

## 3.14 TRANSPORTATION AND CIRCULATION

This section describes the applicable federal, state, and local regulations and policies related to transportation and circulation; discusses the existing roadway network and transportation facilities in the County; describes existing transportation and circulation conditions within the County; and analyzes the potential impacts from implementation of the proposed CLUO, including issuance of subsequent Cannabis Use Permits pursuant to the adopted CLUO, on transportation and circulation.

The impact analysis presented in this section is based primarily on the traffic impact analysis (TIA) prepared by KD Anderson & Associates. The TIA is included as Appendix G and provides additional detailed data, modeling, and information related to the transportation and circulation analysis.

Several comment letters pertaining to transportation and circulation were received in response to the notice of preparation. Commenters expressed concern related to potential impacts related to increases in traffic along County Road 89 and County Road 27 associated with cannabis operations. These comments are considered below. Other commenters noted that the speed of traffic and roadway conditions along County Road 49 are of concern as they relate to the potential for increased traffic along this roadway. These issues are not addressed within this section as they are enforcement and maintenance issues, respectively. However, emergency access and hazards due to geometric design are addressed in this section. The reader is referred to Appendix A for comment letters on the Notice of Preparation.

### 3.14.1 Environmental Setting

This section describes the existing environmental setting, which is the baseline scenario upon which project-specific impacts are evaluated. The environmental setting for transportation includes baseline descriptions for roadway, bicycle, pedestrian, and transit facilities.

The following key sources of data and information were used in the preparation of this section:

- Traffic Impact Analysis for Yolo County Cannabis Ordinance (see Appendix G),
- Yolo County 2030 Countywide General Plan (Yolo County 2009a), and
- Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018).

### PROJECT STUDY AREA

The study area was identified based on assumed locations where cannabis activities could occur within the unincorporated area of the County with implementation of the CLUO under each of the five alternatives, and the span of potential project-related impacts beyond that area based on where any potential CEQA impact might occur, including across jurisdictional boundaries. Additionally, identification of the study area included consideration of the project's expected travel characteristics (including number of vehicle trips and directionality of those trips), primary travel routes, mode split, and other considerations. The project study area is consistent with the study area developed for the transportation analysis conducted for the Yolo County 2030 Countywide General Plan EIR.

## ROADWAY NETWORK

Regionally, the unincorporated portions of Yolo County are served by a roadway network consisting of state highways, streets within incorporated cities, rural arterial roads, rural collector roads, and local rural roads. General descriptions of these roadways and their intended function are provided below.

### State Highways

The following state highways in Yolo County include freeways, expressways, and conventional highways that are operated and maintained by the California Department of Transportation (Caltrans):

- State Route (SR) 16,
- SR 45,
- SR 84,
- SR 113, and
- SR 128.

Interstate and U.S. numbered routes are also part of the state highway system and are maintained by Caltrans. Interstate (I-) 80, I-5, and I-505 serve the unincorporated portion of Yolo County. Descriptions of these facilities are listed below:

- I-80 is a principal east/west route in Yolo County serving all of the major population centers within the County including Davis, West Sacramento, Winters and Woodland, and providing connections to the San Francisco Bay Area and Sacramento County. I-80 is a major commute route between residential areas in the greater Sacramento area and the San Francisco Bay Area employment centers and is a major truck route between the San Francisco Bay Area, Sacramento, the Tahoe Basin, and points east. From the Solano County line to the Sacramento County line, I-80 is a six-lane freeway that connects the city of Davis and the city of West Sacramento.
- I-5 is a north/south route in Yolo County and serves as the primary truck route for the transportation of goods. From the Sacramento County line to the Colusa County line, I-5 is a four-lane freeway and provides connections to the city of Woodland and communities of Dunnigan, Zamora, and Yolo.
- I-505 is a north/south freeway which serves as a major connection for goods movement and interregional travel between I-80 near the city of Vacaville and I-5 in the northern part of Yolo County. I-505 is a four-lane freeway from the Solano County line to I-5 and provides a connection to the city of Winters.
- SR 16 serves east-west traffic through the western rural area of Yolo County, including the communities of Rumsey, Guinda, Brooks, Capay, Esparto, Madison, Monument Hills, and the city of Woodland. SR 16 also provides connection to the Cache Creek Casino Resort located near the town of Brooks. North of Rumsey, SR 16 passes through the Cache Creek Regional Park area and is one of the routes used by trucks to access Colusa and Lake Counties. SR 16 extends east as a two-lane conventional highway from the Colusa County line to the Woodland City limits, then north where it connects to I-5.
- SR 113 provides a connection for agricultural and commercial traffic to I-5 and I-80. SR 113 between Davis and Woodland is a four-lane freeway that terminates at I-5. SR 113 continues from I-5 in Woodland as a two-lane conventional highway north to the town of Knights Landing and continues into Sutter County.
- SR 128 serves local traffic in the city of Winters and regional traffic. SR 128 extends as a two-lane conventional highway from the Solano/Napa County line to I-505 in Winters.

Two additional state highways in Yolo County (SR 84 and SR 45) mainly serve local and agricultural traffic within the County. SR 84 (aka Jefferson Blvd) is a two-lane conventional highway that extends from the Solano County line to the West Sacramento City limits providing access to the Clarksburg community. SR 45 is also a two-lane conventional highway that extends from the Colusa County line to Knights Landing.

## COUNTY ROADWAYS

The County maintains an extensive roadway system that provides a high level of access compared to the relatively low levels of traffic on most roadways. Currently, the County maintains approximately 800 miles of roadways in the unincorporated areas.

Major County roads are also part of the regional roadway system and typically provide connections to the highway and freeway systems. County Roads 98 and 102 are roadways that are used by motorists traveling between Davis and Woodland. County Road 31 connects the cities of Davis and Winters. Similarly, Old River Road connects the cities of West Sacramento and Woodland.

The Yolo County circulation system includes numerous County-maintained roads that are not included in the General Plan Circulation Element based on their function. These local roads typically have the primary function of providing access to individual properties and are not regularly used for regional circulation. Many local roads do not fully satisfy current Yolo County design standards for travel way/shoulder width, or for vertical/horizontal alignment. Most are 20–22 feet wide with limited shoulders. Local roads typically carry low traffic volumes (i.e., fewer than 500 vehicles per day) but can also provide truck access to individual properties, particularly in agricultural and aggregate mining areas.

### Level of Service Thresholds

Level of service (LOS) is a qualitative measure describing traffic operating conditions whereby a letter grade, from LOS A to F, is assigned. These grades represent the perspective of drivers and are an indication of the comfort and convenience associated with the driving experience as well as speed, travel time, traffic interruptions and freedom to maneuver a typical vehicle. The LOS thresholds for roadways are based on traffic volume thresholds. LOS does not represent the perspective of other roadway users such as pedestrians, bicyclists, or transit users, and therefore, is not the only measure of roadway performance used by the County. The LOS grades for roadways are described in the County General Plan (p. CI-3) as follows (capacity ranges are identified for each LOS; however, the actual capacity of a roadway depends on the roadway type):

- **LOS A** represents free-flow travel with an excellent level of comfort and convenience and the freedom to maneuver for motorists. LOS A generally represents utilization of less than 30 percent of roadway capacity.
- **LOS B** has stable operating conditions for motorists, but the presence of other vehicles on the road causes a noticeable, though slight, reduction in comfort, convenience and maneuvering freedom for drivers. LOS B generally represents utilization of 30 to 50 percent of roadway capacity.
- **LOS C** has stable operating conditions for motorists, but the operation of individual motorists is substantially affected by the interaction with other vehicles in the traffic stream. LOS C generally represents utilization of 40 to 70 percent of roadway capacity.
- **LOS D** represents high-density but stable flow for motorists, however they will experience severe restriction in speed and freedom to maneuver, with poor levels of comfort and convenience. LOS D generally represents utilization of 60 to 90 percent of roadway capacity.
- **LOS E** represents operating conditions at or near capacity for motorists. Speeds are reduced to a low but relatively uniform value. Freedom to maneuver for motorists is difficult. Unstable operation is frequent and minor disturbances in traffic flow can cause breakdown conditions. LOS E generally represents utilization of 80 to 100 percent of roadway capacity.
- **LOS F** is used to define forced or breakdown conditions for motorists. This condition exists wherever the volume of vehicular traffic demand exceeds the capacity of the roadway. Long queues can form behind these bottleneck points with queued traffic traveling in a stop-and-go fashion.

Analysis of the study area roadway segments was conducted using peak hour volume thresholds consistent with those developed for the Yolo County General Plan EIR and based on the methodology contained in the Highway Capacity Manual. Additionally, the analysis is consistent with the technical approach and protocol established for transportation impact studies and reports in the Yolo County Transportation Impact Study Guidelines (TIS Guidelines) which is based on the current state-of-the-practice in transportation planning and engineering. Table 3.14-1 below presents these volume thresholds.

**Table 3.14-1 Operational Class and Peak Hour Level of Service Thresholds**

Operational Class	Peak Hour Level-of-Service Capacity Threshold (vehicles per hour)				
	A	B	C	D	E
Minor Two-Lane Highway	90	200	680	1,410	1,740
Major Two-Lane Highway	120	290	790	1,600	2,050
Four-Lane, Multilane Highway <sup>a</sup>	1,070	1,760	2,530	3,280	3,650
Two-Lane Arterial	-	-	970	1,760	1,870
Four-Lane Arterial, Undivided	-	-	1,750	2,740	2,890
Four-Lane Arterial, Divided	-	-	1,920	3,540	3,740
Six-Lane Arterial, Divided	-	-	2,710	5,320	5,600
Eight-Lane Arterial, Divided	-	-	3,720	7,110	7,470
Two Freeway Lanes <sup>a</sup>	1,110	2,010	2,880	3,570	4,010
Two Freeway Lane + Auxiliary Lane <sup>a</sup>	1,410	2,550	3,640	4,490	5,035
Three Freeway Lanes <sup>a</sup>	1,700	3,080	4,400	5,410	6,060
Three Freeway Lanes + Auxiliary Lane <sup>a</sup>	2,010	3,640	5,180	6,350	7,100
Four Freeway Lanes <sup>a</sup>	2,320	4,200	5,950	7,280	8,140

<sup>a</sup>. LOS capacity threshold is for one direction.

- LOS is not achievable because of type of facility.

Source: KD Anderson & Associates 2019

### Traffic Operations

Roadway segments LOS analysis was conducted as part of the traffic impact analysis for the proposed CLUO prepared by KD Anderson & Associates and is summarized below and included in Appendix G.

The study area roadway segments and associated LOS under existing conditions during the p.m. peak hour are shown in Table 2 in Appendix G. LOS was determined by comparing traffic volumes for the study area roadway segments with peak hour LOS capacity thresholds set forth in General Plan Policy CI-3.1 (see Section 3.14.2, “Regulatory Setting,” for further discussion of General Plan circulation policies). The majority of evaluated roadway segments operate at LOS A, B, or C under existing conditions, which represent acceptable operating conditions. However, the three study area roadway segments listed below experience p.m. peak hour volumes that result in unacceptable LOS:

- County Road 102 between Covell Boulevard and County Road 29: LOS D
- County Road 102 between County Road 29 and County Road 27: LOS D
- County Road 102 between County Road 17 and SR 113: LOS D

General Plan Policy CI-3.1(U) and (V) state that once passing lanes and intersection improvements are implemented the resulting LOS threshold would go from LOS C to LOS D for the segments of County Road 102 from Covell Boulevard to County Road 27, and from LOS D to LOS E for the segment from County Road 17 to SR 113. However, funding for these improvements is not certain and these improvements have not been identified in an adopted capital improvement program, therefore, LOS C remains the applicable LOS

threshold. This operation condition is the result of business and other commuter traffic using County Road 102 to travel between the City of Davis and the City of Woodland.

**Vehicle Miles Traveled**

State CEQA Guidelines Section 15064.3 was added in December 2018, to address the determination of significance for transportation impacts. It directs that a project’s effects on automobile delay (such as LOS) may no longer be considered a threshold for project transportation impacts, and further directs that vehicle miles traveled (VMT) is generally the most appropriate measure of transportation impacts. This change is the result of legislation (SB 743) and is intended to change the focus from congestion to, among other things, reduction in greenhouse gas emissions, encouraging mixed use development, and other factors.

Pursuant to CEQA Guidelines Section 15064.3(c) this change in analysis may be implemented now and is mandated to be used beginning July 1, 2020. Because this ordinance will apply to applications received after the date on which VMT is required to be considered, VMT is used as the primary metric for analyzing transportation impacts in this EIR.

VMT is a metric that counts the number of miles traveled by motor vehicles that are generated by or attracted to a project. VMT captures motorized trip generation rates, thereby accounting for the effects of project features and surroundings. It also captures trip length, and so can also account for regional location, which is an important determinant of vehicle travel. A “VMT” is one vehicle traveling on a roadway for one mile. Regardless of how many people are traveling in the vehicle, each vehicle traveling on a roadway generates one VMT for each mile it travels. VMT modeling was conducted for the purposes of this EIR, and VMT is estimated and projected for a typical weekday. Table 3.14-2 presents an estimate of VMT in Yolo County and the Sacramento Area Council of Governments (SACOG) six-county area as a whole between the years of 2005 and 2012.

**Table 3.14-2 Average Daily Vehicle Miles Traveled**

Year	Yolo County VMT	SACOG Area VMT
2005	5,683,000	54,572,000
2008	5,489,000	53,859,000
2012	5,710,000	55,148,000

Note: VMT = vehicle miles traveled.  
 Source: KD Anderson & Associates 2019

**TRANSIT SYSTEM**

The Yolo County Transportation District operates YOLOBUS, which offers local fixed routes within Woodland and West Sacramento and intercity routes serving Davis, West Sacramento, Winters, Woodland, downtown Sacramento, Sacramento International Airport, Capay, Dunnigan, Esparto, Madison, Yolo, Knights Landing, Vacaville, and Cache Creek Casino.

The district also operates the following curb-to-curb dial-a-ride services:

- local service for persons with disabilities in Woodland;
- local service and to medical appointments in Sacramento for West Sacramento seniors and persons with disabilities; and
- intercity service between the communities of Winters, Woodland, Davis, West Sacramento, Sacramento International Airport, and downtown Sacramento.

Davis Community Transit operates origin-to-destination Dial-a-Ride service for persons with disabilities within the city of Davis.

Commercial bus service is provided by Greyhound through limited service bus stops in Davis and Woodland. These limited service bus stops provide connections to full-service stations located in the San Francisco Bay Area and the greater Sacramento area. Amtrak also provides commercial bus service at the downtown Davis train station. There are no Greyhound bus stops within the unincorporated portions of Yolo County.

Yolo Commute provides ridesharing information and programs that operate within Yolo County and to/from surrounding areas. Additionally, Yolo County has four park-and-ride facilities: three along I-80 (in West Sacramento and Davis) and one near I-505 in the city of Winters.

## Passenger Rail

Amtrak offers daily round-trip train service from the downtown Davis train station to the San Francisco Bay Area and to downtown Sacramento. Trains that stop in Davis include the Coast Starlight (one daily round trip), California Zephyr (one daily round trip), and the Capitol Corridor (15 weekday round trips and 11 weekend round trips). The Capitol Corridor Joint Powers Authority is an intercity passenger train system that provides service between San Jose, Oakland/San Francisco, and Sacramento/Placer County along a 170-mile rail corridor, including stops in Davis.

## Freight Rail

Yolo County is served by three freight railways including Union Pacific Railroad, Sierra Northern Railroad, and California Northern. The Union Pacific operates a railroad line connecting Davis to West Sacramento and provides services within the Port of Sacramento. The Sierra Northern Railroad operates a railroad line that runs from West Sacramento to Woodland (approximately 16 miles long) known as the Sacramento River Train. California Northern operates a 110-mile-long railroad line that runs from the city of Davis in Yolo County to the town of Tehama near Red Bluff.

## EXISTING BIKE AND PEDESTRIAN FACILITIES

The bicycle and pedestrian transportation system in Yolo County is composed of local and regional bikeways and trails. Yolo County provides favorable bicycling conditions due to its flat terrain, mild climate, and relatively short distance between cities. In addition, the city of Davis and University of California, Davis, have an extensive network of bicycle facilities with good connections to the County bicycle network.

Bikeways are classified into the following three types:

- Class I – off-street bike paths,
- Class II – on-street bike lanes marked by pavement striping, and
- Class III – on-street bike routes that share the road with motorized vehicles.

The following five major bikeways exist within the unincorporated areas of Yolo County:

- Class I path along I-80 and Russell Boulevard, and Class II bike lanes along County Road 32A;
- Class II bike lanes along County Road 102 from Knights Landing to eastern Woodland and on to nearby Davis;
- Class II bike lane along County Road 99 from the southern City limit of Woodland south to County Road 29, then east 1 mile to County Road 99D, then south on County Road 99D to the city of Davis;

- Class II bike lane along County Road 31, County Road 93A and Russell Boulevard between Davis and Winters; and
- Class I bike path along County Road 32 west from Davis to County Road 95A.

Additionally, the County has developed a Parks and Open Space Master Plan (Yolo County 2006) that includes descriptions and resources of hiking trails within the unincorporated parts of the County. The County also has an additional evolving system of trails along Lowe Cache Creek associated with the Cache Creek Area Plan. On April 9, 2019, the Board of Supervisors accepted the Cache Creek Parkway Plan Open Space Inventory and Baseline Improvements document released December 2018.

### 3.14.2 Regulatory Setting

#### FEDERAL

There are no federal laws or regulations addressing transportation and circulation that are relevant to the project.

#### STATE

##### California Department of Transportation Concept Reports

Caltrans has completed transportation concept reports (TCRs) or route concept reports for I-5, I-80, I-505, SR 16, SR 45, SR 84, SR 113, and SR 128. These reports identify long-range improvements and establish the concept, or desired LOS for specific corridor segments. These reports identify long-range improvements needed to adequately serve 20-year traffic forecasts. Additionally, the reports identify the ultimate design concept for conditions beyond the immediate 20-year design period.

##### Interstate 5 Transportation Concept Report

The I-5 TCR (Caltrans 2017a) identifies the 20-year concept (through 2035) for the corridor as maintaining the existing four-lane freeway from the Yolo/Sacramento County line to the Yolo/Colusa County line. Future improvements within the horizon period consist of maintenance and roadside safety projects and includes a bridge vertical clearance project at County Road 103. In the “ultimate facility,” construction of bus/carpool lanes from the Sacramento County line to SR 113 and Intelligent Transportation System elements (e.g., ramp meters, variable messaging signs) are proposed. Caltrans has established an ultimate concept of LOS D for I-5 from the Sacramento County line to County Road 102, LOS E from County Road 102 to SR 113, LOS D/E from SR 113 to I-505 and LOS D north of SR 505 through Yolo County.

##### Interstate 80 Transportation Concept Report

The I-80 TCR (Caltrans 2017b) identifies the 20-year concept and ultimate facility for the corridor as widening the existing six lanes through Yolo County (including the Yolo Causeway) to include high-occupancy vehicle lanes in both directions. The concept also includes increasing transit service and implementing traffic operation systems such as ramp metering and changeable message signs along the corridor. Caltrans has established a concept of LOS E for I-80 through Yolo County. In addition to the concept report, a Corridor System Management Plan focuses on the integrated management of travel modes and roadways to facilitate the efficient and effective mobility of people and goods within California’s most congested transportation corridors. This document identifies the addition of high-occupancy vehicle lanes between Mace Boulevard (in Davis) and Enterprise Drive (in West Sacramento) along I-80 in both directions.

##### Interstate 505 Transportation Concept Report

The I-505 TCR (Caltrans 2017c) identifies the 20-year concept and ultimate facility for I-505 as maintaining the existing four-lane freeway.

**State Route 16 Transportation Corridor Concept Report**

The SR 16 Transportation Corridor Concept Report (Caltrans 2012a) identifies the 20-year concept and ultimate facility for SR 16 as maintaining the existing two-lane conventional highway with the addition of passing lanes, left-turn lanes, and bicycle facilities in some sections where feasible. The segment of SR 16 from County Road 21A to I-505 has a two-lane concept. Caltrans has established a concept of LOS D for SR 16 between the Yolo/Colusa County line and County Road 85B, and LOS E from County Road 85B to I-5.

**State Route 45 Transportation Concept Report**

The SR 45 TCR (Caltrans 2014a) contains the 20-year improvement concept for SR 45. Through Yolo County the concept is LOS D. The concept and ultimate facility would maintain the existing two-lane roadway.

**State Route 84 Transportation Corridor Concept Report**

The SR 84 Transportation Corridor Concept Report (Caltrans 2012b) contains the 20-year improvement concept for SR 84. The ultimate concept is LOS D, and no improvements other than routine maintenance are planned for this route.

**State Route 113 Transportation Concept Report**

The SR 113 TCR (Caltrans 2014b) contains the 20-year improvement concept for SR 113. The concept facility for the section between I-80 and I-5 is to maintain the existing four-lane freeway. North of I-5 the concept facility remains a two-lane conventional highway. The ultimate concept LOS from the Solano County line to I-5 is LOS E, while north of I-5 the concept is LOS D.

**Draft State Route 128 Transportation Concept Report**

The Draft SR 128 TCR (Caltrans 2017d) contains the 20-year improvement concept for SR 128. The concept facility for the roadway is to maintain the existing two-lane highway. The 20-year concept LOS from the Solano County line to County Road 87E is LOS D, while the concept from County Road 87E to the I-5 is LOS E.

**California Department of Transportation Statewide Transportation Improvement Program**

The California Statewide Transportation Improvement Program (STIP) is a multiyear, statewide, intermodal program of transportation projects that is consistent with the statewide transportation plan and planning processes, and metropolitan plans. The STIP is prepared by Caltrans in cooperation with the Metropolitan Planning Organizations and Regional Transportation Planning Agencies. The STIP contains all capital and noncapital transportation projects or identified phases of transportation projects for funding under the Federal Transit Act and Title 23 of the U.S. Code.

**California Department of Transportation Interregional Transportation Improvement Program**

Caltrans's 5-year Interregional Transportation Improvement Program is prepared pursuant to Government Code 14526, Streets and Highways Code Section 164, and the California Transportation Commission's STIP Guidelines. Regional agencies work with Caltrans to identify projects that will address improvements to the interregional transportation system and improve the movement of people, vehicles, and goods between regions.

**REGIONAL****Sacramento Area Council of Governments**

SACOG is an association that includes the Counties of El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba, as well as 22 cities, including the Cities of Davis, West Sacramento, Winters, and Woodland. As a metropolitan transportation organization, SACOG is required to prepare a long-range transportation plan for all modes of transportation—including public transit, automobile, bicycles, and pedestrians—every 4 years for the six-county area.

**Metropolitan Transportation Plan/Sustainable Communities Strategy**

SACOG is responsible for the preparation of, and updates to, the 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and the corresponding Metropolitan Transportation



Improvement Program (MTIP) for the six-county Sacramento region (SACOG 2016). In response to this requirement, SACOG completed the MTP/SCS 2035. The purpose of the MTP/SCS 2035 is to establish regional access and identify mobility goals; identify present and future transportation needs, deficiencies, and constraints within the transportation system; analyze potential solutions; estimate available funding; and propose investments. On February 18, 2015, the SACOG Board of Directors adopted the 2016 update to the MTP/SCS. The draft proposed 2020 MTP/SCS and related Draft EIR were released late September 2019 and are scheduled for adoption no later than February 2020.

The Congestion Management Process (CMP) and MTP/SCS are developed as a single integrated document. As part of the MTP/SCS, SACOG's CMP addresses the six-county Sacramento region and the transportation network therein. The CMP focuses on travel corridors with significant congestion and critical access and mobility needs to identify projects and strategies that meet CMP objectives.

Transportation projects are nominated by local agencies and analyzed against community priorities identified through public outreach as well as technical performance and financial constraints. The output of the MTP and CMP is a list of projects with identified lead agencies and completion years, contained in Appendix A-1 of the MTP/SCS. The adopted list and schedule of projects for the MTP/SCS then informs the development of the MTIP, described in more detail below.

### **Metropolitan Transportation Improvement Program**

SACOG, the federally designated metropolitan planning organization for the region, prepares and adopts the MTIP approximately every 2 years. The MTIP is a short-term listing of surface transportation projects that receive federal funds, are subject to a federally required action, or are regionally significant. SACOG adopted the 2019/20 MTIP in September 2018 (SACOG 2018). The 2019/20 MTIP covers 4 years of programming: federal fiscal years 2019–2022. The project listing (Appendix G) provides a detailed description for each individual project in the 2019/20 MTIP, including those for Yolo County.

### **Regional Bicycle, Pedestrian and Trails Master Plan**

SACOG approved the *Regional Bicycle, Pedestrian, and Trails Master Plan* in April 2015. It envisions a complete transportation system that supports healthy living and active communities where bicycling and walking are viable and popular travel choices in a comprehensive, safe, and convenient network. The *Regional Bicycle, Pedestrian, and Trails Master Plan* is intended to guide the long-term decisions for the Bicycle and Pedestrian Funding Program. The projects included in this plan are regionally significant projects that require at least partial regional funding. This plan is not funding-constrained, so it contains at least 20 years' worth of projects. As part of a Master Plan update in spring 2018, SACOG finalized an update to the planned and existing bikeway networks for use in the Project Performance Assessment data tool, a tool developed by SACOG to be used to analyze transportation investments at the project level.

## **LOCAL**

### **Yolo County 2030 Countywide General Plan**

The vision for Yolo County as set forth in the General Plan is to remain an area of active and productive farmland and open space where both traditional and innovative agricultural practices will continue to flourish in the countryside, while accommodating the recreational and tourism needs of residents and visitors (Yolo County 2009a). The Vision and Principles section of the General Plan contains principles and objectives related to transportation and relevant to the project. A summary of these policies is provided below.

- **Principle 1:** The success of Yolo County depends upon the success of agriculture.
  - **Objective 1.3:** Safe and efficient transportation system for moving products from farm to market.
- **Principle 5:** The safest and most efficient way to move goods and people is through a variety of transportation alternatives.

- **Objective 5.10:** Efficient and safe circulation for agricultural equipment.
- **Objective 5.11:** Efficient and safe routes to markets for transporting agricultural goods.

The Circulation Element of the General Plan contains various policies related to transportation potentially relevant to the project. A summary of these policies is provided below. It is noted that some policies directly address a VMT threshold; however, these policies apply to development of new planned communities, most of which have been removed from the General Plan, and although the policies remain, they are not directly applicable because they specifically apply within specific plan areas.

- **Policy CI-1.3:** Reduce the total vehicle miles of travel (VMT) per household by making efficient use of existing transportation facilities and by providing for more direct routes for pedestrians and bicyclists through the implementation of “smart growth” and sustainable planning principles.
- **Policy CI-2.2:** Encourage employers (including the County) to provide transit subsidies, bicycle facilities, alternative work schedules, ridesharing, telecommuting and work-at-home programs, employee education and preferential parking for carpools/vanpools.
- **Policy CI-3.1** Maintain Level of Service (LOS) C or better for roadways and intersections in the unincorporated county. In no case shall land use be approved that would either result in worse than LOS C conditions, or require additional improvements to maintain the required level of service, except as specified below. The intent of this policy is to consider level of service as a limit on the planned capacity of the County’s roadways.

Bullets A. through W. under this policy identify and detail additional LOS standards that apply to specific roadway segments within the County.

X. Additional exceptions to this policy may be allowed by the Board of Supervisors on a case-by-case basis, where reducing the level of service would result in a clear public benefit. Such circumstances may include, but are not limited to, the following:

1. Preserving agriculture or open space land;
2. Enhancing the agricultural economy;
3. Preserving scenic roadways/highways;
4. Preserving the rural character of the county;
5. Avoiding adverse impacts to alternative transportation modes;
6. Avoiding growth inducement; or
7. Preserving downtown community environments.
8. Where right-of-way constraints would make the improvements infeasible.

- **Policy CI-3.18:** Ensure adequate access for emergency vehicles.
- **Policy CI-3.20:** Achievement of the VMT threshold shall be measured based on the build-out of the plan area phases using a travel demand forecasting model that is sensitive to built environment variables including but not limited to the 4Ds (density, diversity, design, and destination).
- **Policy CI-3.21:** Other Specific Plan areas allowed under the General Plan shall strive to achieve the VMT threshold of 44 miles generated per household per weekday to the extent feasible, using the same methods described above.
- **Policy CI-3.3:** CEQA review for subsequent projects will analyze project traffic and circulation impacts using both the Yolo County General Plan policies and Caltrans policies (based on the CSMPs, TCCRs, or other guidelines) as applicable.

- **Policy CI-3.6:** Incorporate the concept of “complete” streets<sup>1</sup> which requires more complete consideration of all users of the street. Develop roadway cross-sections for community and rural areas, addressing the following factors as applicable: number of travel lanes, lane width, medians, drainage control, shoulder width, parking lanes, bike lanes, fire and emergency response standards, curb and gutter design, landscaped strip and sidewalk width. In general it is intended that roadway cross-sections in the county be as narrow as possible (particularly in community areas) while still meeting recommended safety standards, the requirements of the General Plan, and the needs of users.
- **Policy CI-3.9:** To the greatest feasible extent, require new development to construct safety improvements consistent with current design standards on existing roadways that are anticipated to accommodate additional traffic from planned development.
- **Policy CI-3.11:** Require new development to finance and construct all off-site circulation improvements necessary to mitigate a project’s transportation impacts (including public transit, pedestrian and bicycle mobility, safety and level of service-related impacts, and impacts to the State Highway System). For mitigation to be considered feasible, it must be consistent with the policies of the General Plan.
- **Policy CI-3.12:** Collect the fair share cost of all feasible transportation improvements necessary to reduce the severity of cumulative transportation impacts (including public transit, pedestrian and bicycle mobility, safety and level of service-related impacts).
- **Policy CI-3.13:** Ensure that transportation and circulation improvements (including improvements to comply with County design standards) are constructed and operational prior to or concurrent with the need, to the extent feasible.
- **Policy CI-4.2:** Support regional air quality and greenhouse gas objectives through effective management of the county’s transportation system.

### Yolo County Bicycle Transportation Plan

The purpose of the *Yolo County Bicycle Transportation Plan* approved in March 2013 is to formulate a long-range, comprehensive, and consistent policy guide for achieving a countywide bikeway network, and list current priorities for bicycle facility development. The plan sets forth goals and policies for bicycle facilities in the unincorporated County in response to identified needs. The plan provides a viable system of bike routes that when constructed will encourage and promote more bicycle riding. Because of the uncertainty of funding, this plan does not contain funding or construction schedules. Specific policies and suggested actions are described and routes are prioritized as guides for future action. This plan has been reviewed for consistency with bicycle planning documents prepared by the Cities of Davis, West Sacramento, Winters, and Woodland; Solano County; and the City and County of Sacramento. Specific policies and suggested actions are described, and routes are prioritized as guides for future action.

### County of Yolo Transportation Impact Study Guidelines

The Yolo County TIS Guidelines have been developed to provide a clear and consistent technical approach to transportation impact analysis for projects within Yolo County’s jurisdiction and establishes protocol for transportation impact studies and reports based on the current state-of-the-practice in transportation planning and engineering (Yolo County 2010). Individual projects under the CLUO would be required to demonstrate consistency with the Yolo County TIS Guidelines.

In general, a TIS is required when any one of the following conditions is met:

- The project has the potential to create a significant environmental impact under CEQA.
- The proposed project has the potential to generate 100 new passenger vehicle trips per day or an equivalent number of truck trips.

- The project requires a permit application, which is subject to discretionary approval.
- The project would substantially alter physical or operational conditions on a County roadway, bikeway, sidewalk, or other transportation facility.

### 3.14.3 Environmental Impacts and Mitigation Measures

#### METHODS AND ASSUMPTIONS

This transportation impact analysis considers existing transportation facilities and operations as documented in Section 3.14.1, “Environmental Setting” and traffic impact analysis provided in Appendix G. The analysis uses General Plan policies related to County transportation systems and agricultural uses. The analysis also evaluates whether implementation of the proposed CLUO, including issuance of subsequent Cannabis Use Permits pursuant to the adopted CLUO, could result in increased transportation impacts.

#### Consistency with General Plan Circulation Policies Methodology

The evaluation of potential impacts related to transportation is based on a review of existing transportation facilities and conditions, anticipated future facilities, and transportation-related plans and policies relevant to implementation of the CLUO and permitted future cannabis uses. Due to the countywide scope of the CLUO and because the exact locations of all future commercial cannabis operations are not known at this time, the analysis does not evaluate specific intersections. The traffic operations addresses roadway segments representative of the County’s overall transportation network and whether implementation of the CLUO under the assumed extent of cannabis uses for EIR analysis purposes under the five alternatives would conflict with General Plan circulation policies, including roadway capacity. The segments analyzed for the purpose of this analysis were developed for the Yolo County General Plan EIR based on a series of links with common physical and traffic conditions. Details regarding the traffic operations is provided in Appendix G.

#### VMT Significance Threshold Methodology

##### State CEQA Guidelines Section 15064.3

State CEQA Guidelines Section 15064.3, added to address the requirements SB 743, is intended to change the focus from congestion to, among other things, reduction in greenhouse gas emissions, encouraging mixed use development, and other factors.

State CEQA Guidelines Section 15064.3(b) identifies four criteria for analyzing the transportation impacts of a project. To determine how the CLUO should be considered, each of the criteria is discussed below:

- Section 15064.3(b)(1) addresses land use projects. The proposed project is a new ordinance regulating cannabis activities and operations within unincorporated Yolo County. The proposed CLUO would establish a use permit process for cannabis which would not apply to other agricultural crops in Yolo County. The proposed project does not involve a conversion to other land uses as presumed to be envisioned by this section of the CEQA Guidelines but rather would apply to otherwise allowed land uses (e.g., agriculture, retail sales, manufacturing) that would involve cannabis. Section 15064.3(b)(1) describes that projects with specified proximity to “major” or “high quality” transit should be presumed to cause a less than significant transportation impact. The unincorporated area of Yolo County does not have transit service that meets these criteria and therefore this presumption would not apply to projects regulated under the CLUO. This section does not apply to the proposed CLUO. This section describes that projects which would decrease VMT in the project area as compared to existing conditions should also be presumed to have a less than significant effect. Future individual projects seeking Cannabis Use Permits pursuant to the CLUO may be subject to this criterion (as described below).

- Section 15064.3(b)(2) addresses Transportation Projects. The proposed project is a set of proposed land use regulations for all cannabis activities and operations within unincorporated Yolo County. As such it does not fall within this category of “transportation projects.” This section does not apply.
- Section 15064.3(b)(3), Qualitative Analysis, explains that there may be conditions under which a qualitative rather than quantitative analysis of VMT is appropriate. Table 9 of Appendix G attempts to provide quantified estimates of VMT associated with implementation of the CLUO. As described in the VMT quantification methodology discussion below, SACSIM and CalEEMod models cannot accurately measure VMT for this project and therefore a qualitative analysis was conducted. Because a quantitative method was found to be infeasible this EIR relies on a qualitative analysis of VMT.
- Section 15064.3(b)(4), Methodology, explains that the County has discretion to choose the most appropriate methodology to evaluate VMT subject to other applicable standards such as CEQA Guidelines Section 15151 (standards of adequacy for EIR analyses).

In support of CEQA Guidelines Section 15064.3, OPR has issued a Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018). The OPR Technical Advisory outlines recommended procedures and methods for evaluating transportation impacts for residential, office, and retail projects. However, it does not offer guidance for a programmatic project like the subject CLUO which would implement a new set of proposed land use regulations for cannabis activities and operations within unincorporated Yolo County. Residential, office, and retail land uses, which are the focus of the OPR Technical Advisory, are governed by the General Plan (Yolo County 2009a) with which the CLUO is consistent, and County Zoning Regulations, within which the CLUO would be incorporated.

The OPR Technical Advisory notes by way of background (page 2) that there are three primary ways of reducing GHG emissions for the transportation sector: increasing vehicle efficiency, reducing fuel carbon content, and reducing the amount of vehicle travel. Local jurisdictions are not able to influence or control the first two, but through careful land use planning local governments can ensure reductions in vehicle travel. The OPR Technical Advisory highlights the relationship between reduction of VMT and reduction of GHG emissions, which is a key component of SB 743.

Additionally, the OPR Technical Advisory notes that some local agencies have developed screening thresholds to indicate when detailed analysis is needed and includes recommendations related to VMT screening thresholds for small projects. The OPR Technical Advisory states that absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with an SCS or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact (OPR 2018). This EIR is a programmatic EIR that looks at the combined effect of assumed future cannabis operations under the CLUO; thus, this EIR does not rely on this screening threshold. It is noted that the Yolo County TIS Guidelines state that a proposed project that has the potential to generate 100 new passenger vehicle trips per day or an equivalent number of truck trips would require a project-specific transportation impact study. Therefore, any individual projects under the CLUO that would not require a project-specific transportation impact study based on requirements within the Yolo County Transportation Impact Study Guidelines would also be assumed in project-level CEQA documents, using OPR guidance, to result in a less than significant VMT impact.

Thus, taking into consideration the four criteria detailed in Section 15064.3(b) for analyzing the transportation impacts and their applicability to the CLUO, state policy, and the recommendations of the OPR Technical Advisory, the following threshold was determined as conservative but appropriate for the purpose of analyzing the potential for change in VMT under each CLUO alternative:

- An increase in countywide VMT as compared to existing conditions shall be presumed to result in a significant effect.

## VMT Quantification Efforts

The following describes the evaluation process used to determine whether a transportation model could be used to accurately quantify changes in VMT from the assumed extent of cannabis uses identified in the CLUO alternatives evaluated in the EIR. As further described below, the SACOG SACSIM travel demand model and CalEEMod model were rejected due to concerns regarding accuracy.

### SACSIM Model

Modeling and analysis of VMT under the CLUO and the associated alternatives herein examine the net effect of the CLUO in terms of total daily VMT (i.e., VMT associated with full buildout of each alternative). Thus, the analysis looks at the combined effect on total daily VMT under each alternative, and accounts for changes to travel patterns resulting from the new employment opportunities created by cannabis uses assumed under the five CLUO alternatives. Change in employment associated with the CLUO is used to assess the transportation-related effects of the CLUO because employment is the primary trip generating unit used by the SACSIM model to estimate VMT for the industrial and retail land use categories.

The OPR Technical Advisory presents various metrics for analyzing VMT, including total VMT, VMT per capita, and VMT per employee. The VMT per capita/per employee metrics are most applicable to projects that involve a single site and a single type of land use. However, the CLUO alternatives assume multiple sites and multiple types of land uses. Thus, total VMT is performance metric used in this EIR because it more accurately captures the totality of the effect of the various cannabis uses assumed under the CLUO alternatives on VMT.

CEQA Guidelines Section 15144 addressing forecasting states that while foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can. Within the study area the current version of the SACOG SACSIM travel demand model is recognized as the best available tool for accounting for all aspects of travel associated with various land uses. The model takes into consideration the following factors:

- land use intensity,
- land use location,
- interaction between land uses throughout the model area, and
- quality of access to the roadway network.

The SACSIM model addresses travel within the six-county area composed of Yolo, Sacramento, Placer, El Dorado, Yuba, and Sutter Counties. Although the SACSIM model's inventory of land uses does not include agricultural employment (i.e., the land use that would most closely approximate the trip generation and VMT of cannabis uses associated with cultivation), it does include industrial uses. Similar to agricultural land uses, the travel patterns associated with the industrial land use category would account for employee commute travel but would also reflect regional deliveries of materials and products. Due to the relatively similar travel characteristics between agricultural and industrial land uses, the trip generation characteristics of industrial land uses were applied to cultivation operations and nursery facilities for the purposes of this analysis. Additionally, the SACSIM industrial land use type was assigned to the processing, manufacturing, testing, and distribution facilities under the CLUO. The SACSIM retail land use category was assigned to the retail cannabis uses under the CLUO, and a combination of the SACSIM industrial and retail land use categories (i.e., two-thirds industrial and one-third retail) was assigned to the CLUO micro business land uses.

The SACSIM travel demand model forecasts the amount of travel by estimating vehicle trips between geographic units. These geographic units include traffic analysis zones (TAZs). The size of TAZs vary from model to model and area to area. However, to provide a general idea of the size of TAZs in the SACSIM model, approximately 30 TAZs are used to characterize the Davis area. The model estimates the mix of land use types within each TAZ in a model area, and this land use data is then used to estimate the number of trips to and from each TAZ. The origin of trips from each TAZ in the model are matched with a destination in other TAZs and the travel between all TAZs is calculated to estimate VMT.

While most existing and eligible cannabis cultivation sites would remain in their current locations, some of the existing sites are assumed to relocate to comply with zoning and buffering standards under CLUO (depending on the alternative). However, due to the size of the TAZs built in to the SACSIM travel demand model, it is assumed that any existing cannabis cultivation site that would potentially be relocated would move to a location within the same TAZ. Therefore, based on this assumption and the method by which the SACSIM travel demand model estimates VMT, the relocation of existing cannabis cultivation sites would not affect the calculated VMT estimates.

### **Travel Outside of SACOG Region**

The OPR Technical Advisory states that lead agencies should not truncate any VMT analysis because of jurisdictional or other boundaries, for example, by failing to count the portion of a trip that falls outside the jurisdiction or by discounting the VMT from a trip that crosses a jurisdictional boundary (OPR 2018). For this reason, where methodologies exist to estimate the full extent of VMT from a project, they should be applied.

Because the SACSIM model does not account for travel outside of its six-county area in its VMT calculation, off-model adjustments were made to the SACSIM model outputs for each alternative to ensure that the VMT was not truncated as described above. The off-model adjustments were based on census data and characteristics for employee travel generated by Yolo County. It was assumed that each alternative's net effect on total VMT outside of the SACSIM area would be 34 percent of the effect of each alternative on internal VMT. For additional details related to VMT quantification methods see Appendix G.

### **Model Limitations**

Travel forecasting models (such as the SACSIM model) generally use residential land uses to estimate the number vehicle trips, and nonresidential land uses to estimate where the trips would go. Additionally, as noted above, the SACSIM model does not include the agricultural land use or employment category; therefore, it is not designed to directly analyze the effects of new agricultural land uses and the associated increase employment on VMT. As a result, the land use employment categories detailed above (i.e., industrial and retail) were used as representative land uses to analyze the cannabis operations and nursery facilities allowed under the CLUO in order to attempt to quantify changes in VMT. Although the industrial and retail land uses are those within the SACSIM model that would most closely approximate the trip generation and VMT of cannabis operations and nursery facilities, they are forecasting tools that do not precisely capture the trip generation, distribution, and assignment characteristics of cannabis operations allowed under the CLUO.

SACSIM was used to model the net VMT change under each of the alternatives. Detailed VMT modeling details and results are provided in Table 9 of Appendix G. While the modeling did identify changes in VMT, results were nominal and were within the typical forecasting errors of these model types. Further the SACSIM model is not designed to factor the proximity of cannabis cultivation and noncultivation uses that are assumed in the EIR analysis for alternatives 2 through 5. The provision of a range of cultivation and noncultivation operations within the unincorporated area of the County would reduce VMT generated as compared to traveling to cities and/or outside the County for commercial nurseries, testing, manufacturing, and retail uses. Due to the limitations of the SACSIM model as detailed above, and in the absence of relevant studies and data, the SACSIM model cannot accurately measure VMT for this project.

### **CalEEMod**

The OPR Technical Advisory identifies sketch models such as CalEEMod as potential tools that could be used to estimate VMT. CalEEMod calculates VMT by simply multiplying the number of trips generated by individual land uses by trip length. The default trip generation rates used by the program are ITE Trip Generation rates, and trip lengths are based on data supplied by the air districts or an average trip length for the state as a whole.

The specific cannabis use types that could be developed under the CLUO (i.e., commercial nurseries, processing, distribution, testing, manufacturing, microbusiness, and retail uses) are not contained within the ITE Trip Generation Manual. Similar to the concerns described above for the SACSIM model, cannabis uses could potentially be assigned to land uses contained within the ITE Trip Generation Manual with similar travel characteristics. However, using proxy land uses would not precisely capture the unique trip generation

characteristics of cannabis uses. The application of a regional or state average trip lengths would not necessarily capture the trip length characteristics cannabis uses.

Also, CalEEMod does not factor the proximity of cannabis cultivation and noncultivation uses that are assumed in alternatives 2 through 5. As explained above for the SACSIM model, the potential provision of a range of cultivation and noncultivation use within the unincorporated area of the County is expected reduce VMT generated as compared to traveling to cities and/or outside the County for cannabis supporting uses (e.g., commercial nurseries, processing, distribution, testing, manufacturing, microbusiness, and retail uses). Because CalEEMod does not account for how mutually supportive land use relationships would affect trip generation or length, and in the absence of relevant studies and data, using CalEEMod to model VMT would not provide an accurate estimate for this project.

## THRESHOLDS OF SIGNIFICANCE

Thresholds of significance are based on Appendix G of the State CEQA Guidelines, the General Plan, the County Transportation Impact Study Guidelines, and professional judgment. The following identifies the significance criteria used to assess impacts on the transportation and circulation system from implementation of the project.

### General Plan Consistency

Impacts on the roadway system would be significant if the project would:

- conflict with a program, plan, ordinance, or policy addressing the circulation system.

### VMT

As described above, impacts on VMT would be significant if the project would:

- conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision(b).

As described in Section 3.0, “Approach to the Environmental Analysis,” implementation of the CLUO would not result in the conflicts with bicycle, pedestrian, and transit transportation systems; would not create transportation safety hazards; and would not adversely affect emergency access. Therefore, these impact issue areas are not further evaluated.

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

## IMPACT ANALYSIS

### Impact TRANS-1: Conflict with Program, Plan, Ordinance or Policy Addressing the Circulation System

Adoption and implementation of the proposed CLUO, including issuance of subsequent Cannabis Use Permits pursuant to the adopted CLUO could result in additional traffic on County roadways. This increase in traffic and use of County transportation facilities would not conflict with the General Plan transportation policies. This impact would be **less than significant** for all alternatives.

A stated objective of the General Plan is to combine minimum efficient urbanization with the preservation of productive farm resources and open space amenities (Yolo County 2009a). Yolo County is dedicated to protecting and enhancing its rich agricultural soils and farming economy by directing residential growth to established cities and rural communities. Specific overarching principles and objectives within the General Plan strive to emphasize the provision of efficient transportation system for agricultural uses, and safe and efficient circulation for the agricultural equipment and goods. Thus, the intent of the General Plan and its



associated principles, objectives, and policies related to transportation in the County is to focus growth in the existing incorporated cities and towns in order to preserve roadway capacity along the County roadway network to ensure the efficient transportation of agricultural goods and equipment.

The Circulation Element of General Plan establishes LOS policies for roadways and intersections in the unincorporated portion of Yolo County. Changes in traffic operations associated with the implementation of the CLUO, based on the assumptions associated with each of the five project alternatives is shown in Section 3.14.1, “Environmental Setting,” and contained in Table 6 of Appendix G. The roadway segment LOS analysis applies County LOS standards as described in the General Plan Policy CI-3.1. Additional modeling assumptions, calculations, and analysis for each of the alternatives is provided in Appendix G.

As shown in Table 6 in Appendix G, assumed cannabis uses under CLUO alternatives 2 through 5 would add traffic to three segments of County Road 102 (between Covell Boulevard to SR 113) that exceeds the identified General Plan thresholds for these segments under existing conditions. In addition, cannabis uses under Alternative 3 would add traffic on County Road 98 (County Road 24 to State Route 16) and County Road 102 (County Road 27 to Gibson Road) that exceeds the identified General Plan thresholds for these segments under existing conditions. County Road 98 and 102 are used extensively by business and other commuter traffic traveling between the City of Davis and the City of Woodland. Despite the County’s stated intentions that capacity on these roadways be retained for agricultural uses, the vast majority of the operational LOS capacity of these specific roadway segments is utilized under existing conditions by business and commuter traffic passing through the unincorporated area. In response to the potential for conditions such as this, Policy CI-3.1 allows exceptions to identified LOS thresholds for agricultural uses. These exceptions, described further below, are applicable to cannabis uses. The effect of these exceptions is that agricultural use of these roadways does not constitute an adverse impact. Further discussion is provided below.

As described, an important function of the County roadway network is to provide for the efficient transport of agricultural goods and equipment as detailed in the General Plan. Policy CI-3.1 of the General Plan states that the goal of the service thresholds is to balance the preservation of community and rural values with a safe and efficient circulation system, and that LOS thresholds are intended to limit the planned capacity of the County’s roadways (Yolo County 2009a). The LOS standards and policies are in place, among other purposes, to retain adequate roadway capacity for agricultural purposes. Policy CI-3.1 (X) of the General Plan states that exceptions to the LOS thresholds may be allowed in such circumstances that may include but are not limited to preserving agriculture or open space land, enhancing the agricultural economy, and preserving the rural character of the County. Cannabis is defined by the state and is proposed to be defined in the CLUO as an agricultural land use that would be subject to the agriculturally-focused “exceptions” of Policy CI-3.1(X).

The following CLUO requirements promote the reduction of vehicle travel consistent with General Plan CI-1.3 and CI-2.2.

- Section 8-2.1408(N) Employee Services: Permittees shall comply with applicable labor standards including parking, toilets, drinking water, safety stations, shading, and hand-washing stations. Employee housing (temporary and/or permanent), including for on-site security, must have all necessary services (e.g. approved systems for the provision of water and treatment of wastewater) and required approvals. The provision of employee housing without required permits/approvals is grounds for revocation or suspension of the use permit. Permittees shall encourage employee ride-sharing and encourage employees to minimize trips.
- Section 8-2.1408(JJ) Roadways: In accordance with the County’s adopted policies and standards cannabis operators are strongly encouraged to take affirmative measures to combine trips, reduce greenhouse gas emissions, and minimize vehicle miles traveled. Policy CI-3.1 of the Circulation Element of the County General Plan identifies level of service policies intended to retain capacity on rural roads for agricultural uses, which includes cannabis cultivation.

If triggered by conditions identified in the Yolo Transportation Impact Study Guidelines, e.g. 100 new trips or more, applicants will prepare a traffic assessment for consideration as part of their use CUP application. In situations where a project would substantially and adversely alter physical or operational conditions on a County roadway beyond the planned condition anticipated in the adopted General Plan, roadway improvements (e.g. safety improvements) or other circulation improvements will be required as appropriate.

The permittee shall install/undertake appropriate roadway improvements identified by the County Engineer or District Fire Chief as appropriate, for County roads, or Caltrans and District Fire Chief for State roads, to adequately resolve identified concerns in a manner consistent with adopted standards and requirements as applied to other similar uses.

The following CLUO Sections 8-2.1408(K) (below) and 8-2.1408(JJ) (described above) would ensure adequate emergency access consistent with Policy CI-3.18.

Driveway approaches to County and State maintained roads shall be per current County Improvement Standards or Caltrans requirements, as applicable. An encroachment permit may be required. Controlled access entries must provide a rapid entry system (e.g. Knox Box approved by the local Fire District or fire service provider) for use by emergency personnel and provide adequate space for vehicles to access the lock without impeding the right-of-way. A County assigned street address is a requirement. The address must be posted and adhere to display requirements of the Fire Code. Permittees must demonstrate safe and adequate driveway access to the satisfaction of the County or Caltrans, as applicable, in compliance with applicable standards. Access considerations identified in Section 8-1.802 of the County Code shall apply. *(For the convenience of the reader these include: will the proposed use have access characteristics different from other permitted land uses; does the proposed access have inadequate design; will emergency vehicle access be impaired; would the proposed access adversely affect safe operations on the adjoining roadway system; are site distance, visibility, proximity to parking, drainage, turning radius, angle of intersection, vertical alignment, and pavement condition adequate for the proposed use and consistent/equitable in relation to access requirements for other permitted uses; proximity to other driveways and intersections; other relevant circumstances identified by the County).* Driveways shall have an all-weather surface, such as compacted gravel.

Thus, implementation of the CLUO under any of the alternatives would not conflict with the transportation related objectives, goals, and policies of the General Plan.

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 that personal outdoor cultivation would be an ancillary use to the residential parcel, no significant vehicle travel to support the cultivation is expected.

This impact would be **less than significant** for all alternatives.

### **Impact TRANS-2: Conflict or be Inconsistent with CEQA Guidelines Section 15064.3(b)**

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As described in subsection 3.14.3 under VMT Significance Threshold Methodology, implementation of the proposed CLUO, including subsequent Cannabis Use Permits approved pursuant to the adopted CLUO, would not conflict or be inconsistent with CEQA Guidelines 15064.3(b). Construction and operation of commercial cannabis sites associated with adoption and implementation of the proposed CLUO, including subsequent Cannabis Use Permits pursuant to the adopted CLUO would generate vehicle trips. Alternative 1 would result in no increase in project-generated net VMT over existing conditions and therefore would have **no impact**. The implementation of Alternative 2, Alternative 3, Alternative 4, and Alternative 5 would result in no net increases in cumulative VMT; therefore, the impact would be **less than significant**.

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Implementation of the proposed CLUO, including subsequent Cannabis Use Permits pursuant to the adopted CLUO assumed for analysis purposes would create new agriculturally-related opportunities. While most existing and eligible cannabis cultivation sites would remain in their current locations, some of the existing or eligible cultivation sites assumed to be required to relocate to comply with zoning and/or buffering standards under CLUO (nine sites under alternatives 1, 3, and 4 and 30 sites under alternatives 2 and 5). As detailed above, it is assumed that any cannabis cultivation sites that would potentially be relocated under the alternatives would be moved to nearby locations; therefore, the relocation would not result in any change in VMT.

As identified in Table 2-4, alternatives 2 through 5 would expand existing cannabis uses in the County to include new cultivation sites as well as noncultivation uses (commercial nurseries, processing, distribution, testing, manufacturing, microbusiness, and retail uses) that would support the cultivation of cannabis. Cannabis is defined by the state and is proposed to be defined in the CLUO as an agricultural land use. Cannabis uses proposed under the CLUO are consistent with planned land use activities and growth under the General Plan as well as the agricultural, industrial, and commercial zoning in the County. The General Plan EIR concluded that General Plan planned population and employment growth would result in significant and unavoidable impacts related to the increase in VMT (Yolo County 2009b). Implementation of the CLUO would not alter the impact conclusions of the General Plan EIR.

The following CLUO sections address transportation measures to reduce VMT:

- Section 8-2.1408(N): Employee Services: Permittees shall comply with applicable labor standards including parking, toilets, drinking water, safety stations, shading, and hand-washing stations. Employee housing (temporary and/or permanent), including for on-site security, must have all necessary services (e.g. approved systems for the provision of water and treatment of wastewater) and required approvals. The provision of employee housing without required permits/approvals is grounds for revocation or suspension of the use permit. Permittees shall encourage employee ride-sharing and encourage employees to minimize trips.
- Section 8-2.1408(JJ): Roadways: In accordance with the County's adopted policies and standards cannabis operators are strongly encouraged to take affirmative measures to combine trips, reduce greenhouse gas emissions, and minimize vehicle miles traveled. Policy CI-3.1 of the Circulation Element of the County General Plan identifies level of service policies intended to retain capacity on rural roads for agricultural uses, which includes cannabis cultivation.

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 that personal outdoor cultivation would be an ancillary use to the residential parcel, no significant vehicle travel to support the cultivation is expected that would affect VMT.

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

No new cannabis uses would be developed under Alternative 1; thus, there would be no increase in project-generated traffic or VMT above existing conditions. As described in subsection 3.14.3 under VMT Significance Threshold Methodology, implementation of the proposed CLUO, including subsequent Cannabis Use Permits approved pursuant to the adopted CLUO, would not conflict or be inconsistent with CEQA Guidelines 15064.3(b). Therefore, **no impact** on VMT would occur under Alternative 1.

**Alternative 2: All License Types with Moderate Limits**

Implementation of Alternative 2 is assumed to result in the addition of new cannabis noncultivation facilities (i.e., processing, manufacturing, testing, and distribution facilities) within the County. The placement of such facilities in the unincorporated area of the County near existing and future cultivation uses would allow

cultivators to avoid transporting cannabis to more distant locations where these facilities currently exist (e.g., existing testing facilities are located in the cities of Davis and Sacramento). Therefore, allowing for noncultivation facilities to be located in close proximity to cultivation operations could potentially reduce VMT under Alternative 2. Additionally, many of the sites where cannabis operations could occur are currently occupied by VMT-generating land uses (i.e., agricultural, industrial, commercial). Implementation of Alternative 2 is not expected to alter the existing land use traffic generation of the sites in a manner that could substantially change VMT base conditions because cannabis uses operate similar to agricultural, industrial, and commercial zoned land uses. All cannabis uses would be subject to the requirements of CLUO Section 8-2.1408(N) and 8-2.1408(JJ) that include vehicle trip reduction measures.

Thus, implementation of Alternative 2 is not expected result in a net increase in countywide VMT beyond what was evaluated in the General Plan EIR. As described in subsection 3.14.3 under VMT Significance Threshold Methodology, implementation of the proposed CLUO, including subsequent Cannabis Use Permits approved pursuant to the adopted CLUO, would not conflict or be inconsistent with CEQA Guidelines 15064.3(b). This impact would be **less than significant** under Alternative 2.

#### **Alternative 3: All License Types with High Limits**

Like Alternative 2, Alternative 3 is assumed to result in the addition of noncultivation facilities (i.e., processing, manufacturing, testing, distribution, retail sales, and microbusiness facilities) within the County, which is currently devoid of any such facilities. The placement of such facilities in the unincorporated area of the County near existing and future cultivation uses would allow cultivators to avoid transporting cannabis to more distant locations where these facilities currently exist (e.g., existing testing facilities are located in the cities of Davis and Sacramento). Therefore, allowing for noncultivation facilities to be located in close proximity to cultivation operations could potentially reduce VMT, as well as through compliance with the requirements of CLUO Section 8-2.1408(N) and 8-2.1408(JJ) that include vehicle trip reduction measures.

Thus, implementation of Alternative 3 is not expected result in a net increase in countywide VMT beyond what was evaluated in the General Plan EIR. As described in subsection 3.14.3 under VMT Significance Threshold Methodology, implementation of the proposed CLUO, including subsequent Cannabis Use Permits approved pursuant to the adopted CLUO, would not conflict or be inconsistent with CEQA Guidelines 15064.3(b). 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 Types**

Like Alternative 2, Alternative 4 is assumed to result in the addition of noncultivation facilities (i.e., processing, manufacturing, testing, distribution, retail sales, and microbusiness facilities) within the County, which is currently devoid of any such facilities. The placement of such facilities in the unincorporated area of the County near existing and future cultivation uses would allow cultivators to avoid transporting cannabis to more distant locations where these facilities currently exist (e.g., existing testing facilities are located in the cities of Davis and Sacramento). Therefore, allowing for noncultivation facilities to be located in close proximity to cultivation operations could potentially reduce VMT, as well as through compliance with the requirements of CLUO Section 8-2.1408(N) and 8-2.1408(JJ) that include vehicle trip reduction measures.

Thus, implementation of Alternative 4 is not expected result in a net increase in countywide VMT beyond what was evaluated in the General Plan EIR. As described in subsection 3.14.3 under VMT Significance Threshold Methodology, implementation of the proposed CLUO, including subsequent Cannabis Use Permits approved pursuant to the adopted CLUO, would not conflict or be inconsistent with CEQA Guidelines 15064.3(b). This impact would be **less than significant** under Alternative 4.

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

Like Alternative 2, Alternative 5 is assumed to result in the addition of noncultivation facilities (i.e., processing, manufacturing, testing, distribution, and microbusiness facilities) within the County, which is currently devoid of any such facilities. The placement of such facilities in the unincorporated area of the County near existing and future cultivation uses would allow cultivators to avoid transporting cannabis to more distant locations where these facilities currently exist (e.g., existing testing facilities are located in the cities of Davis and Sacramento). Therefore, allowing for noncultivation facilities to be located in close

proximity to cultivation operations could potentially reduce VMT, as well as through compliance with the requirements of CLUO Section 8-2.1408(N) and 8-2.1408(JJ) that include vehicle trip reduction measures.

Thus, implementation of Alternative 5 is not expected result in a net increase in countywide VMT beyond what was evaluated in the General Plan EIR. As described in subsection 3.14.3 under VMT Significance Threshold Methodology, implementation of the proposed CLUO, including subsequent Cannabis Use Permits approved pursuant to the adopted CLUO, would not conflict or be inconsistent with CEQA Guidelines 15064.3(b). 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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