPLEMENTAL REPORT TO THE REGIONAL PLANNING COMMISSION

DATE ISSUED:	August 20, 2026	
HEARING DATE:	8/26/2026	AGENDA ITEM: 11
PROJECT NUMBER:	PRJ2024-000811	
PROJECT NAME:	Commercial Cannabis Zoning Ordinance	
PLAN NUMBER(S):	RPPL2024001191	
SUPERVISORIAL DISTRICT:	1-5	
PROJECT LOCATION:	Countywide	
PROJECT MANAGER:	Fernando G. Nieto, Program Chief Fnieto@dcba.lacounty.gov	

RECOMMENDATION

LA County staff ("staff") recommends **CONTINUANCE** of Project Number PRJ2024-000811, Advance Planning Case Number RPPL2024001191, and Program Environmental Impact Report Environmental Assessment Number RPPL2024005648, to October 21, 2026, without opening the public hearing.

Staff recommend the following motion:

CONTINUANCE:

I MOVE THAT THE REGIONAL PLANNING COMMISSION CONTINUE THE PUBLIC HEARING FOR ADVANCE PLANNING CASE NO. RPPL2024001191 AND PROGRAM ENVIRONMENTAL IMPACT REPORT ENVIRONMENTAL ASSESSMENT NUMBER RPPL2024005648 FOR THE COMMERCIAL CANNABIS ZONING ORDINANCE WITHOUT OPENING THE PUBLIC HEARING, TO OCTOBER 21, 2026.

BACKGROUND

Advance Planning Case No. RPPL2024001191 is a proposed zoning ordinance that amends Title 22 (Planning and Zoning) of the Los Angeles County Code to establish commercial cannabis businesses in certain locations and the applicable development standards within the unincorporated areas of Los Angeles County ("Zoning Ordinance").

PROJECT UPDATE

Staff recommends this item be continued without opening the public hearing, to October 21, 2026. In response to public comments, the requested continuance will allow the proposed Title 8 amendments to be made available for public review in advance of the October hearing to consider the Title 22 amendments.

PUBLIC COMMENTS

Since August 13, 2026, the County has received four additional public comments for the Project.

Report Reviewed By: Fernando G Nieto

Fernando G. Nieto, Program Chief

Report Approved By: Laura Magallanes

Laura Magallanes, Deputy Director

ACTON TOWN COUNCIL
P.O.Box 810, Acton CA 93510

The Honorable Regional Planning Commission
County of Los Angeles
320 W. Temple Street, Room. 1360
Los Angeles, CA 90012
Electronic transmission of a 13 page letter to:
commission@planning.lacounty.gov

August 14, 2026

Subject: Los Angeles County Commercial Cannabis Business Licensing Program.

References: PRJ2024-000811.
Case No.: RPPL2024001191.
State Clearinghouse No.: 2025030223.
Regional Planning Commission Hearing August 26, 2026; Item 11.
Final Environmental Impact Report dated June, 2026.

Honorable Commissioners:

The Acton Town Council respectfully submits the following comments offered pursuant to the proposed Los Angeles County Commercial Cannabis Business Licensing Program and the referenced Final Environmental Impact Report (EIR) prepared by the Office of Cannabis Management (OCM). These comments are arranged topically, and they broadly pertain to the "Cannabis Framework", its implications, and its associated environmental impacts as they are described in EIR and will be established by proposed revisions to the County Code (specifically, Title 8 and Title 22).

It is hoped that these comments have been submitted early enough to be these comments are limited to concerns pertaining to the EIR and proposed revisions to Title 22; they do not address matters raised in the Staff Report because the Staff Report was only issued yesterday and we have not had an opportunity to review it. Additionally, the enclosed comments do not address matters pertaining to proposed revisions to Title 8 because the County has not yet released these proposed revisions. The Acton Town Council may provide additional comments to supplemental the matters raised herein after we have reviewed the Staff Report and other documents posted with the August 26 agenda. It is possible that you may not receive such supplemental comments until just before the hearing; we apologize in advance for any inconvenience that this may create.

SIGNIFICANT IMPACTS UNDER THE CANNABIS FRAMEWORK WILL NOT BE MITIGATED BECAUSE REGULATIONS/PERMIT CONDITIONS WILL NOT BE ENFORCED.

the Acton Town Council has previously pointed out that significant environmental impacts will result from the proposed Cannabis Framework if it is not anchored by a commitment to enforce permit conditions and regulatory requirements. The County has never actually evinced such a commitment, and the EIR does not compel enforcement of any provisions established by the Cannabis Framework. For instance, page 2-13 states "Any business that fails to comply with all County and State regulations ***may*** be subject to enforcement actions, including fines, license suspension, or revocation" (emphasis added), and page 9-7 states that OCM will enforce "most" (not all) operating requirements for licensed commercial cannabis businesses. It is clear from these statements that the County's enforcement obligations under the Cannabis Framework are optional, not mandatory.

In response to these concerns, the EIR states on page 9-103

- "impacts would be avoided, minimized, or reduced to a less than significant level through the proposed restrictions and/or regulatory requirements";
- "the proposed project includes specific restrictions and regulatory requirements that would avoid or minimize environmental impacts. This outcome is due to the reliance on existing regulations and permitting requirements as well as the proposed Title 22 standards"; and
- "impact minimization" depends on the "mandatory implementation of regulatory requirements as a condition of approval for the proposed project".

These conclusions unequivocally establish that mitigation of the significant impacts created by the Cannabis Framework will depend entirely on regulatory compliance. Yet, and incredibly, the EIR also declares that "impact minimization" within the Cannabis Framework does not depend on "enforcement"; it even characterizes "enforcement" as "speculative". These contradictory statements cannot be reconciled: given that "impact mitigation" depends on "regulatory compliance", and given that "regulatory compliance" depends on "enforcement" of standards and regulations, it is axiomatic that "impact mitigation" depends on "enforcement"[1]. Nonetheless, the EIR adopts the logical fallacy that "impact minimization" does not depend on "enforcement".

The Acton Town Council concurs with the premise adopted by the EIR that "impact minimization" is entirely dependent on regulatory compliance; however, we also recognize that, *without enforcement, there can be no regulatory compliance*. The EIR fails to grasp this, and does not recognize that "regulatory compliance" and "enforcement" are two sides of

[1] Transitive logic holds that, If A causes B, and B causes C, then A causes C (transitive causality)

the same coin. Instead, the EIR considers improperly considers "regulatory compliance" and "enforcement" to be separate, distinct, and mutually exclusive activities. They are not. Furthermore, if it is true that the enforcement mechanisms needed to achieve regulatory compliance are not guaranteed by the Cannabis Framework, then regulatory compliance is not guaranteed and, by extension, the significant impacts that are supposedly mitigated through regulatory compliance *will not be mitigated and will remain significant*.

The EIR assumes that all potentially significant impacts posed by a proposed cannabis development will be fully addressed at the permit stage and mitigated by permit conditions imposed in the site plan review process[2]; it also assumes that cannabis businesses will comply with all permit conditions and regulations because it considers the need for enforcement to be "speculative". However, the record shows these assumptions to be specious and lacking in foundation because it provides extensive and substantial evidence demonstrating that the need for enforcement is never "speculative". Specifically, the evidentiary record proves conclusively that developers in unincorporated Los Angeles County persistently and routinely violate permit conditions, ordinances, and regulations in a manner that creates significant environmental impacts[3]. This record evidence entirely controverts the premise that enforcement is speculative, and it demonstrates that enforcement must be embedded as an essential mitigation measure in the Cannabis Framework to ensure permit conditions are met, regulatory compliance is achieved, and significant impacts are mitigated. To illustrate this point, consider the following scenarios that will occur if the proposed Cannabis Framework is approved:

- A licensed cannabis business in a residential area[4] hires armed security guards to patrol the premises 24 hours per day. Because these armed patrols will respond to aggression with deadly force, their presence near homes poses very significant public safety risks. Residents inform the County regarding these unsafe conditions, but the concerns are dismissed as irrelevant under the Cannabis Framework EIR.

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[2] Page 9-103 states environmental impacts are mitigated by permit conditions and minimized because cannabis businesses will be subject to site plan review and limited to existing, legally constructed structures.

[3] See Acton Town Council Scoping Comments submitted on April 4, 2025. Another example pertains to an RV park located in a flood plain. Because of flood risks, the CUP issued in 2006 limited park operation to summer months and required compliance with State water quality regulations. The County has never enforced these conditions, to the park has always operated year round and in violation of state water regulations. [https://documents.geotracker.waterboards.ca.gov/regulators/deliverable_documents/5989270865/Action%20Camp_Incomplete%20Application_File%20no.22-021_2022-05-02.pdf]. County enforcement failures have resulted in significant environmental impacts. For example, campground flooding during heavy rains introduces contaminants (oil, gasoline, trash, etc.) into the river. Additionally, the inundation of unsealed septic connections and facilities within the floodplain results in the release of raw sewage into the reiver. The CUP is now expired, yet the County allows the RV park to continue operating without a permit and in violation of critical mitigation measures that were adopted to minimize significant environmental impacts.

[4] The EIR assert that the Cannabis Framework limits cannabis businesses to industrial and commercial zones, but in communities like Acton, commercial and industrial zones are located within residential neighborhoods.

- After a microbusiness is licensed to cultivate, manufacture, and distribute cannabis, it decides to expand its cultivation operation beyond the permitted 10,000 square feet by converting its warehouse facilities into a grow operation. The resulting odor impact in the surrounding residential area is persistent and significant. Residents notify the County, but the facility continues operating in this manner for years because the Cannabis Framework does not compel enforcement or the recission of licenses for facilities that do not comply with their "Odor Management Plan".

In claiming that impact mitigation does not depend on enforcement, the EIR perpetuates a logical fallacy which renders all environmental impact mitigation claims erroneous and unsubstantiated. Furthermore, unless the EIR is revised to affirm that enforcement is obligatory and essential for achieving regulatory compliance and substantial impact reduction, the significant impacts which the EIR claims are reduced to "Less than Significant" will in fact *not* be reduced and the County is prohibited from finding that they are. These impacts include, but are not limited to, public safety, air quality/odor, and land use. Furthermore, implementing a mitigation measure within the Cannabis Framework that compels the County to enforce state and local regulations is not only feasible; it is essential for reducing significant impacts. And, because CEQA requires the County to adopt all feasible mitigation measures if they are shown to substantially reduce impacts[5], CEQA compels the County to incorporate enforcement of state and local regulations as a mandatory element of the Cannabis Framework.

THE EIR MISREPRESENTS ACTON TOWN COUNCIL COMMENTS PERTAINING TO AIR QUALITY IMPACTS AND THEN FAILS TO ADDRESS THEM

The Acton Town Council has demonstrated that cannabis cultivation, manufacturing, warehousing, and distribution operations pose very real and very significant air quality impacts because of the stench they create[6]. Instead of addressing these concerns, the EIR mischaracterizes them as mere complaints that air quality impacts will be significant because odor control plans and air district regulations "would not be effectively enforced". Ironically, the EIR explicitly affirms the legitimacy of our concerns because it clearly establishes that the County is not obligated to enforce any regulations under the Cannabis Framework and it even goes so far as to assert that "impact minimization" does not depend on "enforcement" (as explained above). Obviously, these claims are erroneous: Significant odor impacts created by the Cannabis Framework *will not be reduced* if the County chooses not to enforce applicable regulations. Moreover, the mere existence of an "Odor Management Plan" required by Chapter 11.37 of the County Code does nothing to reduce odor impacts because a plan is nothing more than a document that is intrinsically incapable

[5] California Public Resources Code Section 21002.
[6] National Library of Medicine and Department of Interior: https://pmc.ncbi.nlm.nih.gov/articles/PMC9236214/

of mitigating anything (as we pointed out in our letter dated March 30, 2026). This is particularly true given that it is the cannabis business operator and not the County who is responsible for ensuring compliance with the plan and maintain complaint records[7]. And, because Chapter 11.37 ***does not*** compel the County to suspend or revoke licenses when cannabis businesses fail to implement odor management plans[8], odor control ***is not*** guaranteed by Chapter 11.37. Accordingly, implementation of Chapter 11.37 does not reduce odor/air quality impacts to a level that is "Less than Significant".

Equally important, the concerns expressed by the Acton Town Council regarding odor and air quality impacts went far beyond mere "odor control plans" required by Chapter 11.37 of the County Code; yet, they were completely ignored. For instance, the Acton Town Council showed there is no evidence to support the EIR's claim that compliance with local air quality regulations[9] will reduce odor and air quality impacts to a level that is "Less than Significant" because *local air quality regulations do not require odor controls on cannabis businesses*. This fact controverts the EIR's claim that odor and air quality impacts of the Cannabis Framework are "Less than Significant", and it remains unrefuted in the record.

To ensure that odor/air quality impacts created by the Cannabis Framework are substantially reduced, the Acton town Council respectfully requests that the Planning Commission amend the development standard proposed for Title 22 to include mandatory emission control facilities and provisions which compel the suspension of cannabis business operations when "Odor Management Plans" are violated.

THE EIR IGNORES MATERIAL PUBLIC SAFETY CONCERNS.

The EIR dismisses concerns pertaining to the significant public safety risks posed by the Cannabis Framework by pointing to the Initial Study which states that public service impacts are "Less than Significant". However, declarative and uncorroborated statements that are not supported by facts do not constitute "substantial evidence" and cannot be relied upon in an EIR as evidence regarding the significance of an environmental impact. The EIR also concludes the Cannabis Framework poses no public safety impacts because it imposes locational restrictions pertaining to geography, services, and infrastructure and it only authorizes a "limited number of commercial cannabis businesses"[10]. This conclusion

[7] The EIR confirms this on page 9-104.

[8] Section 11.37.070.G merely states that failure of an operator to submit and implement an Odor Management Plan ***may*** result in the suspension of the cannabis facility's public health permit. Because the operative word in Section 11.37.070.G is *may* and not *shall*, implementation of Section 11.37.070.G does not ensure significant reductions in odor and air quality impacts.

[9] These regulations have been promulgated by the South Coast Air Quality Management District (SCAQMD) and the Antelope Valley Air Quality Management Control District (AVAQMD).

[10] Page 9-6 to 9-7.

is specious because 1) the number of commercial cannabis business licensed ***is not*** limited by the Cannabis Framework[11]; and 2) the "locational" restrictions pertaining to geography, services and infrastructure that are alleged by the EIR do not exist in fact or in law[12]. This point is clearly demonstrated by OCM's own mapping platform which identifies remote rural areas as viable locations for future cannabis businesses *even though these areas have no public services or public infrastructure* (as explained below).

The public safety risks posed by the Cannabis Framework are driven by a number of factors unrelated to the number of cannabis licenses issued or phantom "locational restrictions". For example, public safety impacts are significant and unmitigable when cannabis businesses are located in residential neighborhoods[13] and deploy armed guards who are instructed to respond to threats with extreme prejudice. The EIR completely ignores such public safety impacts.

The EIR also declares that public safety impacts will be "Less than Significant" because cannabis businesses will be subject to state and local regulations[14]; however, the EIR also vaguely clarifies that only *some* of the operating requirements imposed by these regulations will be enforced.[15] This vague clarification substantially undermines the claim that public safety impacts will be substantially reduced by state and local regulations; after all, how can state and local regulations reduce public safety impacts if they aren't even enforced?

The EIR further states that, although OCM is responsible for implementing the Cannabis Framework, OCM's actual involvement is limited to merely "receiving and reviewing complaints" and "coordinating with appropriate agencies"[16]. This explains why the breadth and depth of the EIR are so limited: the EIR merely addresses a "regulatory program" in which OCM serves as the "Lead Agency" to "manage and monitor commercial cannabis activities"[17]; accordingly, the scope of the EIR is constrained to just matters which pertain

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[11] Page 1-7 clearly establishes that the Cannabis Framework allows the Board of Supervisors to increase the number of cannabis business licenses that are issued without limit.

[12] Page 9-4 of the EIR alleges that cannabis businesses will be restricted to areas with public infrastructure, public utilities, and public services; however, these restrictions are not reflected in the proposed revisions to Title 22, and the "Operating Requirements" that are alleged to be created by undisclosed Title 8 revisions do not require cannabis businesses to be served by infrastructure, utilities, or public services. In short, the "project" (consisting of revisions to Title 8 and Title 22) *does not* restrict cannabis business to areas with public infrastructure, public utilities, and public services; therefore, EIR claims that such locational restrictions exist are empty, uncorroborated, and utterly baseless.

[13] As the Acton Town Council has repeatedly explained, virtually all the locations identified by OCM as potential cannabis business sites in Acton are within residential areas.

[14] Page 9-7.

[15] The EIR confirms that at least some operating requirements imposed by state and local regulations will not be enforced because page 9-7 states that OCM will only enforce "most" operating requirements.

[16] Page 9-7.

[17] Pages ES-1 to ES-2.

to OCM's "management and monitoring" of this "regulatory program" and the impacts that derive from such "management and monitoring" activities. In other words, the EIR does not address concerns pertaining to public safety and emergency response because such matters lie outside of OCM's purview *even though these concerns will arise as a direct result of administrative actions that OCM takes under the Cannabis Framework.* This explains why the EIR fails to consider whether armed cannabis businesses pose a public safety threat to surrounding residential areas even though the record clearly demonstrates that they do[18]. Instead, the EIR appears to relegate such matters to the Sherriff's Department, County Counsel, and the District Attorney's office[19] and then ignores them because they lay outside of OCM's purview.

OCM does not seem to understand how CEQA works.

CEQA compels the County to address the "whole of a project"[20] and, by extension, consider all potentially significant impacts resulting from the "whole" project regardless of whether such impacts pertain to matters that lie outside the purview of the "Lead Agency". The EIR does not comply with this most fundamental tenet of CEQA and is therefore fatally flawed by its failure to address the significant public safety impacts that will result from OCM's approval of armed cannabis businesses in residential areas. The EIR will not be redeemed until it is revised to address these significant public safety impacts and implement feasible mitigation measures. The Acton Town Council recommends that such mitigation measures include a minimum 300 foot buffer between a proposed cannabis site and all adjacent residential uses.

The EIR openly acknowledges that it has "cherry picked" which impacts are addressed because page 9-7 explains that public safety considerations were limited to just the physical changes in the environment that could result from development of new or altered fire and Sheriff facilities. The EIR ignores physical changes to the environment that could result from the ministerial authorization of new uses in residential areas that involve patrolling armed guards who are directed to respond to aggression with extreme prejudice. It ignores the physical changes to the environment that are created by bullets whizzing in the air. It ignores the physical changes to the environment that occur when solvent extraction operations explode, and it certainly does not address how such physical changes and their

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[18] https://www.abc10.com/article/news/local/sacramento/south-sacramento-dispensary-security-guard-charged-fatal-shooting-burglary/103-a60f0063-ac0d-4331-a7e5-9c19767cd828 , https://abc7.com/post/man-fatally-shot-marijuana-clinic-whittier/16230836/ . https://bakersfieldnow.com/news/local/shooting-at-marijuana-dispensary-leaves-two-dead-five-arrested-including-two-minors . https://www.npr.org/2022/04/20/1093841615/pot-shop-robberies-are-fueling-calls-for-a-u-s-banking-bill . .

[19] Page 9-7.

[20] CEQA Guidelines Section 15003(h).

associated impacts are magnified in Very High Fire Hazard Severity Zones. Because the Cannabis Framework will result in these and other physical changes to the environment, and because these physical changes to the environment create significant impacts, CEQA compels the county to address these significant environmental impacts and mitigate them to the greatest extent feasible. And, because the EIR ignores these impacts, it is fatally flawed and cannot be certified by the County.

Finally, the Acton Town Council is troubled by the fact that only some state and local regulations will be enforced as part of the Cannabis Framework, and we believe that the public should be fully appraised regarding which state and local regulations will be enforced by the County and which will not. Accordingly, the Acton town Council respectfully requests that the Planning Commission direct staff to specifically articulate which state and local regulations will not be enforced under the Cannabis Framework and also explain why they will not be enforced.

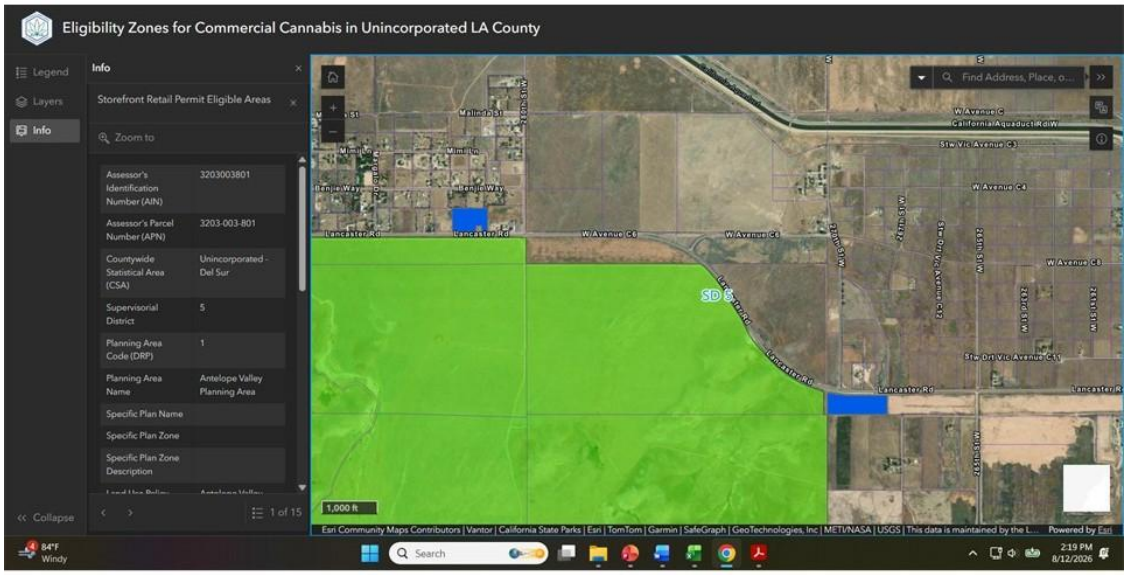
EIR CLAIMS THAT CONSTRUCTION IMPACTS WILL BE "LESS THAN SIGNIFICANT" ARE NOT SUPPORTED BY THE EVIDENTIARY RECORD.

The Acton Town Council has repeatedly pointed out that proposed revisions to Title 22 and the Cannabis Framework described by the EIR do not restrict cannabis businesses to existing structures; accordingly, there is no substantial evidence to support the EIR's conclusion that the "project" will not result in new or cumulatively considerable environmental impacts resulting from new construction. For example, we pointed out that proposed Title 22 revisions do not restrict cannabis businesses to existing building and thus do not preclude new construction within the Cannabis Framework. We also pointed out that proposed revisions to Title 8 have not been released and thus the public cannot assess whether the project will indeed restrict cannabis businesses to existing structures and thereby eliminate the potential for new and/or cumulatively considerable significant impacts due to new construction. We also pointed out that the "Operating Requirements" described by the EIR which are alleged created by undisclosed Title 8 revisions are not sufficiently detailed to confirm that cannabis businesses will be limited to existing structures. The EIR dismisses these concerns by claiming that, per Title 22, "the Project does not authorize new construction"[21]. However, *proposed revisions to Title 22* ***do not appear to contain any provision which precludes new construction for cannabis businesses;*** certainly, the "development standards" established by proposed revisions to Section 22.14.134 do not include any such provisions.

[21] Page 9-4.

The EIR also claims that the Cannabis Framework will not result in significant environmental impacts due to new construction because cannabis businesses will not be approved unless they are located in an area that is served by sufficient infrastructure, utilities, and public services[22]; however, the record does not support this claim. Specifically, proposed Title 22 revisions *do not* include any such safeguards and the "Operating Requirements" that are allegedly secured by undisclosed Title 8 revisions are not discussed in the EIR with sufficient detail to assess their effectiveness. Worse yet, OCM clearly considers remote rural areas to be appropriate locations for cannabis businesses *even though these areas have no public infrastructure and virtually no public utilities or public services*. This fact is proven in Figure 1 which is an excerpt from OCM's map of "Eligibility Zones for Commercial Cannabis in Unincorporated LA County" that identifies the Community of Neenach as an appropriate location for establishing cannabis businesses *even though Neenach has no public infrastructure and virtually no public utilities or services*.

Figure 1. OCM Map Showing Neenach as an Appropriate Location for Cannabis Operations.



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

In other words, *OCM's own website* indicates that cannabis businesses are not restricted to areas that have public infrastructure, utilities, and service. Such restrictions are not incorporated in the proposed Title 22 revisions, and it is not clear that they are included in the Title 8 revisions (which have still not been released and are not described in the EIR with sufficient specificity to confirm their existence). Accordingly, there is no substantial evidence to support the EIR claim that cannabis businesses are restricted to areas with public services and will thus have "Less than Significant" construction impacts.

[22] Ibid.

The EIR also argues that construction impacts will be less than significant because the Initial Study and EIR assert that "site alterations" will be "limited". Because this argument relies on declarative statements found in the Initial Study and EIR and is not supported by material facts, it is not dispositive and can be accorded no weight. Furthermore, the proposed revisions to Title 22 do not include "limits" on "site alterations", and it is certainly not clear where or how the "Operating Requirements" that are allegedly created by undisclosed Title 8 revisions will impose "limits" on "site alterations". Therefore, this argument is specious because it is not corroborated by record evidence.

THE EIR FAILS TO ACCOUNT FOR SIGNIFICANT AND REASONABLY FORESEEABLE PUBLIC SAFETY AND WILDFIRE IMPACTS POSED BY THE CANNABIS FRAMEWORK

The EIR dismisses the Acton Town Council's public safety and wildfire risks pertaining to the ministerial approval of solvent-based cannabis extraction operations in fire hazard areas by arguing that compliance with fire codes and regulations will reduce such risks to a level that is "Less than Significant". This argument fails to account for the fact that industrial operations are susceptible to deflagration and explosion *even when they comply with adopted fire codes and regulations*. The ongoing industrial disaster in Boyle Heights is only just the most recent example that proves this undeniable fact; another recent example is the frozen valve on a large storage tank full of methyl methacrylate in Orange County that compelled a multi-day evacuation of more than 50,000 people[23]. Faulty equipment, operator error, undiagnosed flaws/material weaknesses in industrial equipment, and just plain bad luck render all industrial operations susceptible to failure regardless of their regulatory compliance status. That is why CEQA compels the County to recognize such events are possible, identify the circumstances under which they could result in significantly adverse impacts, and include reasonable safeguards to mitigate such impacts. CEQA does not permit the County to *pretend* that mere regulatory compliance will eliminate significantly adverse public safety or wildfire impacts.

Nonetheless, the EIR concludes that compliant solvent extraction operations and other cannabis manufacturing activities will never pose a public safety or fire risk. Such naïveté is appalling. It is also a violation of CEQA. Because compliant solvent extraction and other cannabis manufacturing operations ***do*** pose an intrinsic public safety and fire risk, and because these risks ***are*** amplified to a point where they become significant when such operations are located in residential and/or high fire hazard areas, the County is compelled by CEQA to consider and adopt mitigation measures that must be applied when such operations are located in populated or high fire hazard areas. The EIR ignores all of this, and as such, it is fatally flawed.

[23] https://edition.cnn.com/2026/05/22/us/chemical-spill-orange-county-california

CONCERNS REGARDING INCONSISTENCIES BETWEEN THE CANNABIS FRAMEWORK AND ADOPTED GENERAL PLAN POLICIES REMAIN UNREFUTED IN THE RECORD.

The Acton Town Council provided extensive comments regarding inconsistencies between the "Project" and adopted General Plan Policies[24]; we also explained that each such inconsistency constitutes a significant environmental impact that must be mitigated pursuant to CEQA if the underlying goal, policy, or objectives was adopted for the purpose of mitigating environmental impacts[25]. The EIR does not identify any errors or flaws or misstatements in the Acton Town Council's comments; in fact, the EIR ignores our comments and simply declares that the "Project" is consistent with the General Plan Policies that we identify. Accordingly, the Acton Town Council's claims regarding inconsistencies between the Cannabis Framework and adopted General Plan Policies stand unrefuted in the record, and the EIR is rendered substantially deficient by its failure to address these inconsistencies and mitigate the significant impacts that they create.

THE COUNTY'S FAILURE TO DISTRIBUTE THE PROPOSED REVISIONS TO TITLE 8 BEFORE ISSUING THE EIR CONSTITUTES A FACIAL VIOLATION OF CEQA.

The Acton Town Council has repeatedly pointed out that the public has been deprived of the right to property review the scope and extent of the proposed project because the County has refused to publish the proposed revisions to Title 8 of the County Code. Because these Title 8 revisions contain the elements of the Cannabis Framework which ensure cannabis businesses are equitably distributed and not overconcentrated within certain communities (among other things), they are essential to public consideration of all impact reduction claims asserted by the EIR. The Acton Town Council understands that they will not be released for several months[26] .

Remarkably, the EIR admits that the CEQA "project" consists solely of proposed revisions to Title 22 and Title 8[27], yet it declares that public review and consideration of proposed Title 8 revisions to be "not necessary" because the EIR describes the proposed Title 8 "Operating Requirements" in sufficient detail to assess potential environmental impacts[28]. However, the EIR does not actually describe "Operating Requirements" that will be written into Title 8; it merely states that these "Operating Requirements" will be designed to "protect public health", ensure compliance with "local and State regulations" and "create social equity criteria"[29].

[24] Acton Town Council letter dated March 30, 2026. Pages 8-9.
[25] Id at FN 7.
[26] On August 6, 2025, OCM stated that proposed revisions to Title 8 will not be released until the late Fall.
[27] Page ES-2
[28] Pages 9-5 to 9-6.
[29] Page 2-10.

Given that the EIR fails to provide ***any*** details regarding proposed Title 8 "Operating Requirements", it appears that the public is expected to just "take it on faith" that the undisclosed "Operating Requirements" will achieve the environmental impact reductions alleged by the County and thereby protect "public health" and comply with "local and State regulations". However, a declaration that undisclosed "Operating Requirements" will reduce environmental impacts by protecting "public health", ensuring "local and State regulation" compliance, and delivering "equity" *does not satisfy the County's CEQA obligation to provide sufficient project information in the EIR to allow the public to* ***independently assess*** *whether significant environmental impacts are reduced*[30]. This is particularly true in circumstances where, as here, the EIR 1) asserts that "impact minimization" does not depend on "enforcement" of local and state regulations; and 2) fails to identify any measures that ensure public safety in residential neighborhoods where cannabis businesses have elected to deploy armed patrols for security purposes.

In short, the County's failure to produce the proposed Title 8 revisions before the EIR was issued constitutes a facial violation of CEQA; this violation can only be cured by recirculating the Draft EIR after the proposed Title 8 revisions are released and initiating a second round of public review and comment.

THE UPDATED YOUTH ORIENTED USE MAP MAINTAINED BY OCM STILL FAILS TO IDENTIFY A "YOUTH ORIENTED USE" IN ACTON.

The Acton Town Council has repeatedly pointed out that Acton Faith Bible has an established "Youth Oriented Use" on Assessor Parcel Number 3208-011-052 which renders the surrounding area to be ineligible for cannabis development; yet, OCM's mapping platform indicates the area is appropriate for cannabis uses[31]. According to the EIR, OCM updated the mapping platform in April, 2026[32], yet it still ignores Acton Faith Bible's "Youth Oriented Use". The EIR states also that the County only relies on data from the California Office of Education to assess education based "Youth Oriented Uses" and thus ignores public input regarding same. This begs the question: what is the point of CEQA's public review process when the County ignores substantial evidence demonstrating the existence of approved "Youth Oriented Uses" simply because the evidence comes from the public and not the state?

[30] CEQA requires the County to provide sufficient project information to enable the public to evaluate and review the project's environmental impacts. CEQA Guidelines Section 15124.

[31] https://lacounty.maps.arcgis.com/apps/instant/sidebar/index.html?appid=df60d1a4b1014df7866949fe46519711

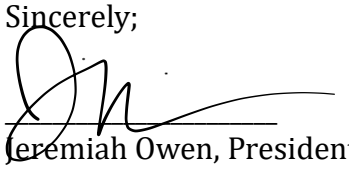
[32] Page 9-107.

The Acton Town Council respectfully requests that the Commission direct OCM to acknowledge Acton Faith Bible's Commission approved "Youth Oriented Use"[33] and update its maps accordingly to ensure that substantial evidence pertaining to potentially significant environmental impacts which is provided by the public is properly acted upon.

CONCLUSION

The Acton Town Council has provided extensive, detailed, and fully supported comments which identify fatal flaws in the Cannabis Framework EIR and we have demonstrated the manner and extent to which the EIR fails to comply with CEQA; these comments remain unrefuted in the record. Given these circumstances, the Acton Town Council respectfully requests that the Planning Commission refrain from recommending that the EIR be certified, and instead direct County staff to correct all deficiencies noted above. We also ask that staff be directed to release the proposed revisions to Title 8 on or before the date when the amended draft EIR is released in future.

Sincerely;



Jeremiah Owen, President
The Acton Town Council

[33] The Commission has repeatedly approved Acton Faith Bible's "Youth Oriented Use". CUP No. 97141. PRJ2022-004528-(5). CUP No. RPPL2022014060.

From: Jesse Frierson
To: Office of Cannabis Management
Subject: Updated Comment -8/25/26 Social Equity Eligibility
Date: Tuesday, August 18, 2026 1:13:02 AM

CAUTION: External Email. Proceed Responsibly.

Good afternoon,

I recently (10 mins ago) submitted a public comment regarding the proposed Social Equity Program eligibility criteria. After sending it, I realized that I forgot to include two important details. I would respectfully ask that this updated version be considered as my public comment instead of my previous submission.

For more than 25 years, I lived on 88th Street and Central Avenue, approximately 500 feet from the boundary separating the City of Los Angeles from unincorporated Los Angeles County. My aunt continues to live in the same house to this very day. Although my residence was technically on the City side of the boundary, my proximity to the Florence-Firestone community resulted in me attending elementary and junior high school within that area. I also played Pop Warner Football and Summer League Basketball at Rosevelt and Will Rodgers Park, which both fall within the unincorporated areas of LA County. Both of these parks and my neighborhood were SIGNIFICANTLY/SEVERELY IMPACTED BY THE WAR ON DRUGS!!!

As the Board and OCM develop the Social Equity Program eligibility criteria, I respectfully ask that consideration be given to applicants whose life experiences and connections to impacted communities extend beyond strict jurisdictional boundaries. I meet the income requirements and have two prior cannabis-related arrests/convictions. **One of those arrests actually occurred within an unincorporated area of Los Angeles County**, further demonstrating my direct connection to the communities and enforcement practices that this Social Equity Program is intended to address.

I would hate for living only a few hundred feet on the opposite side of an invisible jurisdictional line to disqualify me despite spending more than 25 years in the immediate community, attending schools in the Florence-

Firestone area, and personally experiencing cannabis enforcement within unincorporated Los Angeles County.

I hope the final program includes multiple pathways to establish social equity eligibility, including income, cannabis-related arrests or convictions, school attendance, and substantial ties to communities disproportionately impacted by cannabis enforcement. Such an approach would ensure that eligibility reflects an applicant's actual lived experience rather than being determined solely by a jurisdictional boundary.

Thank you for allowing me to clarify my comments and for your consideration.

Jesse Frierson

[redacted]

Sent from my iPhone

From: Dee Bee
To: Office of Cannabis Management; hollyjmitchell@bos.lacounty.gov; Dee Bee
Subject: NO to cannabis dispensaries in unincorporated LA County
Date: Tuesday, August 18, 2026 2:32:29 AM

CAUTION: External Email. Proceed Responsibly.

Regional Planning Commissioners:

Please add this email to the list of public comments regarding the upcoming hearing on expanding cannabis dispensary licenses to unincorporated Los Angeles County. The very fact that our 2nd District Supervisor, Holly J Mitchell, continually pushes for these criminal activities to be legalized stands as a further testament to just how out of touch she is with the will of the residents of our area.

As a community organizer, I have seen firsthand how inept the Office of Cannabis Management is and how poorly they have handled the issue of illegal cannabis businesses. In unincorporated West Rancho Dominguez, East Gardena and Rosewood, several well-known cannabis dispensaries have been operating for MANY YEARS unabated, all at addresses where it is ILLEGAL for them to operate. Having spoken with the attorneys associated with the OCM, it became obvious that they felt their hands were tied in any efforts to protect the public from the abuse of having these illegal operations right next to our homes, businesses and schools. If the OCM cannot initiate legal proceedings and remove existing cannabis dispensaries who should never have been allowed a foothold in our communities, why should we believe that they will do anything to properly regulate them once these people are allowed a license to exist?

Beyond the fact that operations like 'Gardena Gardens 25 Cap' (14700 S Main St, East Gardena) and Avalon Daily Greenz (15320 S Avalon Bl, West Rancho Dominguez) and a third operation called 'Ava +' (15324 S Avalon) are supplying a drug-addled public with toxic substances on a daily basis, these illegal storefronts are a blight on our community. The fact that they refuse to pay taxes on their goods and property robs our neighborhoods and our County government of much needed resources. For the hundreds of potheads who run in and out of those businesses--lawbreakers who often double park on major streets such as Avalon Bl and/or dart across the road in front of oncoming traffic--these businesses are not paying the taxes required by law to function on those properties even if they WERE licensed. The owner/operator of Avalon Daily Greenz has not paid a dime of property tax to the L.A. County Assessor in YEARS; they have been delinquent in paying taxes since they illegally moved into that location for the past three years and had not paid property tax on their previous location since 2018. Since they have no business license to operate, it is obvious that in spite of the thousands of dollars they generate each day, they are not paying County, State or Federal taxes either, as any other business would be required to do. Even the Yelp app warns potential customers that these businesses are being operated illegally. Again, if the OCM has allowed them to skirt the law and avoid paying taxes, why should we believe that they will be better regulated in the future?

As for 'environmental impact,' those of us who live in the Metro unincorporated areas know that the County does not care one jot about the poisonous environment County officials have

created here over the years. We have spent the past decade fighting off hundreds of filthy, rat infested motorized hovels with little help from County entities, and we have continually been forced to breathe the stench of leachate and dimethyl sulfide trucked into our neighborhood from the Chaquita Canyon Landfill site, in spite of our protests. Now you expect us to tolerate a proliferation of drug dispensaries wherein the putrid smell of cannabis use forces us to close our windows and doors, for fear of how it is affecting us and our children--children who often are forced to walk or bike past drug abusers who loiter outside of these illegal pot businesses. Do not think for one moment that we believe that this 'legalization effort' is being done for our benefit. Holly Mitchell's nonsense about fostering 'Black entrepreneurship' and so-called 'social equity' in pushing for legalizing these dispensaries hides a more frightening and sinister truth of instead guaranteeing that a larger drug-addled Black populace is too mind-numbed to recognize or react to the inactivity and misdeeds of our government officials.

Our unincorporated communities have suffered enough and for far too long. We do not want more of these cannabis dispensaries and we demand that the County finally act to remove the illegal locations who continue to operate free from prosecution AND free for taxes here already. Do not add to the problem, as you habitually do: Do the job you are PAID TO DO WITH OUR TAX DOLLARS and help us rid our communities of these bad actors NOW.

Sincerely,

Daria Brooks
West Rancho Dominguez Community Group
[redacted]

CITY of CALABASAS

August 17, 2026

County of Los Angeles
Office of Cannabis Management
320 W. Temple Street, Room G-10
Los Angeles, CA 90012
Attn: Fernando Nieto

Re: Opposition to the Proposed Commercial Cannabis Regulatory Ordinance and Final Environmental Impact Report

Dear Chair Moon and members of the Regional Planning Commission:

On behalf of the City of Calabasas, I respectfully submit this letter expressing the City's opposition to the proposed Commercial Cannabis Regulatory Ordinance and the associated Final Environmental Impact Report (FEIR).

The City is particularly concerned that the proposed ordinance would permit commercial cannabis uses along Agoura Road, an unincorporated pocket that is adjacent to the City of Calabasas. Although the area lies outside the City's jurisdiction, land use decisions affecting Agoura Road have direct and substantial impacts on the surrounding Calabasas community. As proposed, the ordinance has the potential to introduce commercial cannabis activities that are fundamentally incompatible with the character of the surrounding neighborhood and inconsistent with the longstanding planning objectives of the City.

The City has consistently prohibited commercial cannabis businesses within its municipal boundaries in order to preserve neighborhood character, protect nearby residential areas, and maintain a balanced land use pattern. Allowing commercial cannabis operations immediately adjacent to the City's boundaries would effectively undermine these local policy decisions while creating impacts that would be experienced primarily by Calabasas residents and businesses.

Specifically, the City is concerned that permitting commercial cannabis uses along Agoura Road may result in:

- Increased traffic and vehicle trips on local streets serving the surrounding Calabasas community;
- Land use conflicts with adjacent residential neighborhoods and nearby commercial businesses;

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Calabasas, CA 91302
(818) 224-1600
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- Potential public safety concerns associated with security measures, cash-based transactions, and increased enforcement demands;
- Adverse effects on the community's character and the City's long-established vision for the area;
- Additional nuisance impacts, including odor, noise, lighting, and operational activities, depending on the type and intensity of the permitted cannabis use; and
- Reduced certainty for surrounding property owners regarding future land use compatibility.

While the FEIR evaluates environmental impacts on a programmatic level, the City remains concerned that it does not adequately address the localized effects of allowing commercial cannabis uses within an unincorporated enclave that is immediately adjacent to an incorporated city with policies expressly prohibiting such uses. The City's concerns extend beyond generalized environmental impacts and include the cumulative land use, community character, and public service implications uniquely associated with Agoura Road.

The City respectfully requests that the County revise the proposed ordinance to prohibit commercial cannabis businesses along Agoura Road. At a minimum, the County should establish a specific exclusion area or overlay that recognizes the unique relationship between Agoura Road and the surrounding City of Calabasas and preserves compatibility with the City's adopted land use policies.

If the County elects not to exclude Agoura Road from the ordinance, the City requests that additional site-specific analysis and mitigation measures be incorporated to address traffic, public safety, operational compatibility, odor control, security, buffering, and other impacts affecting the surrounding community.

The City appreciates the opportunity to comment on this important matter and requests that this letter be included in the administrative record for the proposed ordinance and Final Environmental Impact Report.

Sincerely,

Michael Klein
Director of Community Development, AICP, MPA
City of Calabasas