

3.13 PUBLIC SERVICES

This section provides an overview of fire protection, emergency medical, law enforcement, park/recreation, and other governmental services in Yolo County and a discussion of how adoption and implementation of the CLUO, including issuance of subsequent Cannabis Use Permits pursuant to the adopted CLUO would affect these services.

Several public services-related comments were received in response to the Notice of Preparation (NOP). These comments include public comments mentioning fire districts' ability to properly respond to a potential increase in fire risks associated with manufacturing processes. The Yocha Dehe Wintun Nation commented about whether the CLUO would positively or negatively affect illegal cannabis and the ability of police services to prevent robberies or other crimes associated with legal and illegal grows along with concerns as to how cannabis activities may affect recreation in the area. Residents of the County expressed concerns about District 5 not having a residential sheriff and the Madison Fire Department not being equipped to handle hazardous materials. These residents also expressed concern about neighbors not being safe from crime associated with cannabis operations. The Yolo County Farm Bureau sent in comments about potential crime related to cannabis and recommends the Sheriff's office review and approve cannabis operation security plans prior to approval. The environmental effects of these comments on public service are considered below. The reader is referred to Appendix A for comments on the NOP.

3.13.1 Environmental Setting

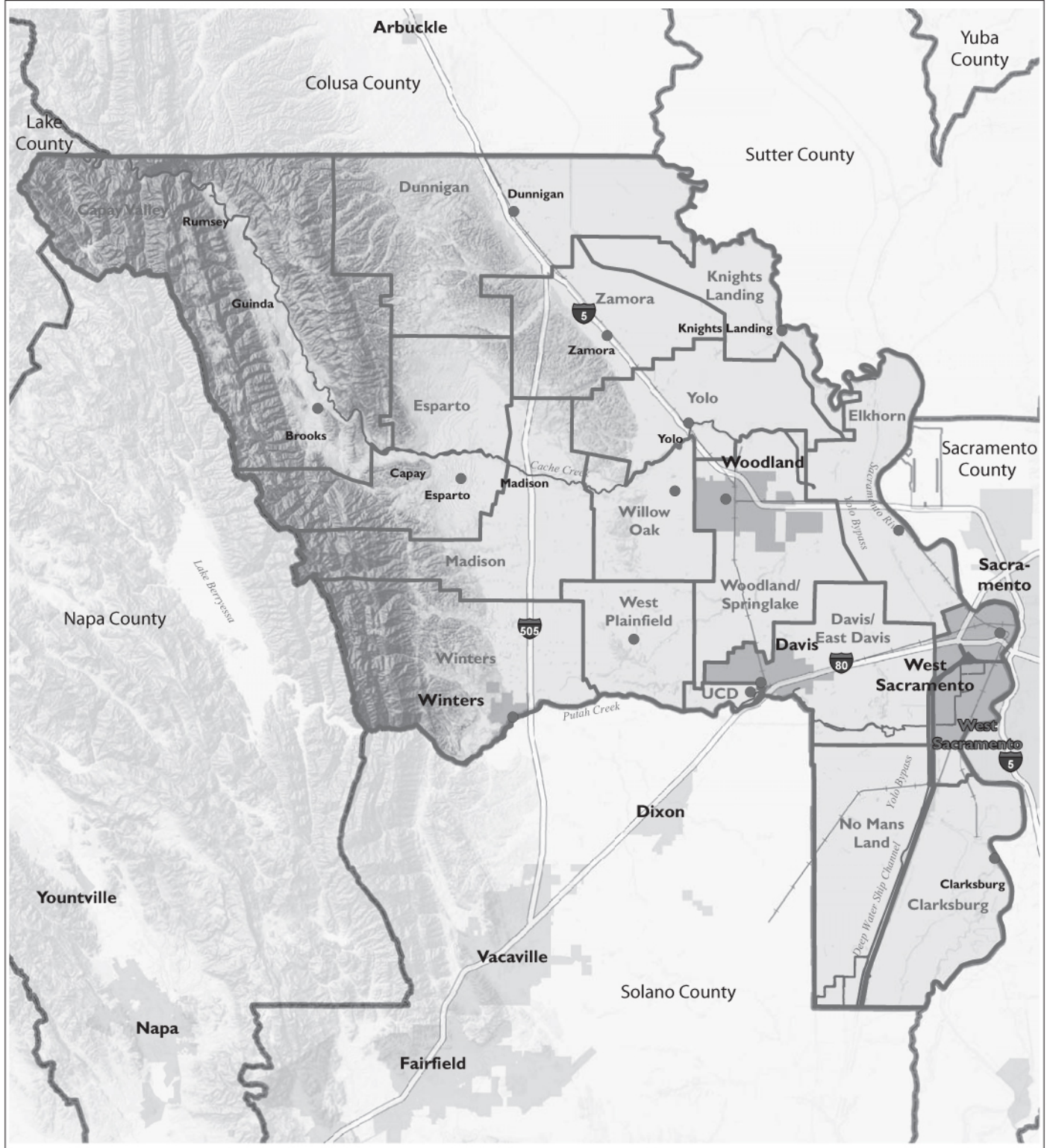
FIRE PROTECTION

CAL FIRE

Several state and local entities provide fire protection and emergency medical services (EMS) to Yolo County and its cities (Exhibit 3.13-1). At the state level, the California Department of Forestry and Fire Protection (CAL FIRE) is responsible for fire protection in State Responsibility Areas (SRAs), along with providing some fire protection in Local Responsibility Areas (LRAs). SRAs are areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. CAL FIRE provides a basic level of wildland fire prevention and protection services in SRAs. LRAs are areas where local agencies (cities, counties, community service districts, and fire protection districts [FPDs]) provide fire protection services. CAL FIRE is required by law to respond to and abate uncontrolled fires that threaten to destroy life, property, or natural resources outside of LRAs. The Yolo County SRA falls under the North Division of CAL FIRE's Sonoma-Lake-Napa Unit. CAL FIRE has staff and equipment available in Yolo County during fire season (typically May to October). Battalion 1419 operates three single-engine fire stations near Leesville, Wilbur Springs, and Brooks.

County Fire Protection Districts

There are 15 FPDs in Yolo County that provide fire protection and EMS within the unincorporated areas of the County. The FPDs provide either direct or indirect services. A direct-service provider provides fire and emergency medical services using volunteer or hired staff. An indirect-service provider contracts with a municipal FPD to provide these services (Yolo County 2019a). Table 3.13-1 identifies the FPDs in Yolo County, the FPDs that provide direct or indirect services, and the number of personnel with each FPD. Personnel information is not included for the FPDs that provide indirect services, since those services are provided via contract with another jurisdiction.



- Fire Department
- Fire Protection District Boundary

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Source: Image prepared and provided by LSA Associates

Exhibit 3.13-1

Fire Protection Districts



Table 3.13-1 Fire Protection Districts

Fire Protection District	Direct or Indirect (Contract Entity)	Personnel		
		Full Time	Part Time	Volunteer
Capay Valley FPD	Direct	0	0.5	14
Clarksburg FPD	Direct	0	0	25
Dunnigan FPD	Direct	1	0.25	24
East Davis FPD	Indirect (City of Davis)	0	0	0
Elkhorn FPD	Direct	0	0	6
Esparto FPD	Direct	1	0.25	18
Knights Landing FPD	Direct	0	0	13
Madison FPD	Direct	0	0	14
No Man's Land FPD	Indirect (City of Davis)	0	0	0
Springlake FPD	Indirect (Cities of Woodland & Davis)	0	0	0
West Plainfield FPD	Direct	2	0.5	7
Willow Oak FPD	Direct	4	0.25	3
Winters FPD	Indirect (City of Winters)	0	0	0
Yolo FPD	Direct	1	1	19
Zamora FPD	Direct	0	0	13

Source: Yolo County 2019a

All of the 11 FPDs that provide direct fire protection services have automatic aid agreements with one or more of their neighboring fire districts. In addition, for the four indirect-service FPDs, the municipal fire departments with which the FPDs have contracts have automatic aid agreements with neighboring municipal fire departments (LAFCO 2016). Under these agreements, the parties of the agreements are automatically dispatched to assist one another in responding to emergencies within each other's jurisdictions. This type of mutual aid agreement is typically utilized on a day-to-day basis.

Table 3.13-2 identifies the fire jurisdictions with which the FPDs have automatic aid agreements. Since automatic aid agreements are with adjacent fire districts, some agreements are with fire entities outside of Yolo County.

In addition, the Yolo County Fire Chief's Association has a "No Response by Agency" policy that requires the dispatch and notification of the next closest FPD if an associated aid FPD does not respond within 1 minute.

All of the 11 direct-service FPDs and the contracted city fire departments for the four indirect-service FPDs are signatories to the 2007 Yolo County Mutual Aid Agreement. Under this agreement, the fire jurisdictions provide assistance across jurisdictional boundaries, upon request, when an emergency exceeds a jurisdiction's resources.

In 2016, the Yolo Local Agency Formation Commission (LAFCO) adopted the *Municipal Services Review and Sphere of Influence Study* for the 15 FPDs in Yolo County (LAFCO 2016). This report analyzed, among other things, the service capacity and adequacy of the 15 FPDs by evaluating compliance with the National Fire Protection Association (NFPA) Deployment Standard for Volunteer Fire Departments Standard 1720. The NFPA is an internationally recognized organization devoted to eliminating death, injury, property, and economic loss from fire, electrical, and other hazards. This is accomplished through the development of codes and standards designed to minimize the risk and effects of fire by establishing criteria for building, processing, design, service, and installation around the world.

Table 3.13-2 Automatic Aid Agreement Jurisdictions

Fire Protection District	Automatic Aid Agreement Jurisdictions
Capay Valley	Esparto, Yocha Dehe
Clarksburg	City of West Sacramento, Courtland
Dunnigan	Capay Valley and California Department of Forestry and Fire Protection
East Davis (City of Davis)	City of Davis; University of California, Davis; City of Woodland; City of West Sacramento; City of Dixon
Elkhorn	City of West Sacramento, Woodland
Esparto	Madison, Yocha Dehe
Knights Landing	Yolo, Sutter Basin
Madison	Yocha Dehe, Esparto
No Man's Land (City of Davis)	Davis; University of California, Davis; City of Woodland; City of West Sacramento; City of Dixon
Springlake (Cities of Davis and Woodland)	City of Davis; University of California, Davis; City of Woodland; City of West Sacramento; City of Dixon; and Elkhorn
West Plainfield	City of Davis, City of Winters
Willow Oak	City of Woodland
Winters (City of Winters)	West Plainfield, City of Dixon, City of Vacaville
Yolo	Knights Landing, Zamora, Willow Oak
Zamora	Yolo
Source: LAFCO 2016	

NFPA Standard 1720 was utilized in the LAFCO study as the best practice criteria for evaluating fire service deployment in Yolo County (LAFCO 2016). The LAFCO study found that the “response times for all 15 FPDs meet nationally recognized best practice criteria for rural service demand zones of 14 minutes or less with 80 percent or better reliability.”

The LAFCO study noted that of the FPDs aggregate inventory of 72 fire apparatus/vehicles, 53 percent are over 15 years of age, 36 percent are over 20 years of age, and 29 percent are over 25 years of age. All of the districts have one or more fire apparatus over 20 years of age. The report recommended that the FPD consider replacing fire apparatus after not more than 25 years of service life.

Table 3.13-3 provides an equipment list for the 15 FPDs and their response times.

Table 3.13-3 Fire Protection District Equipment and Response Times

Fire Protection District	Stations	Equipment	Response Time (minutes)
Capay Valley FPD	3	4 engines, and 2 water tenders	11
Clarksburg FPD	1	3 engines, 1 squad vehicle, and 1 water tender	10
Dunnigan FPD	1	4 engines, 1 squad vehicle, 1 water tender,	8
East Davis FPD (served by the City of Davis)	3	3 engines, 1 rescue vehicle, 1 squad vehicle, 2 grass/wildland units, 1 water tender, 2 reserve engines, 3 command vehicles, 2 fire prevention staff vehicles, and 2 antique fire apparatus	N/A**
Elkhorn FPD	1	2 engines, 1 squad vehicle, 1 utility vehicle, and 1 water tender	11
Esparto FPD	1	3 engines, 1 squad vehicle, 1 command vehicle, 2 water tenders, and 1 utility vehicle	4
Knights Landing FPD	1	3 engines, 1 squad vehicle, 1 water tender	10

Table 3.13-3 Fire Protection District Equipment and Response Times

Fire Protection District	Stations	Equipment	Response Time (minutes)
Madison FPD	1	3 engines, 2 water tenders, 1 utility vehicle, and 1 command vehicle	9
No Man's Land FPD (served by the City of Davis)	3	3 engines, 1 rescue vehicle, 1 squad vehicle, 2 grass/wildland units, 1 water tender, 2 reserve engines, 3 command vehicles, 2 fire prevention staff vehicles, and 2 antique fire apparatus	N/A**
Springlake FPD (served by the Cities of Woodland and Davis)	6*	City of Davis: 3 engines, 1 rescue vehicle, 1 squad vehicle, 2 grass/wildland units, 1 water tender, 2 reserve engines, 3 command vehicles, 2 fire prevention staff vehicles, and 2 antique fire apparatus City of Woodland: 3 fire engines and 1 ladder truck	9
West Plainfield FPD	1	4 engines and 2 water tenders	8
Willow Oak FPD	2	4 engines, 2 command vehicles, and 2 water tenders	7
Winters FPD (City of Winters)		5 engines, 1 squad vehicle, 3 water tenders, and 2 utility vehicles	7
Yolo FPD	1	3 engines, 1 squad vehicle, 1 water tender, and 1 command vehicle	7
Zamora FPD	1	2 engines, 1 squad vehicle, and 1 water tender	12

Notes:

* The Cities of Davis and Woodland each have three fire stations.

** Response time data were not provided for the LAFCO report. However, LAFCO conducted a response routes analysis from Davis Station #3, the results of which suggests that 80th percentile response times would be well within the recommended 14 minutes or less as recommended by NFPA Standard 1720 for both the East Davis and No Man's Land FPDs.

Sources: Burns 2019, City of Davis 2019, and LAFCO 2016

City of Davis

The Davis Fire Department provides emergency response and fire prevention services to the city of Davis and service to three FPDs (East Davis County District, Springlake, and "No Man's Land"). It has three fire stations and 36 shift personnel, including nine captains and 27 firefighters. The City of Davis and University of California, Davis (UC Davis) have a shared management team for the fire chief, deputy chief, and three division chiefs. In 2018, the DFD responded to 5,447 calls (City of Davis 2019).

City of West Sacramento

The West Sacramento Fire Department (WSFD) provides fire protection services to the city of West Sacramento and the unincorporated area south of the city boundary to Babel Slough Road and across to the old Arcade Station on Jefferson Boulevard. It has five stations with a combined staffing of 17 personnel on duty. The WSFD had an average response time of 4 minutes and 15 seconds in 2016 and strives to remain within a 4- to 6-minute response time window (City of West Sacramento 2016a).

City of Winters

The Winters Fire Department covers 86 square miles that make up the city of Winters and the Winters District. Six career and 50 volunteer personnel provide service from the Winters Fire Station located at 700 Main Street in Winters.

City of Woodland

The Woodland Fire Department provides fire protection services for the city of Woodland and the surrounding unincorporated areas (e.g., North Woodland, East Woodland and Speckles). It has a daily staffing of 13 firefighters per day deployed on three fire engines, and one ladder truck. Three engine companies operate with three fire personnel and one truck company operates with four fire personnel (City of Woodland 2019). There are three fire stations located throughout the city.

UC Davis

The UC Davis Fire Department maintains a station that serves the campus and has shared responsibility with the City of Davis. The department employs 25 full-time personnel, one part-time administrative assistant, 15 student resident firefighters, and two student administrative support staff. Two captains, two engineers, and three firefighters are working per shift (U.S. Fish and Wildlife Service and Yolo Habitat Conservancy 2017).

Yocha Dehe

The Yocha Dehe Fire Department, maintained by the Yocha Dehe Wintun Nation, provides fire protection, rescue, and EMS for the Cache Creek Casino Resort and tribal housing. The department runs one station with 14 firefighter/paramedics, six engineers, six captains, and three battalion chiefs (U.S. Fish and Wildlife Service and Yolo Habitat Conservancy 2017).

Hazardous Materials Emergency Response

If a hazardous materials incident is beyond the capabilities of a fire protection district, the Yolo County Multi-Agency Hazardous Materials Response Team is activated. This team combines the resources of the Yolo County Environmental Health Division, the Cities of Woodland, Davis, and West Sacramento Fire Departments, and UC Davis Fire Department. The County and the fire departments participate in a system of joint hazardous material response and automatic aid throughout Yolo County. The *“Agreement for Hazardous Materials Automatic Aid”* became effective June 27, 1995, and provides for HazMat Team response in all cities and in the unincorporated portion of the County. As identified in the Yolo Operational Area Hazardous Materials Emergency Response Plan, the agreement addresses the responsibilities of team members, resources, funding, training and reimbursement. (Please refer to Section 3.9 Hazards and Hazardous Materials for further information regarding hazardous materials emergency response.)

Fire Response to Existing Cannabis Activities

There were five calls for fire department response at County licensed cannabis sites in 2018. Four were for fire response and one was for emergency medical services. The number and type of responses is not unusual and within the response capabilities of the FPDs (Burns, pers. comm., 2019).

EMERGENCY MEDICAL SERVICES

Emergency medical services in the County are provided by the FPDs and municipal fire departments. If 911 is called, the initial assessment of whether emergency medical assistance is required (vs. other emergency services) is made by the Yolo County 911 Dispatch Center operated by the Yolo Emergency Communications Agency.

LAW ENFORCEMENT

California Highway Patrol

The California Highway Patrol (CHP) provides uniform traffic law enforcement throughout the state. The primary purpose of the CHP is to ensure safe, convenient, and efficient transportation of people and goods on the highway system. There is one CHP office in Yolo County, located in the city of Woodland (CHP 2018).

California State Park Peace Officers

California State Park Peace Officers, or Rangers, carry out law enforcement and visitor service functions in State Parks. State Park officers have full peace officer powers pursuant to Penal Code Section 830.2, and perform a full range of peace officer duties and responsibilities. Duties include patrol, issuing citations, writing reports, physical arrests, conducting investigations, and providing emergency medical aid (CSP 2017). California State Parks in Yolo County include the Woodland Opera House State Historic Park, located in Woodland (CSP 2018).

Yolo County Sheriff's Office

Law enforcement in the unincorporated areas of the County is provided by the Yolo County Sheriff's Office. The Sheriff's Office is responsible for patrolling the County, administering the County jail and work program, providing security to the Yolo County Court system, providing animal services, and serving as the County coroner. Sheriff headquarters is located in Woodland with the capability of serving the County area through the 300 full and part time employees (Yolo County 2019c). The Sheriff's Office has two resident deputies in Clarksburg. In addition, in September 2019, the County Board of Supervisors approved the addition of a resident Sheriff's Office deputy for the Capay Valley, including Esparto and Madison. The Sheriff's Office also provides dedicated 24-hour patrol within Capay Valley. Lastly, the County has two Sheriff's Office detectives dedicated to the County's Cannabis Task Force. The Yolo County 2030 General Plan provides an average response time goal of 12 minutes for the Sheriff's Office in rural areas.

Additionally, each incorporated city in Yolo County has its own police department (discussed below).

Sheriff's Office Response to Existing Cannabis Activities

The Sheriff's Office and Cannabis Task Force have received calls regarding illegal cultivation sites and thefts on licensed cannabis cultivation sites. A summary of the number of illegal cannabis abatements and thefts at licensed cultivation sites in 2018 are listed below.

Table 3.13-4 Cannabis-Related Crime

	Illegal Cannabis Abatements	Theft at Licensed Cultivation Site
2018	12	9

For licensed cannabis sites that experienced a theft in 2018, the licensee was required to submit a plan for a fully functioning security plan that included following requirements:

- Cameras must be fully functional 24 hours a day, 7 days a week, and focused in the direction of cultivation activity and storage locations/vehicles.
- Lighting must be installed in area(s) being captured by video viewpoints to enhance picture clarity, especially in low light or complete darkness.
- Cameras need to be installed out of arm's reach of persons on-site.
- Routine maintenance of the cameras must be conducted and any obstructions interfering with obtaining a clear picture/video cleared.
- Camera recordings must be maintained for a period of not less than 30 days.
- Gates and doors to cultivation activity and storage need to remain locked to prevent unauthorized entry.
- Fence surrounding cultivation activity and storage needs to be fully enclosed, routinely maintained for structural integrity and adequately secured.

Each plan was approved by the Sheriff's Office and Cannabis Task Force prior to implementation. In addition, post installation inspections were conducted by the Sheriff's Office and Cannabis Task Force to confirm the security measures were in place and functioning properly. The security measures are then inspected as part of the monthly routine inspections conducted at the cultivation sites.

The County currently conducts background checks on licensees and property owners. It is anticipated that in the future, the background checks will be expanded to also include employees.

City Police

The City of Davis Police Department is headquartered at 2600 5th Street, Davis and employs 61 sworn officers, 37 civilian support professionals, one canine, and over 60 volunteers. There are four divisions in the department; administration, patrol, investigations, and records & communications (City of Davis 2014).

The City of West Sacramento Police Department is staffed with 74 sworn officers and 23 civilian full-time employees. The department is organizationally divided into three offices: Administration, Support Services, and Field Operations. There is one main police station on Jefferson Boulevard and one service center on Lake Washington Boulevard (City of West Sacramento 2015).

The Winters Police Department provides police protection to the entire city with headquarters located at 702 Main Street. It is staffed with 11 sworn positions, consisting of a chief, three sergeants, two corporals, one detective and four patrol officers (City of Winters 2019).

The City of Woodland Police Department has one station at 1000 Lincoln Avenue with 64 sworn officers and 15 support employees. The department has four divisions: Administration, Operations, Support Services, and Special Operations. The Special Operations Division houses the Investigations and Gang Suppression Units, which include gang suppression, Yolo County Narcotics Enforcement Team, and School Resource Officers (City of Woodland 2017).

UC Davis has its own police department. Patrol operations on the campus is managed by a patrol lieutenant and patrol teams (U.S. Fish and Wildlife Service and Yolo Habitat Conservancy 2017).

County Code Enforcement

The County has a Cannabis Task Force to address licensing and compliance for existing cultivators in the County. The task force, which is located within the Community Services Department, is made up of a program manager, staff supervisor, three enforcement officers, and two sheriff detectives. The task force issues annual cultivation licenses and enforces compliance with the County's cannabis interim ordinance through monthly site inspections and compliance with a track and trace system. The track and trace system records plant inventory at each site and movement through the commercial cannabis supply chain. The task force would be charged with ensuring compliance with the CLUO. Non-compliance with the provisions of the cannabis interim ordinance can lead to the issuance of Notices of Violations, penalties, revocation, and/or denial of licenses.

There is also a code enforcement unit within the Building Inspection Services Division of the Community Services Department. The code enforcement officers are charged with the enforcement of Yolo County Codes as adopted by the Board of Supervisors and the laws of the State of California.

Code Enforcement is a citizen-based program that inspects and investigates complaints from Yolo County citizens or within a mutual-aid capacity with other county, city, or regulatory agencies. As development occurs within Yolo County, it becomes the County's responsibility to work within its neighborhoods and communities through zoning, planning and building regulations. These codes encompass all public and private properties and help Yolo County citizens maintain a standard in the community for all to enjoy. Additionally, the Yolo County Codes address the public's desire to live, and work, in diverse, attractive and well-managed communities, demanding more creative strategies to enforce proper and effective, land use regulations.

Compliance is encouraged through various methods; communication, cooperation and coordination. Occasionally, officials must take measures beyond inspection; these include the issuance of Administrative Citations and Notice of Violation recordation (Yolo County 2018).

EXISTING RECREATION AREAS AND OPEN SPACES

Parks and open space within Yolo County include city and County parks, regional parks, and open space areas managed by federal, state, and local agencies, non-governmental organizations, commercial mitigation banks, and other private interests. The State of California owns approximately 17,460 acres within the County, including the Yolo Bypass Wildlife Area and the Fremont Weir Wildlife Area.

The Yolo Bypass Wildlife Area encompasses approximately 16,600 acres of managed wildlife habitat and agricultural land located within the southern floodway of the Yolo Bypass. The Wildlife Area is a public and private restoration project managed by the California Department of Fish and Wildlife. The Yolo Basin Foundation is responsible for environmental education programs associated with the Yolo Bypass Wildlife Area. These programs occur both within the Wildlife Area and a short distance to the west at the Wildlife Area Headquarters, which includes walking trails, picnic tables, and other recreational amenities open for daily public use.

The Fremont Weir Wildlife Area is located primarily in the northeastern part of the County. This area is a floodway consisting of approximately 1,500 acres and is typically used for fishing, bird watching, wildlife viewing, and hunting. No facilities are located in the wildlife area.

Yolo County manages over 2,000 acres of regional and community parks and open space areas. The term “resource” park is used to refer to regional and/or open space parkland, which is typically much larger in size than a community park, and is characterized by passive and/or very low-management uses. “Resource” parks are intended to serve the County population and outside visitors, rather than a singular community. Community parks are generally small in area and are developed for a variety of community uses, gatherings, and events. These parks are intended to provide active recreation areas, such as playgrounds, sports fields, sports courts, and picnic areas. A list of County parks and open space areas and their acreage is shown below in Table 3.13-5.

Table 3.13-5 Existing County Parks and Open Space Areas

Park	Acreage
Dunnigan Community Park	0.5
Esparto Community Park	1
Cache Creek Canyon Regional Park, Trail System, and Campground	685
Cache Creek Conservancy Nature Preserve	119
Camp Haswell Park	7
Capay Open Space Park and Trail System	41
Clarksburg River Access Park	4
Correll-Rodgers Habitat Area	40
Elkhorn Regional Park	49
Gibson House Museum	2
Grasslands Regional Park and Trail System	320
Helvetia Oak Grove	11
Knights Landing River Access Park	4
Millsap Property	17
Nichols Park	21
Valley Vista Regional Park	587
Putah Creek Fishing Access	87

Table 3.13-5 Existing County Parks and Open Space Areas

Tuli Mem Park	9
Wild Wings Park	17
Total Acreage	2,025.5

Source: Compiled by Ascent Environmental in 2019

PLANNED RECREATION AREAS AND OPEN SPACE

Yolo County has several planned recreation and open space areas, as described in the Yolo County General Plan (Yolo County 2009a) and city general plans (City of Davis 2007; City of West Sacramento 2016b; City of Winters 1992; City of Woodland 2002). Planned features include the following:

- Woodland Regional Park;
- Capay Valley Bicycle Trail;
- gateway park in the Western Foothills;
- Blue Ridge Trail;
- trail linking Putah Creek access sites;
- trail linkages along Putah Creek between existing access sites in Winters and Davis;
- extension of existing bicycle trail along Putah Creek corridor;
- gateway park to Yolo Bypass;
- trail linkages along the Sacramento River between Knights Landing and Clarksburg;
- gateway park in the Delta region;
- new California Indian Heritage Center;
- expanded Sacramento River access and trail linkage;
- Dunnigan Hills Area Park;
- new community park in Knights Landing;
- new community park in Dunnigan;
- trail linking Cache Creek access sites;
- expansion of Cache Creek Regional Park;
- additional parks and trail linkages along Cache Creek corridor;
- Cache Creek Parkway;
- extension of existing bicycle trail west of Davis;
- new and expansion of existing neighborhood, miniparks, and community parks in Davis; and
- ongoing acquisitions by City of Davis Open Space and Habitat Commission.

OTHER PUBLIC SERVICES

Additional public services include schools, libraries, and social services. These services are not likely to be affected by the CLUO but will be briefly discussed here.

Schools

Yolo County is serviced by seven school districts that run a total of 82 schools. These school districts include the Davis Joint School District, Esparto Unified School District, Pierce Joint Unified School District, River Delta Joint Unified School District, Washington Unified School District, Winters Joint Unified School District, and Woodland Joint Unified School District. There are a variety of parochial and other private schools in Yolo County, primarily within the incorporated cities.

The Davis Joint School District has total enrollment of 8,587 students across 10 elementary schools, five junior high schools, four high schools, one adult and community education, and one preschool (CDE 2019a; DJUSD 2019). The Davis Joint School District has relatively stable enrollment numbers and does not have capacity issues. The Esparto Unified School District has a total enrollment of 941 students across one

elementary school, one middle school, and two high schools (CDE 2019b; EUSD 2019). In previous years, this district had struggles accommodating the students. However, there has been a decline in enrollment numbers creating additional space for students.

Pierce Joint Unified School District has 1,479 students with two elementary schools, one junior high school, and one high school (CDE 2019c; PJUSD 2019). This district does not have capacity issues and can accommodate additional students. The River Delta Joint Unified School District has 2,354 students with four elementary schools, two middle schools, and four high schools (CDE 2019d; River Delta USD 2019). The River Delta Joint Unified School District has relatively stable enrollment numbers and does not have capacity issues.

Washington Unified School District has 8,322 students with seven elementary schools and one high school (CDE 2019e; WUSD 2019). This district does not have capacity issues. The Winters Joint Unified School District has 1,541 students across three elementary schools, one middle school, and one high school (CDE 2019f; WJUSD 2019). Due to the relatively stable enrollment numbers, the district is not experiencing capacity issues. Woodland Joint Unified School District has 10,031 students with 12 elementary schools, two middle schools, and four high schools (CDE 2019g; Woodland JUSD 2019). This district is not experiencing capacity issues due to the stable enrollment numbers.

Libraries

The library system in Yolo County provides library services in all incorporated cities and throughout the County. There are seven branch libraries along with administrative and technical services departments located in Winters, Davis, Sacramento, Clarksburg, Woodland, Knights Landing, and Esparto. Property taxes, state funds, library fines and fees, and donations fund the library system. All communities and cities in Yolo County are part of the library system, except for the City of Woodland. The City of Woodland has the library administrative center and the County archives.

Social Services

The County provides a variety of general government service functions that improve quality of life for County residents. These services include health, elections, education, child support, and administration of County operations.

3.13.2 Regulatory Setting

FEDERAL

No federal laws, regulations, or programs were identified related to public services and the CLUO. Several federal agencies have jurisdiction over law enforcement and fire protection on federal lands in California, related to unpermitted cultivation operations. The U.S. Forest Service responds to fires in National Forests as well as to fires on other lands in support of other federal, state, and local agencies (USFS 2017). Because cannabis use and cultivation remains illegal under federal law, several federal agencies investigate and prosecute cannabis use, cultivation, and distribution on federally managed lands. Federal agencies involved in law enforcement in California include the U.S. Forest Service, whose Law Enforcement and Investigations division conducts law enforcement operations on federal lands, including eradication of unpermitted cannabis cultivation on National Forest lands. Both the U.S. Bureau of Land Management and the National Park Service law enforcement programs target cannabis cultivation on federally managed lands.

In addition to law enforcement on federal lands, there are federal agencies that investigate and prosecute cannabis business activities, which is currently considered illegal at the federal level. The Federal Bureau of Investigation, as the nation's foremost law enforcement agency, also works in California to investigate federal crimes and crimes that occur across state lines, including drug trafficking. The U.S. Drug Enforcement Administration enforces federal controlled substances laws and regulations, including enforcement activities related to cannabis.

STATE

Mitigation Fee Act

Government Code Section 66000 through 66025 (commonly referred to as AB 1600 requirements) allows local agencies to enact a development impact fee in connection with approval of a development project for the purpose of defraying all or a portion of the cost of public facilities related to the development project. A development impact fee is not a tax or special assessment and must be reasonably related to the cost of the service provided by the local agency. Local agencies use development impact fees under this provision for facilities and equipment such as vehicles, fire and law enforcement stations, and equipment necessary to provide services to development.

California Health and Safety Code

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code. This includes regulations for building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, and fire suppression training.

California Division of Occupational Safety and Health

In accordance with CCR, Title 8 Section 1270, "Fire Prevention," and Section 6773, "Fire Protection and Fire Equipment," the California Division of Occupational Safety and Health (referred to as Cal/OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance and use of all firefighting and emergency medical equipment.

California Building Standards Code

The California Building Standards Code, Title 24 of the California Code of Regulations, serves as the basis for the design and construction of buildings in California. The California Building Code (Title 24, Part 2) covers all aspects of building design and required safety features for all 1 types of buildings, including fire protection systems, fire and smoke protection features, means of egress, and structural design and materials. Title 24, Part 3 is the Electrical Code, which contains standards for electrical systems, including safety features such as overcurrent protection, surge arresters, and proper wiring methods.

California Fire Code

The California Fire Code is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The California Fire Code establishes minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings. The California Fire Code also contains requirements related to emergency planning and preparedness, fire service features, building services and systems, fire resistance-rated construction, fire protection systems, and construction requirements for existing buildings, as well as specialized standards for specific types of facilities and materials. Structures used for indoor cultivation of cannabis and cannabis-supportive uses (e.g., manufacturing, distribution, processing, microbusinesses, and retail nurseries) would be subject to applicable sections of the California Fire Code.

Public Resources Code Section 4291

PRC Section 4291 requires a person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material to maintain defensible space of 100 feet from each side and from the front and rear of the structure. The amount of fuel modification necessary shall take into account the flammability of the structure as affected by building material, building standards, location, and type of vegetation. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure.

California Building Code

CCR Title 24, Part 2, Section 701A.3.2 (New Buildings Located in Any Fire Hazard Severity Zone) requires that new buildings located in any Fire Hazard Severity Zone within SRAs, any local agency Very-High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted shall comply with all the requirements of Chapter 7A, including the following requirements:

- roofing design must be fire resistant and constructed to prevent the intrusion of flames and embers (Section 704A.1),
- attic ventilation must be designed to be resistant to the intrusion of flames and embers into the attic area of the structure (Section 704A.2),
- exterior walls (including vents, windows, and doors) must be designed with noncombustible or ignition-resistant material and resist the intrusion of flame and ember (Section 704A.3),
- decking must be designed with ignition-resistant material (Section 704A.4), and
- ancillary buildings and structures must comply with the above provisions (Section 704A.5).

Public School Development Impact Fees

Government Code Section 65995 establishes the dollar amount school districts may impose on new development; however, this may not be sufficient to fund all required facilities. Funding from state grants is possible but other sources would most likely still be required. Sources include but are not limited to Proposition 51 (2016 Public School Facility Bonds) funds, increased developer and local tax fees, and the local general obligation bond funds. New public school facilities proposed by school districts must undergo site-specific CEQA and California Board of Education evaluation before construction to identify and lessen environment-related impacts.

California Government Code Sections 65995(h) and 65996(b) require full and complete school facilities mitigation. Section 65995(h) states that the payment or satisfaction of a fee, charge, or other requirement levied or imposed pursuant to Section 17620 of the Education Code is deemed to be full and complete mitigation of the impacts for the planning, use, development, or the provision of adequate school facilities and Section 65996(b) states that the provisions of the Government Code provide full and complete school facilities mitigation.

Emergency Response/Evacuation Plans

The State of California passed legislation authorizing the Office of Emergency Services to prepare a Standard Emergency Management System (SEMS) program, which sets forth measures by which a jurisdiction should handle emergency disasters. Noncompliance with SEMS could result in the state withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. The preservation of life, property and the environment is an inherent responsibility of local, state, and federal government.

Cannabis Licensing Agencies

There are three state licensing agencies that regulate the commercial cannabis market:

- Bureau of Cannabis Control, housed within the Department of Consumer Affairs, which licenses testing labs, distributors, retail, and microbusinesses;
- CalCannabis Cultivation Licensing (CalCannabis), housed within the Department of Food and Agriculture, which licenses cannabis cultivators, nurseries, and processors; and
- Manufactured Cannabis Safety Branch, housed within the Department of Public Health, which licenses manufacturers of cannabis products, including edibles.

Regulations associated with public services are described below.

CalCannabis Licensing

- CCR Section 8102(aa): An attestation that the local fire department has been notified of the cultivation site if the application is for an indoor license type.
- CCR Section 8109: Licensees shall notify the department and law enforcement authorities within three (3) calendar days of discovery of any diversion, theft, loss of, or criminal activity related to licensee's cannabis or nonmanufactured cannabis products.

Bureau of Cannabis Control Licensing

- CCR Section 5501(i): An attestation that the local fire department has been notified of the cultivation site if the application is for an indoor license type.
- CCR Section 5036(a): A licensee shall notify the Bureau and local law enforcement within 24 hours of discovery of any of the following situations:
 - (1) The licensee discovers a significant discrepancy, as defined in section 5034 of this division, in its inventory.
 - (2) The licensee discovers diversion, theft, loss, or any other criminal activity pertaining to the operations of the licensee.
 - (3) The licensee discovers diversion, theft, loss, or any other criminal activity by an agent or employee of the licensee pertaining to the operations of the licensee.
 - (4) The licensee discovers loss or unauthorized alteration of records related to cannabis goods, customers, or the licensee's employees or agents.
 - (5) The licensee discovers any other breach of security.
- CCR Section 5036(b): The notification to the Bureau pursuant to subsection (a) of this section shall be submitted on the Notification and Request Form, BCC-LIC-027 (New 10/18), which is incorporated herein by reference, and shall include the date and time of occurrence of the theft, loss, or criminal activity, the name of the local law enforcement agency that was notified, and a description of the incident including, where applicable, the item(s) that were taken or lost.
- CCR Section 5418(h): Immediately upon request by the Bureau or any law enforcement officer, the licensed retailer's delivery driver shall provide:
 - (1) All delivery inventory ledgers from the time the licensed retailer's delivery driver left the licensed premises up to the time of the request;
 - (2) All delivery request receipts for cannabis goods carried by the driver, in the delivery vehicle, or any deliveries that have already been made to customers; and
 - (3) The log of all stops from the time the licensed retailer's delivery driver left the licensed premises up to the time of the request.
- CCR Section 5424(d): If a licensed retailer identifies any evidence of theft, diversion, or loss, the licensed retailer shall notify the Bureau and law enforcement.
- CCR Section 5424(e): If a significant discrepancy as defined in section 5034 of this division is discovered between a licensed retailer's physical inventory and the licensed retailer's inventory records, the licensed retailer shall notify the Bureau and law enforcement.

- CCR Section 5042: Limited Access Areas:

- (a) Licensees shall ensure that only employees of the licensee and other authorized individuals access the limited-access areas of the licensed premises.
- (b) For the purpose of this section, authorized individuals include outside vendors, contractors, or other individuals conducting business that requires access to the limited-access areas.
- (c) An individual who enters the limited-access area and is not employed by the licensee shall be escorted by an employee of the licensee at all times while within the limited-access area.
- (d) A licensee shall maintain a record of all authorized individuals who are not employees of the licensee who enter the limited-access areas. The record shall include the name of the individual, the company the individual works for, the reason the individual entered the limited-access area, the date, and the times the individual entered and exited the limited-access area. These records shall be made available to the Bureau immediately upon request.
- (e) A licensee shall not receive consideration or compensation for permitting an individual to enter the limited-access areas.
- (f) Entrances to all limited-access areas shall have a solid door and a lock meeting the requirements of section 5046 of this division. The door shall remain closed when not in use during regular business hours.

- CCR Section 4053: License Employee Badge Requirement:

All agents, officers, or other persons acting for or employed by a licensee shall display a laminated or plastic-coated identification badge issued by the licensee at all times while engaging in commercial cannabis activity. The identification badge shall, at a minimum, include the licensee's "doing business as" name and license number, the employee's first name, an employee number exclusively assigned to that employee for identification purposes, and a color photograph of the employee that clearly shows the full front of the employee's face and that is at least 1 inch in width and 1.5 inches in height.

- CCR Section 5044: Video Surveillance System:

- (a) Each licensed premises shall have a digital video surveillance system with a minimum camera resolution of 1280 × 720 pixels.
- (b) The video surveillance system shall at all times be able to effectively and clearly record images of the area under surveillance.
- (c) Each camera shall be permanently mounted and in a fixed location. Each camera shall be placed in a location that allows the camera to clearly record activity occurring within 20 feet of all points of entry and exit on the licensed premises, and allows for the clear and certain identification of any person and activities in all areas required to be filmed under subsection (d) of this section.
- (d) Areas that shall be recorded on the video surveillance system include the following:
 - (1) Areas where cannabis goods are weighed, packed, stored, loaded, and unloaded for transportation, prepared, or moved within the licensed premises;
 - (2) Limited-access areas;
 - (3) Security rooms;

- (4) Areas storing a surveillance-system storage device with at least one camera recording the access points to the secured surveillance recording area; and
- (5) Entrances and exits to the licensed premises, which shall be recorded from both indoor and outdoor vantage points.
- (e) Licensed retailers and licensed microbusinesses authorized to engage in retail sales shall also record point-of-sale areas and areas where cannabis goods are displayed for sale on the video surveillance system. At each point-of-sale location, camera placement must allow for the recording of the facial features of any person purchasing or selling cannabis goods, or any person in the retail area, with sufficient clarity to determine identity.
- (f) Cameras shall record continuously 24 hours per day and at a minimum of 15 frames per second (FPS).
- (g) The physical media or storage device on which surveillance recordings are stored shall be secured in a manner to protect the recording from tampering or theft.
- (h) Surveillance recordings shall be kept for a minimum of 90 calendar days.
- (i) Surveillance recordings are subject to inspection by the Bureau, and shall be kept in a manner that allows the Bureau to view and obtain copies of the recordings at the licensed premises immediately upon request. The licensee shall also send or otherwise provide copies of the recordings to the Bureau upon request within the time specified by the Bureau.
- (j) Recorded images shall clearly and accurately display the time and date. Time is to be measured in accordance with the standards issued by the United States National Institute of Standards and Technology.
- (k) The video surveillance system shall be equipped with a failure notification system that provides notification to the licensee of any interruption or failure of the video surveillance system or video surveillance-system storage device.
- (l) If multiple licensed premises are contained within the same building, a single video surveillance system covering the entire building may be used by all of the licensees under the following conditions:
 - (1) Each applicant or licensee shall disclose on their premises diagram where the surveillance recordings are stored.
 - (2) Each applicant or licensee shall include in their security operating procedures, submitted with the application pursuant to section 5002(c)(29)(D) of this division, an explanation of how the video surveillance system will be shared, including who is responsible for monitoring the video footage and storing any video recordings.
 - (3) All licensees shall have immediate access to the surveillance recordings to produce them pursuant to subsection (i) of this section.
 - (4) All licensees shall be held responsible and subject to discipline for any violations of the video surveillance requirements.
- CCR Section 5045: Security Personnel:
 - (a) A licensed retailer or licensed microbusiness authorized to engage in retail sales shall hire or contract for security personnel who are at least 21 years of age to provide on-site security services for the licensed retail premises during the hours of operation. All security personnel hired or

contracted for by the licensee shall be licensed by the Bureau of Security and Investigative Services and shall comply with Chapters 11.4 and 11.5 of Division 3 of the Business and Professions Code.

- (b) Notwithstanding subsection (a) of this section, a licensed non-storefront retailer or licensed microbusiness who is not engaged in storefront retail sale is not required to hire or contract for security personnel. (c) If multiple licensed premises are contained within the same building, security personnel may be shared by all of the licensees to cover the entire building under the following conditions:

(1) Each licensee shall include in their security operating procedures, submitted with the application pursuant to section 5002(c)(29)(D) of this division, an explanation of how security personnel will be shared, including who is responsible for employing or contracting the security personnel.

(2) All licensees shall be held responsible and subject to discipline for any violations of the security personnel requirements.

- CCR Section 5046: Locks:

A licensee shall ensure that the limited-access areas described in section 5042 of this division can be securely locked using commercial-grade, nonresidential door locks. A licensee shall also use commercial-grade, nonresidential door locks on all points of entry and exit to the licensed premises.

- CCR Section 5047: Alarm Systems:

(a) A licensee shall maintain an alarm system as defined in Business and Professions Code section 7590.1(n) at the licensed premises.

(b) A licensee shall ensure a licensed alarm company operator or one or more of its registered alarm agents installs, maintains, monitors, and responds to the alarm system.

(c) Upon request, a licensee shall make available to the Bureau all information related to the alarm system, monitoring, and alarm activity.

(d) If multiple licensed premises are contained within the same building, a single alarm system covering the entire building may be used by all of the licensees under the following conditions:

(1) Each licensee shall include in their security operating procedures, submitted with the application pursuant to section 5002(c)(29)(D) of this division, an explanation of how the alarm system will be shared, including who is responsible for contracting with the alarm company.

(2) All licensees shall have access to and be able to provide the information under subsection (c) of this section.

(3) All licensees shall be held responsible and subject to discipline for any violations of the alarm system requirements.

Manufacture Cannabis Safety Branch Licensing

- CCR Section 40131(l): A copy of the signed closed-loop system certification and a document evidencing approval of the extraction operation by the local fire code official required pursuant to Section 40223 or 40225, if applicable.

- CCR Section 40200: Security Plan:

Every licensee shall develop and implement a written security plan. At a minimum, the security plan shall include a description of the security measures to:

- (a) Prevent access to the manufacturing premises by unauthorized persons and protect the physical safety of employees. This includes, but is not limited to:
 - (1) Establishing physical barriers to secure perimeter access and all points of entry into a manufacturing premises (such as locking primary entrances with commercial-grade, non-residential door locks, or providing fencing around the grounds and driveway, and securing any secondary entrances including windows, roofs, or ventilation systems);
 - (2) Installing a security alarm system to notify and record incident(s) where physical barriers have been breached;
 - (3) Establishing an identification and sign-in/sign-out procedure for authorized personnel, suppliers, and visitors;
 - (4) Maintaining the premises such that visibility and security monitoring of the premises is possible; and
 - (5) Establishing procedures for the investigation of suspicious activities.
 - (b) Prevent against theft or loss of cannabis and cannabis products. This includes but is not limited to:
 - (1) Establishing an inventory system to track cannabis and cannabis products and the personnel responsible for processing it throughout the manufacturing process;
 - (2) Limiting access of personnel within the premises to those areas necessary to complete job duties, and to those time-frames specifically scheduled for completion of job duties, including access by outside vendors, suppliers, contractors or other individuals conducting business with the licensee that requires access to the premises;
 - (3) Supervising tasks or processes with high potential for diversion, including the loading and unloading of cannabis transportation vehicles; and
 - (4) Providing areas in which personnel may store and access personal items that are separate from the manufacturing areas.
 - (c) Secure and back up electronic records in a manner that prevents unauthorized access and that ensures the integrity of the records is maintained.
- CCR Section 40205: Video Surveillance:
 - (a) At minimum, a licensed premises shall have a digital video surveillance system with a minimum camera resolution of 1280 × 720 pixels. The video surveillance system shall be able to effectively and clearly record images of the area under surveillance.
 - (b) To the extent reasonably possible, all video surveillance cameras shall be installed in a manner that prevents intentional obstruction, tampering with, or disabling.
 - (c) Areas that shall be recorded on the video surveillance system include the following:
 - (1) Areas where cannabis or cannabis products are weighed, packed, stored, quarantined, loaded and unloaded for transportation, prepared, or moved within the premises;
 - (2) Limited-access areas;
 - (3) Security rooms;

- (4) Areas containing surveillance-system storage devices, which shall contain at least one camera to record the access points to such an area; and
- (5) The interior and exterior of all entrances and exits to the premises.
- (d) The surveillance system shall record continuously 24 hours per day and at a minimum speed of 15 frames per second.
- (e) Any on-site surveillance system storage devices shall be located in secure rooms or areas of the premises in an access-controlled environment.
- (f) The licensee shall ensure that all surveillance recordings are kept for a minimum of 90 days.
- (g) All video surveillance recordings shall be available on the licensed premises and are subject to inspection by the Department and shall also be copied and sent, or otherwise provided, to the Department upon request.
- (h) The video recordings shall display the current date and time of recorded events. Time is to be measured in accordance with the U.S. National Institute of Standards and Technology standards. The displayed date and time shall not significantly obstruct the view of recorded images.
- (i) If multiple licensed premises are contained within the same building, a single video surveillance system covering the entire building may be used by all of the licensees under the following conditions:
 - (1) Each applicant or licensee shall disclose on their premises diagram where the surveillance recordings are stored;
 - (2) Each applicant or licensee shall include in their security operating procedures an explanation of how the video surveillance system will be shared, including who is responsible for monitoring the video footage and storing any video recordings;
 - (3) All licensees shall have immediate access to the surveillance recordings to produce them pursuant to the requirements of this section;
 - (4) All licensees shall be held responsible and subject to discipline for any violations of the video surveillance requirements.
- CCR Section 40207: Notification of Theft, Loss, or Diversion:

If a licensee finds evidence of theft or diversion of cannabis or cannabis products, the licensee shall report the theft or diversion to the Department and local law enforcement within 24 hours of the discovery. The notice to the Department shall be in writing and shall include the date and time of the incident; a description of the incident, including items that were taken or missing; and the name of the local law enforcement agency that was notified of the incident.

CCR Section 40223(b): Ethanol extraction operations shall be approved by the local fire code official and shall be operated in accordance with applicable Division of Occupational Safety and Health (Cal/OSHA) regulations and any other state and local requirements.
- CCR Section 40225: Closed-Loop Extraction System Requirements:
 - (a) Chemical extractions using CO₂; a volatile solvent; or chlorofluorocarbon, hydrocarbon, or other fluorinated gas shall be conducted in a professional closed loop extraction system designed to recover the solvents. The system shall be commercially manufactured and bear a permanently affixed and visible serial number. The system shall be certified by a California-licensed engineer that

the system was commercially manufactured, safe for use with the intended solvent, and built to codes of recognized and generally accepted good engineering practices, such as:

- (1) The American Society of Mechanical Engineers (ASME);
 - (2) American National Standards Institute (ANSI);
 - (3) Underwriters Laboratories (UL); or
 - (4) The American Society for Testing and Materials (ASTM).
- (b) Professional closed loop systems, other equipment used, the extraction operation, and facilities must be approved for use by the local fire code official and comply with any required fire, safety, and building code requirements related to the processing, handling, and storage of the applicable solvent or gas.
- (c) The certification document required pursuant to subsection (a) shall contain the signature and stamp of a California-licensed professional engineer and the serial number of the extraction unit being certified.
- (d) The licensee shall establish and implement written procedures to document that the closed loop extraction system is maintained in accordance with the equipment manufacturer specifications and to ensure routine verification that the system is operating in accordance with specifications and continues to comply with fire, safety, and building code requirements.
- (e) A licensee shall develop standard operating procedures, good manufacturing practices, and a training plan prior to producing extracts. Any personnel using solvents or gases in a closed loop system to create extracts must be trained on how to use the system, have direct access to applicable safety data sheets, and handle and store solvents and gases safely.
- (f) The extraction operation shall be operated in an environment with proper ventilation, controlling all sources of ignition where a flammable atmosphere is or may be present, and shall be operated in accordance with applicable Division of Occupational Safety and Health (Cal/OSHA) regulations and any other state and local requirements.
- (g) No closed loop extraction system operation shall occur in an area zoned as residential.

LOCAL

Central California Emergency Medical Services Agency

The EMS Authority provides statewide coordination and leadership for the planning, development, and implementation of local EMS systems. California has 33 local EMS systems, which provide EMS for California's 58 counties. Seven regional EMS systems and 26 single County agencies provide the services. Regional systems are usually comprised of small, more rural, less-populated counties and single-County systems generally exist in the larger and more urban counties (EMSA 2018).

Yolo County 2030 Countywide General Plan

The goals and policies of the Public Facilities and Services, Land Use and Community Character and Health and Safety Elements of the Yolo County 2030 Countywide General Plan seek to ensure that infrastructure and services will be sufficient to support existing and new development in Yolo County.

Policies related to public services and the project include:

- **Policy PF-4.1:** Ensure the provision of appropriate law enforcement service and facilities to serve existing and planned land uses.
- **Policy PF-4.2:** Strive to maintain an average response time of 12 minutes for 90 percent of priority law enforcement calls in the rural areas.

- **Policy PF-4.3:** Maintain a minimum ratio of 1.75 sworn officers per 1,000 service population, which is defined as both the number of residents and employees located solely within the unincorporated area. For the purposes of this policy, an employee is weighted at 0.26 the cost of service for a resident. Maintenance of this ratio includes the necessary facilities, equipment, and non-uniformed personnel to support that ratio. Commercial and/or industrial projects, businesses, events, and other proposals that generate higher demands for Sheriff's services shall be evaluated to determine if additional resources are needed to address potential fiscal impacts.
- **Policy PF-4.4:** Incorporate law enforcement concerns into land use planning, including the following measures:
 - Identify and mitigate potential law enforcement hazards of new development during the project review and approval process.
 - Work with local community groups to prevent crime.
 - Promote the creation of Neighborhood Watch Groups in residential areas.
 - Coordinate with Chambers of Commerce, business associations, and others to increase public safety within commercial areas.
- **Action PF-A25:** Enhance public safety through implementation of "Crime Prevention Through Environmental Design" strategies including designing the placement of activities and physical features, such as buildings, entrances and exits, corridors, fences, pavement, signs, lighting and landscaping, in such a way as to clearly define public and private space, maximize visibility, control access and circulation, and foster positive social interaction.
- **Policy PF-5.1:** Improve the performance and efficiency of fire protection and emergency medical services
- **Policy PF-5.2:** Maintain mutual aid agreements between fire districts and other emergency medical service providers to ensure efficient use of available resources.
- **Policy PF-5.3:** Require assertive fire protection measures in all development to supplement limited rural fire district resources.
- **Policy PF-5.4:** Encourage fire districts and other emergency medical service providers to achieve National Fire Protection Association standards of an average response time for emergency calls of nine minutes at least 90 percent of the time in the unincorporated communities and 15 minutes at least 80 percent of the time in rural areas, with the exception of remote areas (requiring a travel distance of more than 8 miles).
- **Policy PF-5.5:** Encourage fire districts to maintain an overall fire insurance (ISO) public protection classification (PPC) rating of Rural 7 or better for fire protection service within the unincorporated communities.
- **Policy PF-5.9:** The County shall require, and applicants must provide, a will-serve letter from the appropriate fire district/department confirming the ability to provide fire protection services to the project, prior to each phase.
- **Policy PF-5.10:** Reduce vegetation and other wildland fuels on County-owned land within the State Responsibility Area to reduce the intensity of fires, consistent with biological, scenic, and recreational considerations.
- **Action PF-A29:** Require that new development comply with all State and local requirements within the State Responsibility Area.

- **Action PF-A30:** Maintain requirements that fire sprinklers be installed in all new residences and commercial/industrial areas where appropriate.
- **Policy PF-6.2:** Work to ensure that schools serving new development are construct concurrent with the needs of the community, to the extent allowed by State law.
- **Policy PF-12.6:** Provide the public facilities and services necessary to meet community needs, in an efficient manner.
- **Policy LU-5.5:** Ensure that public facilities, services, and amenities are distributed equitably and in locations that enhance the quality of life for the broadest number of County residents.
- **Policy CC-2.2:** Ensure that the appropriate base level of rural services and infrastructure for existing development in each community is required in connection with new development.
- **Policy HS-3.1:** Manage the development review process to protect people, structures, and personal property from unreasonable risk from wildland fires.
- **Policy HS-3.2:** Encourage well-organized and efficient coordination between fire agencies and the County.
- **Policy HS-3.3:** Clearly communicate the risks, requirements, and options available to those who own land and live in wildfire hazard areas.

Measure K Cannabis Tax

In June 2018 the voters of Yolo County, including those in the incorporated cities, approved Measure K. This measure authorizes the County to impose a general tax on the gross receipts of commercial cannabis. The Board of Supervisors adopted Ordinance 1496 that amends Chapter 18 to Title 3 to the Yolo County Code to impose a County general tax on cannabis businesses in the unincorporated area of Yolo County. The ordinance establishes the following tax rates: a minimum tax rate of 1 percent of gross receipts per fiscal year, not to exceed a maximum tax rate of 15 percent of gross receipts per fiscal year, with the initial tax rate for cultivation being set at 4 percent of gross receipts per fiscal year with an automatic increase to 5 percent as of July 1, 2020, and the initial tax rate for all other commercial cannabis businesses being set at 5 percent, with subsequent adjustments of no more than 2 percentage points (up or down) in any 12 month period. The tax applies to all medical and nonmedical cannabis businesses.

The tax is for general governmental purposes and revenue generated from the tax can be spent for unrestricted general revenue purposes, including for items such as criminal enforcement of illegal cultivation, early childhood intervention and prevention, youth development, substance abuse education and treatment for children and adults, rural infrastructure and programs and cannabis research, or other expenditure per the Board of Supervisors' direction.

3.13.3 Environmental Impacts and Mitigation Measures

METHODS AND ASSUMPTIONS

The impact analysis below evaluates to what extent adoption and implementation of the CLUO, including issuance of subsequent Cannabis Use Permits pursuant to the CLUO, may result in significant impacts on public services and recreation facilities that could trigger physical environmental impacts. This program-level analysis is based upon information provided in Section 3.13.1, "Environmental Setting," and communications with fire departments and the Yolo County Sheriff's Office. The reader is referred to Section 3.9, "Hazards and Hazardous Materials," for an analysis of wildfire hazards.

The assumptions for the extent of cannabis uses identified in Table 2-5, Section 3.0, “Environmental Analysis Approach,” Appendix D, and Exhibits 2-4 through 2-8 in Chapter 2, “Description of Preferred Alternative and Equal Weight Alternatives,” were used in the impact analysis below. Specific requirements of existing laws and regulations described in the regulator setting as well as the proposed CLUO (see Appendix C) were assessed for their ability to avoid or reduce impacts on public services and recreation facilities.

Chapter 4, “Cumulative Impacts and Overconcentration,” contains a separate detailed analysis of the potential for cumulative effects not otherwise identified in this section, and effects from concentrations or clusters of multiple cannabis uses located in distinct subregions of the County.

THRESHOLDS OF SIGNIFICANCE

Thresholds of significance are based on Appendix G of the State CEQA Guidelines. These thresholds address possible impacts anticipated with the implementation of the CLUO under the five alternatives under consideration.

The project would result in a significant impact related to public services or recreation if it would:

- result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - fire protection,
 - police protection,
 - schools,
 - parks, or
 - other public facilities;
- increase the use of existing neighborhood and regional parks or other recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

As described in Section 3.0, “Approach to the Environmental Analysis,” implementation of the CLUO would not result in impacts on public schools, parks, recreation, or other governmental services that would require the construction of new facilities to serve the project. Therefore, these impact issue areas are not further evaluated.

IMPACT ANALYSIS

Impact PS-1: Result in Substantial Adverse Physical Impacts Associated with the Need for New or Physically Altered Fire Protection Facilities

Adoption and implementation of the proposed CLUO, including issuance of subsequent Cannabis Use Permits pursuant to the adopted CLUO, could create additional structures, electrical uses, and other cannabis operations that could expose people to additional fire risk, leading to the potential need in increased fire protection facilities. Compliance with Sections 8-21408(K), 8-21408(Q), and 8-21408(FF) of the CLUO, the California Building Standards Code, California Fire Code, and state cannabis regulations would provide a sufficient level of fire protection and access such that fire protection services would not be substantially affected. This impact would be **less than significant** for all alternatives.

As noted in Section 3.13.1, “Environmental Setting,” fire services within the unincorporated areas of Yolo County are provided by 15 FPDs. Under the CLUO, new cannabis uses could be developed in the unincorporated areas of the County that could increase fire protection service demands as a result of new/additional structures and people in certain areas that may require fire protection. Development under the CLUO could result in additional structures and people in particular areas that are required to comply with the California Building Standards Code, the California Fire Code, and state cannabis regulations.

Fire protection demands for cannabis operations are generally no different than for similar land uses within the cannabis use categories identified in Section 8-2.1405 of the proposed CLUO. In general, fire protection related activities include plan review, site/structure inspections, fire code enforcement, fire preparedness/prevention education, fire suppression, and hazardous material/emergency response. Cannabis cultivation (both indoor and outdoor) including nurseries and processing, share fire risk characteristics of similar agricultural uses, for example, other field and nursery crops, and other agricultural processing activities. Due to field spacing (for outdoor crops) and limited overall grow size for greenhouse environments fire risk may be comparably less. Retail (dispensary) cannabis uses share fire risk characteristics of other similar retail uses such as pharmacies and drug stores operated in structures built for commercial occupancies, such as retail sales.

Manufacturing and testing uses share general similarities with other manufacturing, laboratory, and research development uses. For example, to create cannabis oil, a solvent (e.g. butane, ethanol, isopropanol, propane, etc.) is used to draw tetrahydrocannabinol (THC) from the flowers, leaves, and stems of cannabis plants. The resulting mixture of solvent and THC is then filtered and collected. Afterwards, the mixture is heated to evaporate the solvent and acquire the desired oil. Applicable fire regulations govern the maximum allowable quantity of hazardous materials in various controlled and non-controlled areas of a structure.

“Manufacturing” or “manufacturing operation” is defined in applicable state regulations to include all aspects of the extraction and/or infusion processes, including processing, preparing, holding, storing, packaging, or labeling of cannabis products. Manufacturing also includes any processing, preparing, holding, or storing of components and ingredients. Manufacturing may involve nonvolatile and volatile solvents which will determine what kind of California cannabis manufacturing license is required. “Nonvolatile solvent” means any solvent used in the extraction process that is not a volatile solvent, including carbon dioxide. “Volatile solvent” means any solvent that is or produces a flammable gas or vapor that, when present in the air in sufficient quantities, will create explosive or ignitable mixtures. The state’s examples of volatile solvents include, butane, hexane, propane, and ethanol. A Type 6 cannabis manufacturing licensee can only use nonvolatile solvents, whereas a Type 7 licensee can use both nonvolatile and volatile solvents in extractions and infusions.

As described above, overall fire risk characteristics of cannabis activities such as fuel load, surface area, heat content, fuel moisture, and other considerations are comparable to similar uses in comparable land use categories. Potential risks involving combustibility, flammability, ventilation, and physical hazards are regulated through existing codes and requirements. Cannabis activities do not introduce new or unusual fire risk characteristics that would affect fire response as compared to uses allowed at the same locations under existing conditions.

The CLUO provides the following performance standards that address fire safety:

- Section 8-2.1408(F) requires design and construction of buildings and structures to comply with all applicable codes, standards, regulations, and guidelines. In addition, all required building permits shall be obtained.
- Section 8-2.1408(K) requires all operations to have a rapid entry system for use by emergency personnel and the permittees must demonstrate safe and adequate driveway access to the satisfaction of the County or Caltrans, as appropriate, in compliance with applicable standards. This standard also requires that driveways have an all-weather surface.

- Section 8-2.1408(Q) requires “all uses to comply with the California Building, Electrical, and Fire Codes as adopted by the County, and ensure adequate access, water availability, and other conditions for fire protection as applicable for the location and use/activity” Permittees shall manage vegetation and maintain fire breaks to minimize fire danger.
- Section 8-2.1408(FF) requires that sites have adequate parking that would not obstruct emergency or fire access to the area.

Permittees would be required to demonstrate compliance with these fire protection measures through site design details under CLUO Section 8-2.1408(OO). These CLUO performance standards would be consistent with General Plan Policy PF-5.3 and Action PF-A29 regarding the provision of fire protection measures.

CCR Title 17, Division 1, Chapter 13 provides fires safety requirements for cannabis manufacturing uses:

- Section 40223(b): Ethanol extraction operations shall be approved by the local fire code official and shall be operated in accordance with applicable Division of Occupational Safety and Health (Cal/OSHA) regulations and any other state and local requirements.
- Section 40225(b): Professional closed loop systems, other equipment used, the extraction operation, and facilities must be approved for use by the local fire code official and comply with any required fire, safety, and building code requirements related to the processing, handling, and storage of the applicable solvent or gas.
- Section 40225(d): The licensee shall establish and implement written procedures to document that the closed loop extraction system is maintained in accordance with the equipment manufacturer specifications and to ensure routine verification that the system is operating in accordance with specifications and continues to comply with fire, safety, and building code requirements.
- Section 40280(a): The licensee shall implement a training program to ensure that all personnel present at the premises are provided information and training that covers health and safety hazards and emergency response procedures.

Compliance with these standards for manufacturing uses may involve additional improvements to buildings to suppress and/or contain fires (e.g., sprinklers, fire rated doors and walls, and other similar improvements) as well as the use of hazardous material storage lockers for flammable materials that are designed to be fire resistant.

Alternatives 1, 2, 3, and 5 assume that personal use outdoor cultivation may occur in any zoning district on a parcel with a legal residence. Personal use outdoor cultivation of up to six plants is assumed to occur within pots or garden areas on the grounds of the parcel. Alternative 4 would limit personal use cultivation to indoor only. These activities would likely involve no more than 100 square feet of land area and would be required to be outside of front yard and side yard setback areas. Given the minor extent of this use, no increases in the demand for fire services are anticipated, and no new/expanded fire protection facilities would be necessary.

Alternative 1: Cultivation (Ancillary Nurseries and Processing Only) with Existing Limits (Existing Operations with CLUO) (CEQA Preferred Alternative)

This alternative assumes the retention of the current extent of cannabis cultivation that is allowed in the County. Nine of the 78 existing and eligible cannabis cultivation sites are assumed to relocate under this alternative to comply with zoning standards under the CLUO. As shown in Exhibit 3.13-2, existing and eligible cultivation sites under Alternative 1 are located in the following FPDs:

- Capay Valley FPD,
- Dunnigan FPD,
- Willow Oak FPD,

- Esparto FPD,
- Madison FPD,
- Winters FPD,
- Knights Landing FPD,
- Zamora FPD,
- Yolo FPD,
- Clarksburg FPD, and
- Springlake FPD.

In addition to the CLUO performance standards specified above (Sections 8-2.1408[F], 8-2.1408[K], 8-2.1408[Q], 8-2.1408[FF], and 8-2.1408[OO]), the nine cultivation site relocations assumed under Alternative 1 would be required to comply with state requirements pertaining to fire protection. These requirements include CCR Title 24, Part 2, Chapter 7A, which requires buildings to be fire resistant (roof material, decking material, accessory structures, and venting to resist the intrusion of flame and ember); PRC Section 4291, which addresses defensible space and fuel modification standards; and provision of sufficient fire equipment and emergency access standards.

Based on the FPDs experience over the past couple of years, the development under Alternative 1 would not exceed the existing response capability of the FPDs (Burns, Tofoya 2019). Therefore, through compliance with the proposed CLUO regulations and the CA Building Standards Code and CA Fire Code requirements, Alternative 1 would not increase the need for expanded fire protection services such that construction of new fire protection facilities (e.g., fire stations) would be necessary.

This impact would be **less than significant** under Alternative 1.

Alternative 2: All License Types with Moderate Limits

As shown in Exhibit 3.13-3, Alternative 2 is assumed for analysis purposes to add 54 new cannabis uses (cultivation and noncultivation) to the following FPDs:

- Capay Valley FPD,
- Dunnigan FPD,
- Willow Oak FPD,
- Esparto FPD,
- Madison FPD,
- Winters FPD,
- Zamora FPD,
- Yolo FPD, and
- Springlake FPD.

Cannabis uses would be required to comply with PRC Section 4291 and CLUO Section 8-2.1408(Q) for provision of fire breaks to protect buildings and avoid the spread of fire; CCR Title 24, Part 2, Section 701A3.2 and CLUO Section 8-2.1408(F) for building design to be fire resistant and avoid the creation of a fire; and CLUO Section 8-2.1408(K) to ensure adequate access. Manufacturing uses would be required to comply with CCR Title 17, Division 1, Chapter 13, Sections 40223(b), 40225(b), 40225(d), and 40280(a), which require fire control measures that include proper handling of flammable materials to avoid fire hazards and engineering of the closed loop extraction systems to avoid accidental fire events. Compliance with these standards would ensure that cannabis uses do not create or increase fire hazards to residents or buildings.

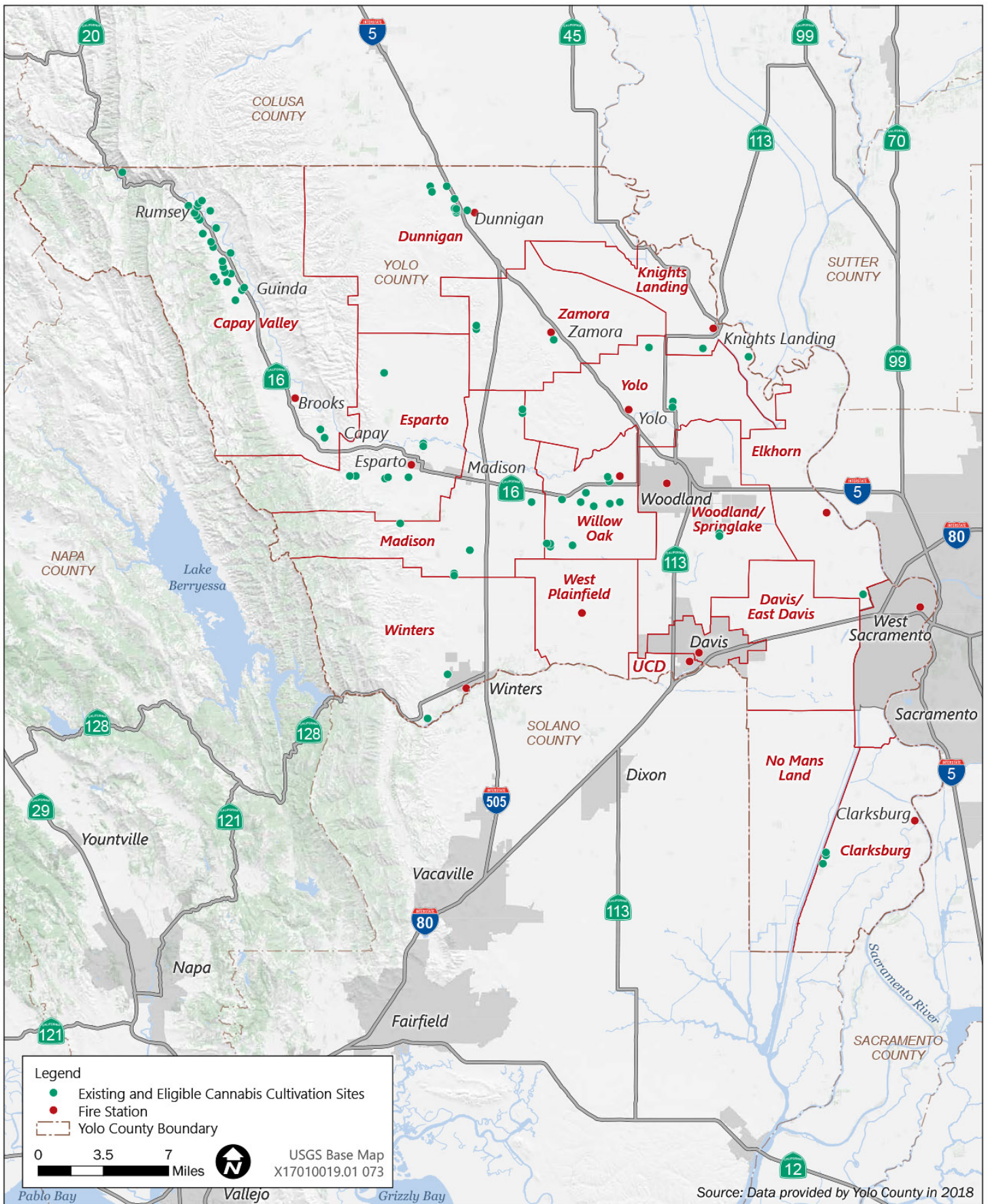


Exhibit 3.13-2

Alternative 1 Cannabis Uses and Fire Protection Districts

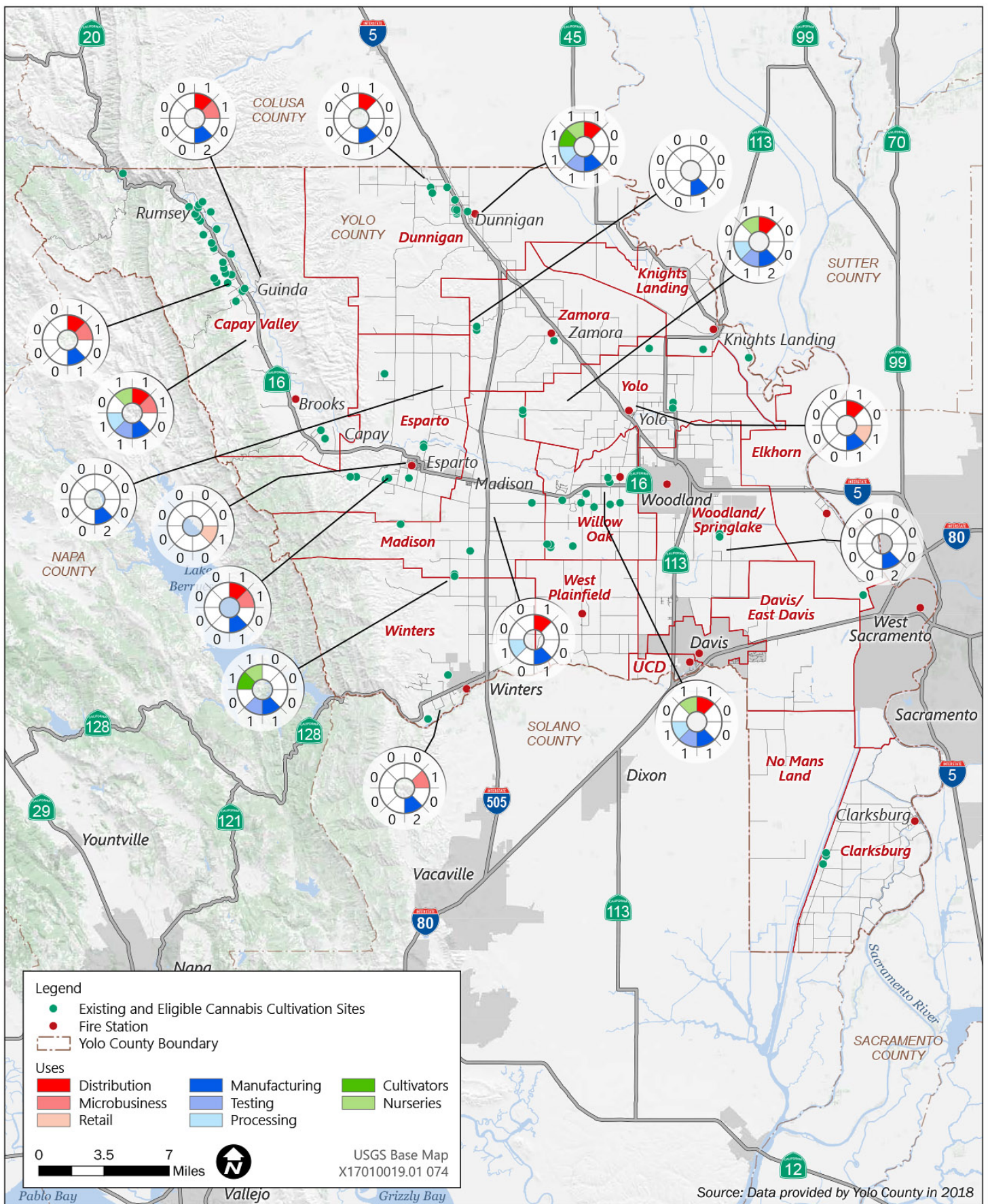


Exhibit 3.13-3

Alternative 2 Cannabis Uses and Fire Protection Districts

Compliance with the applicable CLUO performance standards, the California Building Standards Code, the California Fire Code, and state cannabis regulations would ensure that fire protection and safety measures are incorporated into the cannabis site designs so that a demand for new fire protection services would be minimized. In addition, as part of the land use permitting process under the CLUO, each individual cannabis project would be evaluated to ensure compliance with the local and state fire protection requirements. This project evaluation would also verify that sufficient response capability exists within the applicable FPD and automatic aid jurisdictions. On-site inspections of each cannabis project would be conducted to ensure compliance with County and state fire protection requirements. Given these provisions, there would be no need for expanded fire protection services that would necessitate the construction of new fire protection facilities (e.g., fire stations).

If a hazardous materials incident was beyond the response capabilities of the local Fire Protection District, the Yolo Operational Area Hazardous Response Team would respond. Nevertheless, there would be a need for local fire personnel to become familiar with volatile manufacturing facilities. This could be provided by the facility owners working with the applicable FPDs and would not require new fire protection facilities.

This impact would be **less than significant** under Alternative 2.

Alternative 3: All License Types with High Limits

Alternative 3 is assumed to result in new cultivation sites in all of the County's fire districts. As shown in Exhibit 3.13-4, Alternative 3 is assumed for analysis purposes to add a total of 186 new cannabis uses (cultivation and noncultivation) to the following FPDs:

- Capay Valley FPD,
- Dunnigan FPD,
- Willow Oak FPD,
- Esparto FPD,
- Madison FPD,
- Winters FPD,
- Zamora FPD,
- West Plainfield FPD,
- Yolo FPD, and
- Springlake FPD.

Compliance with the applicable CLUO performance standards, the California Building Standards Code, the California Fire Code, and state cannabis regulations identified above and in the discussion for Alternative 2 would ensure that fire protection and safety measures are incorporated into the cannabis site designs so that a demand for new fire protection services would be minimized. In addition, as part of the land use permitting process under the CLUO, each individual cannabis project would be evaluated to ensure compliance with the local and state fire protection requirements. This project evaluation would also verify that sufficient response capability exists within the applicable FPD and automatic aid jurisdictions. On-site inspections of each cannabis project would be conducted to ensure compliance with County and state fire protection requirements.

Given these provisions, there would be no need for expanded fire protection services that would necessitate the construction of new fire protection facilities (e.g., fire stations).

If a hazardous materials incident was beyond the response capabilities of the local Fire Protection District, the Yolo Operational Area Hazardous Response Team would respond. Nevertheless, there would be a need for training and familiarization of local fire personnel with volatile manufacturing facilities. This could be provided by the facility owners working with the applicable FPDs and would not require new fire protection facilities.

This impact would be **less than significant** under Alternative 3.

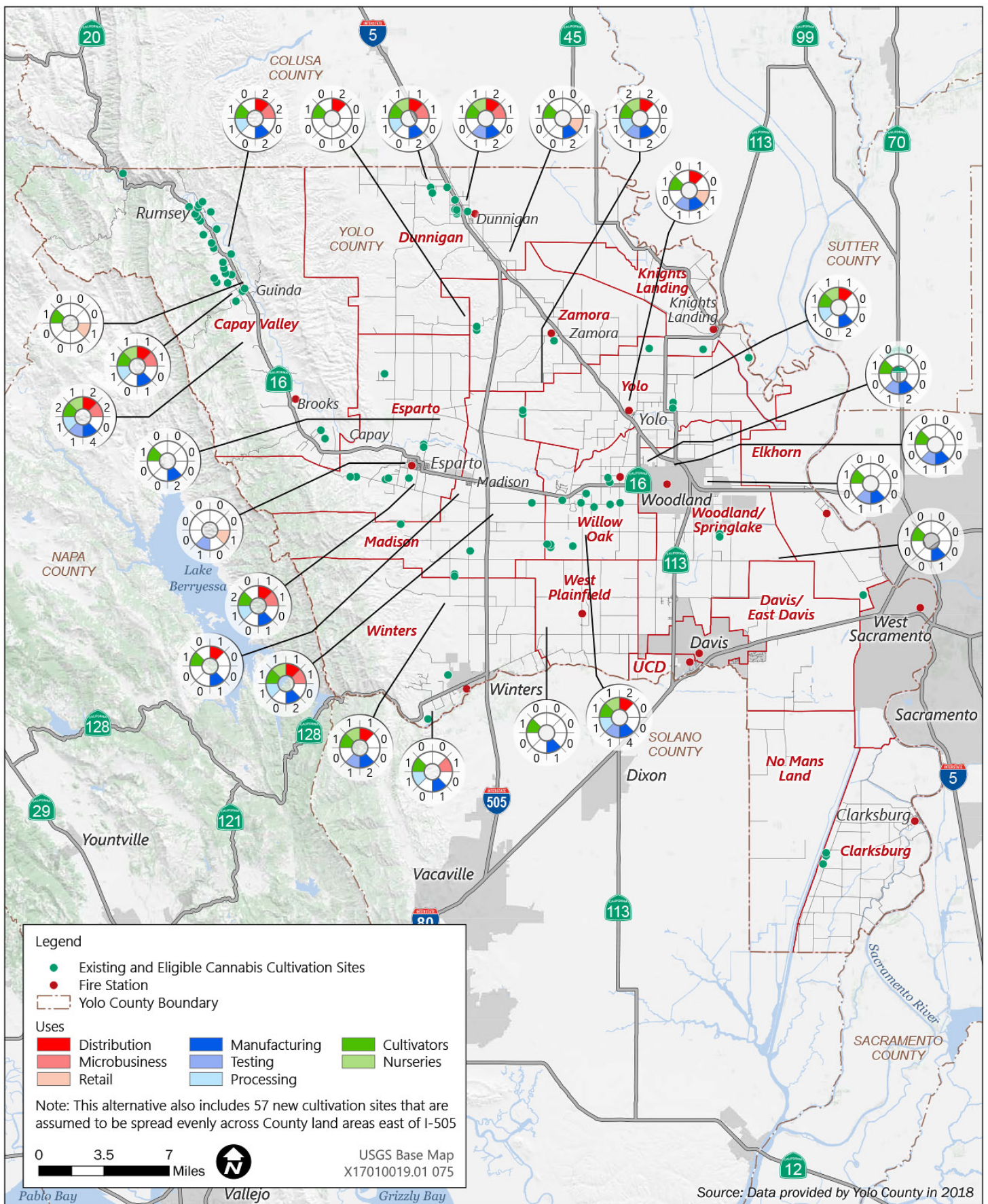


Exhibit 3.13-4

Alternative 3 Cannabis Uses and Fire Protection Districts

Alternative 4: Mixed-Light/Indoor License Types Only with Moderate Limits, No Hoop Houses or Outdoor Types

As shown in Exhibit 3.13-5, Alternative 4 is assumed to add for analysis purposes 54 new cannabis uses (cultivation and noncultivation) into the following FPDs:

- Capay Valley FPD,
- Dunnigan FPD,
- Willow Oak FPD,
- Esparto FPD,
- Madison FPD,
- Winters FPD,
- Zamora FPD,
- Yolo FPD, and
- Springlake FPD.

This alternative also assumes that 75 of the existing and eligible outdoor cannabis cultivation sites would convert entirely to indoor or mixed-light (greenhouse) cultivation.

Compliance with the applicable CLUO performance standards, the California Building Standards Code, the California Fire Code, and state cannabis regulations identified above and in the discussion for Alternative 2 would ensure that fire protection and safety measures are incorporated into the cannabis site designs so that a demand for new fire protection services would be minimized. In addition, as part of the land use permitting process under the CLUO, each individual cannabis project would be evaluated to ensure compliance with the local and state fire protection requirements. This project evaluation would also verify that sufficient response capability exists within the applicable FPD and automatic aid jurisdictions. On-site inspections of each cannabis project would be conducted to ensure compliance with County and state fire protection requirements. Given these provisions, there would be no need for expanded fire protection services that would necessitate the construction of new fire protection facilities (e.g., fire stations).

If a hazardous materials incident was beyond the response capabilities of the local Fire Protection District, the Yolo Operational Area Hazardous Response Team would respond. Nevertheless, there would be a need for training and familiarization of local fire personnel with volatile manufacturing facilities. This could be provided by the facility owners working with the applicable FPDs and would not require new fire protection facilities.

This impact would be **less than significant** under Alternative 4.

Alternative 5: All License Types with Moderate Limits, within Agricultural Zones Only, No Retail

As shown in Exhibit 3.13-6, Alternative 5 is assumed to add for analysis purposes 52 new cannabis uses (cultivation and noncultivation) to the following FPDs:

- Capay Valley FPD,
- Dunnigan FPD,
- Willow Oak FPD,
- Esparto FPD,
- Madison FPD,
- Winters FPD,
- Zamora FPD,
- Yolo FPD, and
- Springlake FPD.

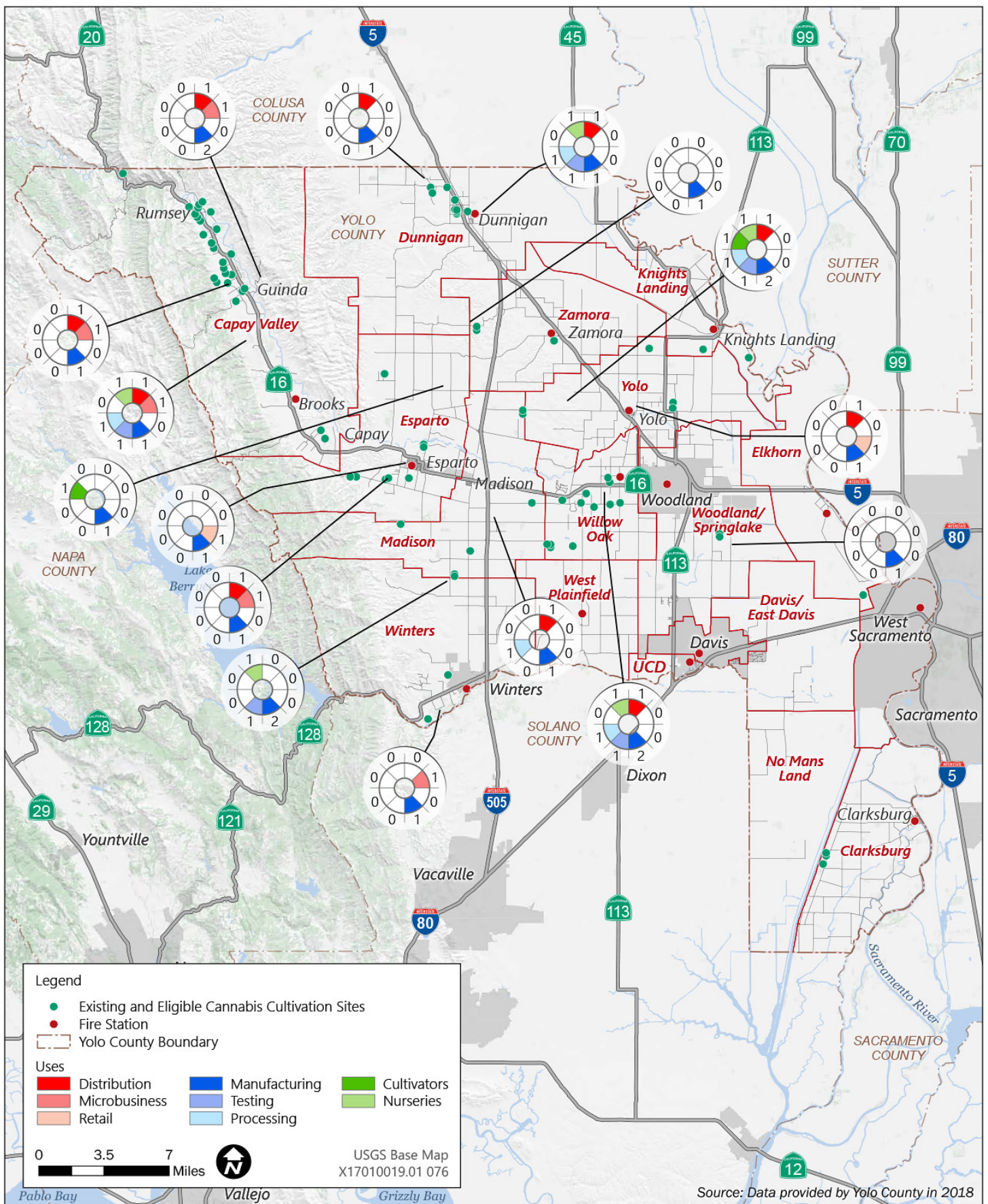


Exhibit 3.13-5

Alternative 4 Cannabis Uses and Fire Protection Districts

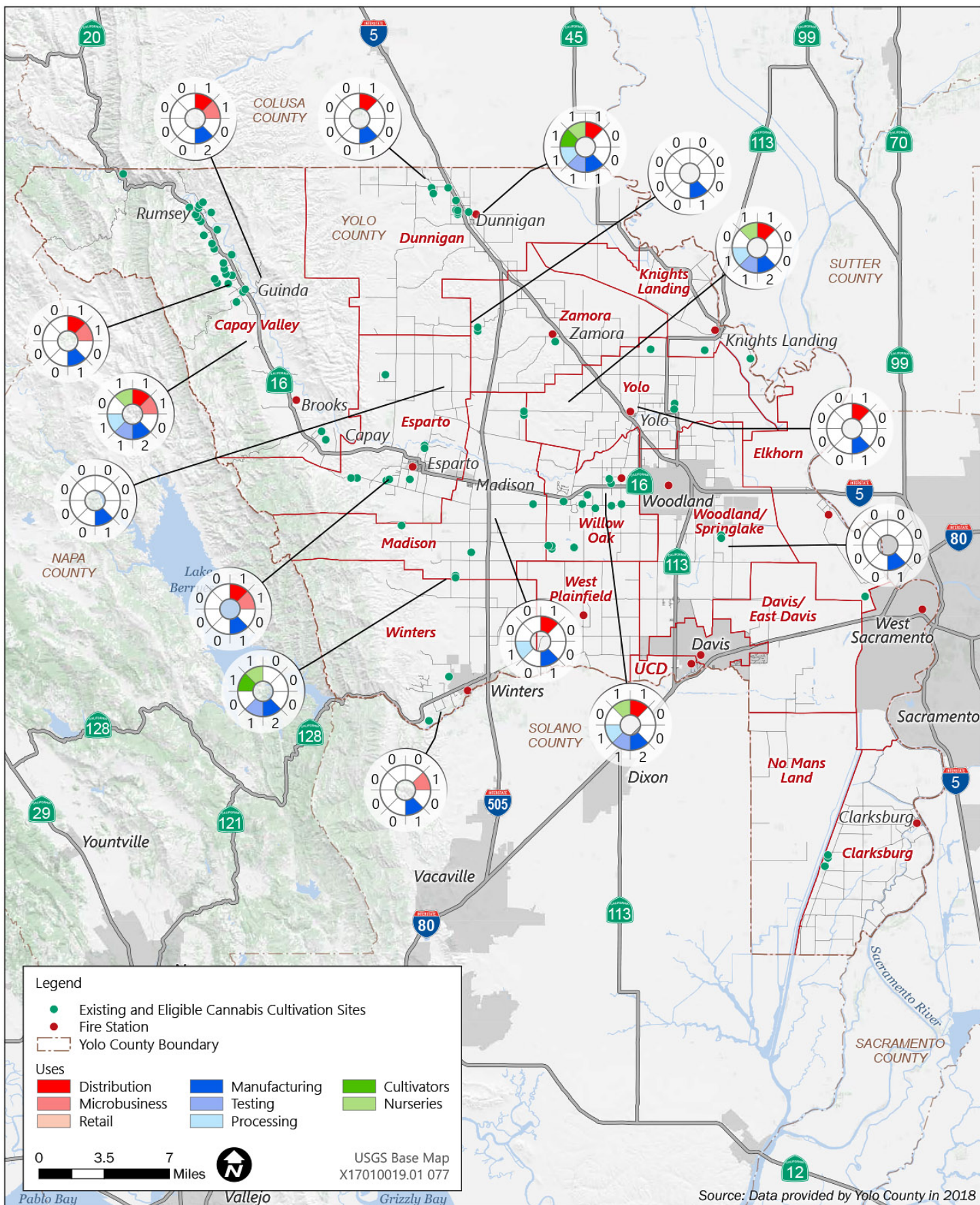


Exhibit 3.13-6

Alternative 5 Cannabis Uses and Fire Protection Districts

Compliance with the applicable CLUO performance standards, the California Building Standards Code, the California Fire Code, and state cannabis regulations identified above and in the discussion for Alternative 2 would ensure that fire protection and safety measures are incorporated into the cannabis site designs so that a demand for new fire protection services would be minimized. In addition, as part of the land use permitting process under the CLUO, each individual cannabis project would be evaluated to ensure compliance with the local and state fire protection requirements. This project evaluation would also verify that sufficient response capability exists within the applicable FPD and automatic aid jurisdictions. On-site inspections of each cannabis project would be conducted to ensure compliance with County and state fire protection requirements. Given these provisions, there would be no need for expanded fire protection services that would necessitate the construction of new fire protection facilities (e.g., fire stations).

If a hazardous materials incident was beyond the response capabilities of the local Fire Protection District, the Yolo Operational Area Hazardous Response Team would respond. Nevertheless, there would be a need for training and familiarization of local fire personnel with volatile manufacturing facilities. This could be provided by the facility owners working with the applicable FPDs and would not require new fire protection facilities.

This impact would be **less than significant** under Alternative 5.

Mitigation Measures

No mitigation is required for any of the alternatives.

Impact PS-2: Result in Substantial Adverse Physical Impacts Associated with the Need for New or Physically Altered Law Enforcement Facilities

Adoption and implementation of the proposed CLUO, including issuance of subsequent Cannabis Use Permits pursuant to the adopted CLUO, would not require increased law enforcement services that would result in the need for new or altered facilities from compliance with the CLUO and state regulations. Potential impacts related to law enforcement services for all alternatives would be **less than significant** for all alternatives.

As stated above in Section 3.13.1, “Environmental Setting,” law enforcement protection services are provided by the Yolo County Sheriff’s Department. The Sheriff’s Office and Cannabis Task Force have received calls regarding illegal cultivation sites and thefts on licensed cannabis cultivation sites. As shown in Table 3.13-4, there were 12 illegal cannabis abatements and 9 thefts at licensed cannabis sites in 2018.

The CLUO provides the following performance standards that address security:

- Section 8-2.1408(LL) requires “a fully functional, operating, site security system with cameras operating 24-hours a day, seven days a week, is a requirement. Permittees shall describe how site and operational security will be addressed specific to the site and use type, including features that may consist of access control, alarms, security personnel, guard dogs, fencing, and building/structural security. All gates, doors, and windows of structures and facilities used for cannabis activities shall be locked/secured. Permittees are responsible to prohibit individuals from loitering on the premises if they are not engaged in activity expressly related to the activity/operations. A security plan shall be provided to the County and shall be treated as confidential by the County pursuant to Section 6255(a) of the CGC. Failure to secure a site pursuant to the security plan may be grounds for revocation.”
- Section 8-2.1410(D) requires a 24-hour good neighbor contract, an odor control plan, a security plan, and potentially other as identified by the County.

Permittees would be required to demonstrate compliance with these security measures through site design details under CLUO Section 8-2.1408(OO). These CLUO performance standards would be consistent with General Plan Policy PF-4.4 and Action PF-A25 regarding law enforcement.

Construction of cannabis-related buildings under all of the CLUO alternatives would be required to pay the County Facilities and Services Development Fee at the building permit issuance that would provide funding for facility improvements or new facilities for law enforcement whose timing would be determined by County as part of facilities planning. Pursuant to General Plan Policies PF-12.1 through PF-12.3, the development of these facilities by the County would be conducted in an environmentally sustainable manner (Yolo County 2009:416).

As further described in Section 3.13.2, “Regulatory Setting,” state cannabis regulations include the following security requirements for processing, testing, distribution, retail, and microbusinesses:

- Sections 5042 and 5043: standards that limit access to authorized personnel, documentation of authorized individuals, and employee badge requirements.
- Section 5044: requirements for the provision of video surveillance system.
- Section 5045: standards for provision of security personnel.
- Sections 5046 and 5047: requirements for locks for all points of entry and exit and the provision of alarm systems.

State cannabis regulations include the following security requirements for manufacturing uses:

- Section 40200: development and implementation of a security plan that include requirements for a security alarm system and documentation of authorized individuals,
- Section 40205: requirements for the provision of video surveillance system.

Alternatives 1, 2, 3, and 5 assume that personal use outdoor cultivation may occur in any zoning district on a parcel with a legal residence. Personal use outdoor cultivation of up to six plants is assumed to occur within pots or garden areas on the grounds of the parcel. Alternative 4 would limit personal use cultivation to indoor only. These activities would likely involve no more than 100 square feet of land area and would be required to be outside of front yard and side yard setback areas. CLUO Section 8-2.1408(GG) requires that personal outdoor cultivation not be visible from public rights-of-way. Given these CLUO requirements and that the personal use outdoor cultivation would be an ancillary use to the developed parcel, no significant law enforcement impacts are expected.

Alternative 1: Cultivation (Ancillary Nurseries and Processing Only) with Existing Limits (Existing Operations with CLUO) (CEQA Preferred Alternative)

This alternative assumes the retention of the current extent of cannabis cultivation that is allowed in the County. Nine of the 78 existing and eligible cannabis cultivation sites are assumed to relocate under this alternative to comply with zoning standards under the CLUO. The CLUO performance standards set forth in Section 8-2.1408(LL) and Section 8-2.1410(D) would minimize the potential for criminal activities through implementation of site security system that includes the implementation of access control, security cameras, alarms, security personnel, and fencing at sites.

As identified in Table 3.13-4, there have been cannabis-related crime activities in the County. However, Yolo County has Sheriff officers dedicated solely to crimes related to cannabis. While additional staffing may be required, this should not require construction of additional law enforcement facilities. Compliance with CLUO performance standards measures would ensure that law enforcement and safety measures are incorporated into each site and there would be no need for expanded law enforcement facilities.

This impact would be **less than significant** under Alternative 1.

Alternative 2: All License Types with Moderate Limits

Exhibit 2-5 identifies the assumed distribution of new cannabis uses in the County that consists of 54 new cultivation and noncultivation uses (see Table 2-4). Alternative 2 is also assumed to result in the relocation of 30 of the 78 existing and eligible cannabis cultivation sites due to compliance with zoning and buffer standards in the CLUO (see Table 2-5).

As identified under Alternative 1, there have been cannabis-related crime activities in the County. However, Yolo County has Sheriff officers dedicated solely to crimes related to cannabis. While additional staffing may be required, this should not require construction of additional law enforcement facilities. Compliance with CLUO performance standards measures would ensure that law enforcement and safety measures are incorporated into each site and there would be no need for expanded law enforcement facilities.

Compliance with CLUO performance standards set forth in Section 8-2.1408(LL) and Section 8-2.1410(D) would ensure that law enforcement and safety measures are incorporated into each site. CCR Sections 5042, 5043, 5046, 5047, 40200, and 40205 require on-site security measures. These standards would minimize the potential for criminal activities through controlled access for authorized personnel and locked door requirements at noncultivation sites (CCR Sections 5042 and 5043), security measures that include video surveillance, security personnel, lock and alarm system requirements (CCR Sections 5044, 5045, 5046, and 5047). Manufacturing sites are required to provide a security plan that implements access controls to the building, alarm system requirements and video surveillance (CCR Sections 40200 and 40205). Implementation of these measures would ensure protection of sites that would not require the need to expand law enforcement services and facilities.

This impact would be **less than significant** under Alternative 2.

Alternative 3: All License Types with High Limits

As shown in Exhibit 2-6, Alternative 3 assumes 186 new cannabis uses (cultivation and noncultivation) would be generally spread throughout the County though 40 new cannabis uses are assumed to be sited along the SR 16 corridor west of the City of Woodland (see Table 2-4). This alternative is also assumed to result in the relocation of nine of the 78 existing and eligible cannabis cultivation sites due to compliance with zoning requirements under the CLUO (see Table 2-5).

As identified under Alternative 1, there have been cannabis-related crime activities in the County. However, Yolo County has Sheriff officers dedicated solely to crimes related to cannabis. While additional staffing may be required, this should not require construction of additional law enforcement facilities.

Compliance with CLUO performance standards set forth in Section 8-2.1408(LL) and Section 8-2.1410(D) would ensure that law enforcement and safety measures are incorporated into each site. CCR Sections 5042, 5043, 5046, 5047, 40200, and 40205 require on-site security measures. These standards would minimize the potential for criminal activities through controlled access for authorized personnel and locked door requirements at noncultivation sites (CCR Sections 5042 and 5043), security measures that include video surveillance, security personnel, lock and alarm system requirements (CCR Sections 5044, 5045, 5046, and 5047). Manufacturing sites are required to provide a security plan that implements access controls to the building, alarm system requirements and video surveillance (CCR Sections 40200 and 40205). Implementation of these measures would ensure protection of sites that would not require the need to expand law enforcement services and facilities.

This impact would be **less than significant** under Alternative 3.

Alternative 4: Mixed-Light/Indoor License Types Only with Moderate Limits, No Hoop Houses or Outdoor Use Types

Exhibit 2-7 identifies the assumed distribution of new cannabis uses in the County. Alternative 4 assumes the relocation of nine of the 78 existing and eligible cannabis cultivation sites. This alternative also assumes that 75 of the existing and eligible outdoor cannabis cultivation sites would convert entirely to indoor or mixed-light (greenhouse) cultivation. It also assumes the development of 54 new cannabis cultivation and noncultivation uses.

As identified under Alternative 1, there have been cannabis-related crime activities in the County. However, Yolo County has Sheriff officers dedicated solely to crimes related to cannabis. While additional staffing may be required, this should not require construction of additional law enforcement facilities.

Compliance with CLUO performance standards set forth in Section 8-2.1408(KK) and Section 8-2.1410(D) would ensure that law enforcement and safety measures are incorporated into each site. CCR Sections 5042, 5043, 5046, 5047, 40200, and 40205 require on-site security measures. These standards would minimize the potential for criminal activities through controlled access for authorized personnel and locked door requirements at noncultivation sites (CCR Sections 5042 and 5043), security measures that include video surveillance, security personnel, lock and alarm system requirements (CCR Sections 5044, 5045, 5046, and 5047). Manufacturing sites are required to provide a security plan that implements access controls to the building, alarm system requirements and video surveillance (CCR Sections 40200 and 40205). Implementation of these measures would ensure protection of sites that would not require the need to expand law enforcement services and facilities.

This impact would be **less than significant** under Alternative 4.

Alternative 5: All License Types with Moderate Limits, within Agricultural Zones Only, No Retail

Exhibit 2-8 identifies the assumed distribution of new cannabis uses in the County that consists of 52 new cultivation and noncultivation uses (see Table 2-4). Alternative 5 is also assumed to result in the relocation of 30 of the 78 existing and eligible cannabis cultivation sites due to compliance with zoning and buffer standards of the CLUO (see Table 2-5).

As identified under Alternative 1, there have been cannabis-related crime activities in the County. However, Yolo County has Sheriff officers dedicated solely to crimes related to cannabis. While additional staffing may be required, this should not require construction of additional law enforcement facilities.

Compliance with CLUO performance standards set forth in Section 8-2.1408(KK) and Section 8-2.1410(D) would ensure that law enforcement and safety measures are incorporated into each site. CCR Sections 5042, 5043, 5046, 5047, 40200, and 40205 require on-site security measures. These standards would minimize the potential for criminal activities through controlled access for authorized personnel and locked door requirements at noncultivation sites (CCR Sections 5042 and 5043), security measures that include video surveillance, security personnel, lock and alarm system requirements (CCR Sections 5044, 5045, 5046, and 5047). Manufacturing sites are required to provide a security plan that implements access controls to the building, alarm system requirements and video surveillance (CCR Sections 40200 and 40205). Implementation of these measures would ensure protection of sites that would not require the need to expand law enforcement services and facilities.

This impact would be **less than significant** under Alternative 5.

Mitigation Measures

No mitigation is required for any of the alternatives.

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