

3 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

This chapter is organized by environmental resource topic. Each resource topic is addressed in a separate section that presents an integrated discussion of the existing conditions (including environmental setting and regulatory setting) associated with the resource, potential environmental effects of the project (including direct and indirect impacts) on the resource, and mitigation measures to reduce significant effects.

Cumulative and growth-inducing impacts are discussed in Chapter 4, “Cumulative Impacts and Overconcentration,” and Chapter 6, “Other CEQA-Mandated Sections,” respectively.

APPROACH TO THE ENVIRONMENTAL ANALYSIS

In accordance with the State CEQA Guidelines (CCR Section 15126.2), this Draft EIR identifies and focuses on the significant direct and indirect environmental effects from the adoption and implementation of the proposed CLUO, including subsequent Cannabis Use Permits pursuant to the adopted CLUO. The analysis considers the short-term and long-term effects of the project based on construction and operational assumptions described below.

As described in Chapter 1, “Introduction,” this analysis focuses on those environmental resource topics for which potentially significant impacts were identified based on review of comments received during project scoping and additional research and analysis of relevant project data.

The remainder of this chapter addresses the following resource topics:

- Section 3.1, “Aesthetics”
- Section 3.2, “Agricultural Resources”
- Section 3.3, “Air Quality and Odors”
- Section 3.4, “Biological Resources”
- Section 3.5, “Cultural Resources”
- Section 3.6, “Energy”
- Section 3.7, “Geology and Soils”
- Section 3.8, “Greenhouse Gas Emissions and Climate Change”
- Section 3.9, “Hazards and Hazardous Materials”
- Section 3.10, “Hydrology and Water Quality”
- Section 3.11, “Land Use and Planning”
- Section 3.12, “Noise”
- Section 3.13, “Public Services”
- Section 3.14, “Transportation and Circulation”
- Section 3.15, “Utilities and Service Systems”

Sections 3.1 through 3.15 follow the same general format:

- **“Environmental Setting”:** This section describes existing environmental conditions throughout the County, in accordance with the State CEQA Guidelines (CCR Section 15125). This setting generally serves as the baseline against which environmental impacts are evaluated. The NOP for the project was issued on August 24, 2018. Typically, and in accordance with State CEQA Guidelines Section 15125, the date on which the NOP is issued is considered appropriate for establishing the baseline. Baseline land use condition assumptions for new cannabis uses on agricultural lands are based on actual countywide crop data percentages in the following categories: orchard/vineyard, row crops, and rangeland. As further discussed below in the Appendix D, baseline land use conditions for new cannabis uses on commercial and industrial zoned lands assumes that 70 percent of the commercial zoned lands are

developed, and 80 percent of the industrial zoned lands are developed. This assumption is based on County GIS countywide land use data that identifies the majority of these areas have been developed (see Appendix D). Within each of the resource topic areas identified above, the assumed baseline and justification for it are described in further detail.

As described in Chapter 2, “Description of Preferred Alternative and Equal Weight Alternatives,” there are 78 existing and eligible cannabis cultivation sites in the County. Cultivation operations that do not comply with Chapter 20 of Title 5 of the Yolo County Code, including illegal operations operating without any required approvals and licensed operations operating out of compliance, are subject to code enforcement and/or law enforcement unless brought into compliance. Enforcement activities taken by the County have reduced the extent of illegal and/or non-compliant cannabis operations. However, it is acknowledged that illegal cannabis and/or non-compliant operations may occur in the County after adoption and implementation of the ordinance. While this Draft EIR acknowledges the adverse environmental effects of illegal and/or non-compliant cannabis operations as part of the environmental baseline condition, the Draft EIR does not propose mitigation measures to address these operations as they are not part of the project.

- **“Regulatory Setting”:** This section presents the laws, regulations, plans, and policies relevant to each resource topic, including state, regional, and local regulations that address potential adverse environmental impacts. At this time, there is a disparity between federal law and state/local law. Cannabis is identified as a Schedule 1 controlled substance under the federal Controlled Substance Act. Operations related to the growing, processing, and sale of cannabis products are in violation of federal law. Federal agencies are generally prohibited from issuing permits or approvals for any operation that is in violation of federal law. Thus, under the current regulatory environment the analysis presented in this EIR cannot assume compliance with federal permitting requirements that would usually address certain environmental impacts (e.g., filling of waters of the United States and incidental take of species listed under the federal Endangered Species Act). However, over the course of implementing the CLUO this may change. It is anticipated that at some future point the federal government will decriminalize cannabis and better align federal policy with cannabis policies and programs already in place in many states including California. As a result, where this becomes relevant (as identified in the impact analysis), alternative mitigation is identified if it is available, including avoidance in the interim, with subsequent compliance with federal regulations and permitting identified as an available long-term mitigation should federal legalization of cannabis activities occur.
- **“Environmental Impacts and Mitigation Measures”:** In accordance with the State CEQA Guidelines (CCR Sections 15126, 15126.2, and 15143), this section identifies the baseline conditions for the environmental issue area under evaluation, the method of analysis to determine whether an impact may occur, and thresholds of significance used to determine the level of significance of the environmental impacts for each resource topic. The thresholds of significance are based on the checklist presented in Appendix G of the most recently adopted State CEQA Guidelines (December 28, 2018), best available data, applicable regulatory standards, and local practice/standards. The level of each impact is determined by analyzing the effects of each project alternative to the defined baseline conditions and comparing it to the applicable significance threshold.

The impact analysis is focused on changes to the physical environment from implementation of the proposed CLUO, including assumed cannabis uses under each of the various five alternatives. The analysis also provides an assessment of performance standards that would regulate both existing cannabis cultivation operations and new cannabis operations. For example, possible environmental impacts associated with existing cannabis operations could result from physical improvements required to bring the operation into compliance, such as relocation of operations to less environmentally sensitive portions of the site or to new sites. Environmental impacts associated with new cannabis operations would include construction and operation of facilities in accordance with the performance standards of the proposed CLUO, many of which are intended to protect the environment. The impact analysis would also consider the

environmental protections provided by existing regulations, unrelated to the CLUO, that would apply to cannabis facilities, such as state cannabis regulations and other provisions of the Yolo County Code.

Project impacts are organized by environmental topic abbreviation in each subsection (e.g., Impact AES-1, Impact AES-2, Impact AES-3, etc.). A bold-font impact statement, a summary of each impact, and a statement of the level of significance for each alternative precedes the impact analysis. The analysis and discussion that follows the impact statement includes the substantial evidence supporting the impact significance conclusion. This Draft EIR evaluates impacts of the CLUO under each of the five alternatives at an equal level of detail.

The EIR identifies feasible mitigation measures that could avoid, minimize, rectify, reduce, or compensate for significant adverse impacts (PRC Section 21081.6[b]). Because the proposed project is adoption and implementation of the CLUO, the identified mitigation measures take the form of new or modified regulatory requirements that will be incorporated into the final CLUO and thereby become fully enforceable consistent with the requirements of state law. Mitigation measures are not required for effects found to be less than significant. Where feasible mitigation for a significant impact is available, it is described in this EIR following the impact, along with its effectiveness at addressing the impact. Each identified mitigation measure is labeled numerically to correspond with the impact it addresses. Where sufficient feasible mitigation is not available to reduce an impact to a less-than-significant level the impact is identified as significant and unavoidable.

It is important to note that environmental impact analyses under CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents, unless the proposed project might cause or risk exacerbating environmental hazards or conditions that already exist (CCR Section 15126.2[a]). In those specific instances, it is the project's impact on the environment and not the environment's impact on the project that compels an evaluation of how future residents or users could be affected by exacerbated conditions (*California Building Industry Association v. Bay Area Air Quality Management District* [2015] 62 Cal. 4th 369).

Chapter 4, "Cumulative Impacts and Overconcentration," contains an analysis of the potential for cumulative effects not otherwise identified in Chapter 3, and effects from a concentration or cluster of multiple cannabis uses located in distinct subregions of the County.

CANNABIS USE ASSUMPTIONS FOR ALTERNATIVES

As further described in Appendix D, the EIR analysis is based on the following assumptions associated with relocations of existing cultivation sites associated with compliance with zoning and buffering standards under the CLUO as well as assumed new cannabis uses. It should be noted that existing cannabis sites may also be relocated for compliance with other CLUO requirements such as flooding, biological resources, slopes, and other site-specific constraints.

The following assumptions were used for all alternatives for relocated or new cultivation sites:

- Cannabis cultivation parcels are assumed to be 40 acres in size.¹
- Cannabis cultivation activity footprint is assumed at 2 acres (land area that contains the cultivation canopy and supporting operations and buildings).¹
- 33 percent of sites located on land areas in row crop production²

¹ Based on existing cultivation site data, County GIS data, and review of satellite images.

² Based on acreage data in the Yolo County 2018 Crop Report (approximately 196,000 acres in row crop production, 227,000 acres in orchard or vineyard production).

- 39 percent of sites located on land areas in orchard or vineyard production²
- 28 percent of sites located on land areas used for grazing/pastureland³
- Relocated sites occur near the existing site
- Cultivation site construction activities:
 - All sites would conduct ground vegetation removal.
 - 50 percent of sites that require construction of new onsite roadways, buildings, and infrastructure.⁴
- Assumed cultivation site operation activities:
 - Preparation, planting, maintenance, and harvesting of cannabis (outdoors and in structures) through the use of staff, equipment, and vehicles.
 - Operation of greenhouses and interior lighting for the growing of cannabis plants in nurseries for outdoor planting or as part of a mixed-light or indoor cultivation.
 - Use of carbon dioxide for plant growth enhancement.
 - Employee vehicle trips to and from the site.
 - Seasonal employee vehicle trips to and from the site during harvest of outdoor cultivation.
 - Truck trips to and from the site to deliver supplies (e.g., soil amendments, fertilizers, pesticides, and carbon dioxide gas tanks) and/or transport cannabis plants, cannabis waste, and non-cannabis waste.
 - Operation of well, septic, and drainage facilities.

The following assumptions were used for new noncultivation uses for Alternatives 2 through 5.

- 90 percent of noncultivation uses are vertically integrated and located on agriculturally zoned parcels assumed to be 40 acres in size located on the same range of agricultural lands assumed for cultivation relocation.⁵
 - Vertically integrated sites would include a combination of the follow activity footprints:
 - Cultivation activity footprint is 2 acres per cultivation site.
 - Nursery activity footprint (land area that contains the nursery facility and supporting operations and buildings) is assumed to be 15 acres per nursery.
 - Processing, manufacturing, testing, distribution, retail, and microbusiness activity footprints are assumed to be 0.50 acres per use.
 - Construction activities for vertically integrated sites
 - Removal of existing ground vegetation and/or crops within activity footprint.
 - Grading to create onsite roadways, parking, and building pads for a single-story buildings.
 - Graveling or paving of onsite roadways and parking.
 - Grading and/or trenching for septic systems or public wastewater system connections, wells and water tanks or public water system connections, electrical facilities, and drainage/water quality improvements.
- 10 percent of noncultivation uses are located on commercial or industrial zoned property and would not be vertically integrated because of limited availability of undeveloped commercial and industrial parcels and average parcel sizes (approximately 1.5 acres for industrial sites and 7 acres for commercial sites).⁶
 - Approximately 80 percent of noncultivation sites within commercial zoned property are assumed to be located within an existing building on a developed site. Approximately 70 percent of noncultivation sites within industrial zoned property are assumed to be located within an existing building on a developed site.⁷

³ Based on acreage data from the California Department of Conservation Table A-46: Yolo County 2014-2016 Land Use Conversion, approximately 166,000 acres.

⁴ Based on County Cannabis Task Force staff experience with existing cultivation operations. Remaining sites are assumed to be located on sites that have active agricultural where ground disturbance routinely occurs, and buildings already exist.

⁵ Vertically integration means more than one cultivation and/or noncultivation use on a single parcel.

⁶ Non-vertically integrated sites under Alternative 5 would locate in agricultural zones.

⁷ County GIS data identifies approximately 750 acres of commercial zoned land (approximately 70 percent developed) and 610 acres of industrial zoned land (approximately 80 developed) in the unincorporated area.

- Assumed noncultivation operation activities:
 - Operation of the building that includes energy use, wastewater generation, water demand, and stormwater management.
 - Employee and customer vehicle trips to and from the site.
 - Truck trips to and from the site to deliver supplies (e.g., chemicals, gases, containers, equipment) and/or transport cannabis plants, cannabis products, cannabis or cannabis product waste, and non-cannabis waste.

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

As identified in Chapter 2, “Description of Preferred Alternative and Equal Weight Alternatives,” Alternative 1 is assumed to maintain the 78 existing and eligible cultivation sites and would not allow any new cannabis uses. The following assumptions are used to evaluate potential impacts for relocation of cultivation sites. Nine of the 78 existing and eligible sites are assumed to relocate due to zoning standards of the CLUO which could result in the development of 18 acres (see Table 2-5).

Alternative 2: All License Types with Moderate Limits

As identified in Chapter 2, “Description of Preferred Alternative and Equal Weight Alternatives,” Alternative 2 assumes that all types of cannabis operations would be allowed, including commercial cultivation, nurseries, processing, manufacturing, testing, distribution, retail, and microbusinesses. This alternative is assumed to include two new cultivation uses and 52 new noncultivation uses. Implementation of the CLUO is assumed to require relocation of 30 of the 78 existing and eligible cultivation sites to meet the buffering and zoning requirements. The two new cultivation sites under this alternative as assumed to occur with vertical integration with noncultivation uses. Approximately 47 noncultivation uses would be vertically integrated, while five noncultivation uses would be located on industrial or commercial zoned lands. Cultivation site relocations and new cannabis uses are assumed to result in the development of 164 acres (see Table 2-5).

Alternative 3: All License Types with High Limits

Alternative 3 assumes that all types of cannabis operations would be allowed, including commercial cultivation, nurseries, processing, manufacturing, testing, distribution, retail, and microbusiness. This alternative is assumed to include 82 new cultivation uses and 104 new noncultivation uses. Implementation of the CLUO is assumed to require relocation of nine of the 78 existing and eligible cultivation sites to meet zoning requirements. It is assumed that 25 new cultivation sites occur with vertical integration with new noncultivation uses, while 57 new cultivation sites would not be vertically integrated. and under this alternative as assumed to occur with vertical integration. Approximately 94 noncultivation uses would be vertically integrated, while 10 noncultivation uses would be located on industrial or commercial zoned lands. Cultivation site relocations and new cannabis uses are assumed to result in the development of 379 acres (see Table 2-5).

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

Alternative 4 assumes that personal cultivation, commercial cannabis cultivation, nurseries, processing, and microbusinesses would be limited to indoor and mixed-light operations within a structure. It is assumed that 75 of the existing and eligible cannabis cultivation sites with outdoor cultivation would convert entirely to indoor or mixed-light cultivation in greenhouses or indoor buildings under this alternative. This alternative is assumed to include two new cultivation uses and 52 new noncultivation uses. Implementation of the CLUO is assumed to require relocation of nine of the 78 existing and eligible cultivation sites to meet the buffering and zoning requirements. The two new cultivation sites under this alternative as assumed to occur with vertical integration with noncultivation uses. Approximately 47 noncultivation uses would be vertically integrated, while five noncultivation uses would be located on industrial or commercial zoned lands. Cultivation site relocations and new cannabis uses are assumed to result in the development of 122 acres (see Table 2-5).

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

Alternative 5 assumes all license types, with the exception of retail, but would limit commercial cannabis to agricultural zone districts. This alternative is assumed to include two new cultivation uses and 50 new noncultivation uses. Implementation of the CLUO is assumed to require relocation of 30 of the 78 existing and eligible cultivation sites to meet the buffering and zoning requirements. The two new cultivation sites under this alternative as assumed to occur with vertical integration with noncultivation uses. Approximately 45 noncultivation uses would be vertically integrated, while five noncultivation uses would be located in agricultural zoned lands. Cultivation site relocations and new cannabis uses are assumed to result in the development of 163 acres (see Table 2-5).

EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA allows a lead agency to limit the detail of discussion of environmental effects that are not potentially significant (PRC Section 21100, CCR Section 15128). Based on research and analysis of technical studies and data, and review of the CLUO, it was determined that the project would not result in significant environmental impacts identified below. Accordingly, these resources are not addressed further in this Draft EIR.

Airport and Creation of Noise-Sensitive Receptors

Adoption and implementation of the proposed CLUO would not result in the development of new residential land uses or other types of noise-sensitive receptors. Additionally, the CLUO would not result in the development of new residential land uses near private air strips or public commercial airports in Yolo County. Cannabis uses would be required to comply with the comprehensive land use plans (CLUPs) and County Zoning Code Section 8-2.903(f) (Airport Overlay Zones) and the development requirements in Section 8-2.906(f) and the CLUPs that address density, building heights, noise, and hazards. Thus, airport noise impacts are not discussed further.

Carbon Monoxide Emission Hotspots

Carbon monoxide (CO) “hot spots” are localized concentrations of CO emissions that exceed state and federal air quality standards for the protection of public health. CO hot spots can be created as the result of a large number of vehicles idling at intersections. Regarding the potential for CO hot spots at local intersections, these types of effects only occur at intersections experiencing extremely high volumes of traffic. Assumed operational activities associated with the most development intensive alternative under the CLUO (Alternative 3) are not anticipated to generate more than 14,864 trips per day (see Appendix G). Moreover, assumed new cannabis uses from implementation of the CLUO would generally be spread throughout the unincorporated area. Thus, it is not expected that assumed vehicle trips generated by cannabis uses would result in excessive congestion at any intersection that experiences high volumes of vehicles with long wait times. For these reasons, it is not expected that the additional trips associated with new cultivation would contribute substantially to traffic congestion at affected intersections such that local CO “hot spots” may occur that exceed the California ambient air quality standards or national ambient air quality standards for CO. Therefore, this issue is not discussed further.

Construction-Related Toxic Air Contaminants

Construction of cannabis uses may involve the use of diesel-powered equipment that emit diesel PM. However, construction activities would be limited and would be temporary. Given the minimal construction activities described in Chapter 2, “Description of Preferred Alternative and Equal Weight Alternatives,” “individual cannabis uses would not expose existing receptors to substantial construction-related toxic air contaminant concentrations and this issue is not discussed further.

Conflict or Obstruct Implementation of a Sustainable Groundwater Management Plan

As identified in Table 3.10-2, the Yolo Subbasin is of high priority and Solano and Colusa Subbasins are of medium priority and are subject to development of a Groundwater Sustainability Plan (GSP). The Yolo Subbasin Groundwater Agency was officially formed on June 19, 2017, for the purpose of acting as the Groundwater Sustainability Agency for the Yolo Subbasin, which underlies the majority of Yolo County under the 2016 Bulletin 118 definitions. The planning deadline for California's first round of GSPs is January 31, 2022, for all other high- and medium-priority basins. Because a GSP has not yet been developed this topic is not discussed further.

Displacement of Substantial Number of Existing People or Housing

Commercial cannabis uses have no significant potential to result in a substantial displacement of housing or displace people because cannabis uses would only be allowed in agricultural, commercial, industrial zones and would be prohibited from residential zones (see Table 2-3 in Chapter 2, "Description of Preferred Alternative and Equal Weight Alternatives"). Therefore, this issue is not evaluated further in this impact analysis.

Drainage, Energy, and Telecommunication Infrastructure

New cannabis uses from implementation of the CLUO are anticipated to construct and/or improve stormwater drainage, electric power, natural gas, and telecommunication facilities as needed based on site-specific conditions. Extension of these infrastructure facilities are expected to be limited as are generally available along roadway frontage of the parcels or may be accommodated on the site (e.g., drainage ditches, detention basins, solar energy generation). The potential environmental impacts of extending infrastructure off-site would be evaluated as part of subsequent application review. However, the overall environmental impacts for construction and operation of cannabis uses (including those related to infrastructure facilities) have been programmatically evaluated in this EIR. The reader is referred to Section 3.6, "Energy," for energy use impacts and Section 3.10, "Hydrology and Water Quality," for drainage and water quality impacts. This issue is not further evaluated.

Emergency Access

CLUO Section 8-2.1408, Specific Use Requirements and Performance Standards, includes the requirement that controlled access entries must provide a rapid entry system for use by emergency personnel and provide adequate space for vehicles to access without blocking the right-of-way. Additionally, the CLUO would require that site design be compliant with all applicable County requirements; thus, emergency access for future cannabis projects under the CLUO would be subject to review by Yolo County and the appropriate responsible emergency service agencies. Therefore, future cannabis projects under the CLUO would be designed to meet applicable emergency access and design standards. Therefore, adequate emergency access would be provided. This issue is not discussed further.

Forestry Resources

The NOP substantiated that forestry resources would not be addressed in the Draft EIR because Yolo County has no commercial forestland or timber resources and the proposed CLUO would prohibit the removal of oak woodlands. Therefore, no impact on forestry resources is expected to occur.

Parks and Recreation

The parks in Yolo County are managed by federal, state, and local authorities. Implementation of the CLUO is not expected to result in a direct loss of park and recreational facilities as cannabis uses are not permitted in public and open space zones. Cannabis uses are agricultural and would not trigger the need for new or modified park facilities. Therefore, no impact on parks and recreation is expected to occur.

Public Facilities

Implementation of the CLUO would not directly result in the creation of new population that would increase the demand for libraries and other governmental services. However, CLUO Alternatives 2, 3, 4, and 5 would create new employment that could result in new County residents. This extent of development in the County is not expected to trigger the immediate need to construct new facilities. Construction of cannabis-related buildings would pay the County Facilities and Services Development Fee at the building permit issuance that would provide funding for facility improvements or new facilities 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). Therefore, no physical environmental impacts associated with new government facilities from implementation of the CLUO would occur.

Public Schools

Implementation of the CLUO would not directly result in the creation of new population that would increase the demand for libraries and other governmental services. However, CLUO Alternatives 2, 3, 4, and 5 would create new employment that could result in new County residents. Development of commercial and residential building associated with cannabis uses would be subject to school impact fees. 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. This issue is not discussed further.

Septic Systems

Where new cannabis uses would use septic tanks or other on-site wastewater treatment and disposal systems, this activity would be regulated through the Yolo County Onsite Wastewater Treatment Systems Local Agency Program described in Yolo County Code Chapter 19 of Title 6. Chapter 19 requires that a site evaluation be prepared to confirm that a septic system can operate properly. Section 6-19.605 identifies that the evaluation must include details on soil conditions (e.g., soil textural character and percolation rate), depth to groundwater, adequate land area to accommodate a 100-percent system replacement. Section 6-19.606 includes requirements for siting, design, operation, and maintenance measures to avoid system failures. Use of septic tanks or other on-site wastewater treatment and disposal systems would not be authorized in areas with soils incapable of supporting these facilities. Therefore, this issue is not evaluated further in this impact analysis.

Seiche Hazards

A seiche is the oscillation of a body of water at its natural period. Seiches occur most frequently in enclosed or semi-enclosed basins such as lakes, bays or harbors. Since Yolo County is generally subject to only low to moderate levels of earthquake-induced ground shaking, hazard of a seiche is not considered high. However, in the event that significant ground shaking does occur, the County of Yolo Emergency Plan has identified the following primary areas in the County in which a seiche could occur: Lake Berryessa; the Sacramento River, which could affect bordering communities, including Knights Landing and Clarksburg; the Yolo Bypass when water is present in the bypass; and Lake Washington Harbor, the Port of West Sacramento, and the Deep Water Ship Channel. Since Lake Berryessa is closest of these areas to active faults, it is perhaps the most likely to experience a seiche. Based on a review of the available literature, however, no identified or measurable seiches have been documented in Yolo County surface water bodies. Adoption and implementation of the proposed CLUO would not increase the potential for seiches because it would not alter seismic conditions in the region. Therefore, this issue is not evaluated further in this impact analysis.

Transit, Pedestrian, and Bicycle Conflicts

Due to the rural character of unincorporated area transportation network, the lack of transit, and the assumed dispersion of the individual cannabis operations and facilities throughout the unincorporated area, it is unlikely that the adoption and implementation of the proposed CLUO, including subsequent Cannabis Use Permits pursuant to the adopted CLUO, would generate substantial pedestrian, bicycle, or transit demand. Thus, the project would not conflict with a program, plan, ordinance or policy addressing pedestrian, bicycle, and transit facilities or otherwise decrease the performance or safety of such facilities. This issue is not discussed further.

Transportation Hazards and Emergency Access

CLUO Section 8-2.1408, Specific Use Requirements and Performance Standards, provides specific requirements and performance standards to regulate operations for all cannabis use types. These requirements and standards include the following requirements for driveway design and roadway improvements that may be required for individual cannabis sites:

- Section 8-2.1408(K): Driveway Access: 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.
- 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 permit 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.

Thus, all roadway improvements associated with new cannabis operations under the CLUO would be constructed in accordance with all applicable County and Caltrans design and safety standards. Additionally, the vehicle types associated with operation of cannabis operations (i.e., passenger vehicles, light-duty vehicles, single unit trucks) are consistent with the vehicle types currently utilizing the study area roadway network and thus would not result in the operation of incompatible uses. Therefore, the project would not increase hazards because of a design feature or incompatible uses. This issue is not discussed further.

Tsunami Hazards

Tsunamis are long period water waves caused by underwater seismic events, volcanic eruptions, or undersea landslides. Areas that are highly susceptible to tsunami inundation tend to be low-lying coastal areas, such as tidal flats, marshlands, and former bay margins that have been artificially filled. According to the Yolo County General Plan EIR, Tsunami wave run-up elevations for the Sacramento River in the Yolo County area have not been quantified but would not be expected to represent a hazard for Yolo County given its distance (more than 50 miles) from the coast. Adoption and implementation of the proposed CLUO would not increase the potential for tsunamis because it would not alter seismic conditions in the region. Therefore, this issue is not evaluated further in this impact analysis.

Vibration

No major operational sources of vibration would be constructed as part of the adoption and implementation of the CLUO. Construction of any subsequent cannabis use under the CLUO would not include vibration-intensive activities such as blasting or pile driving. In addition, subsequent cannabis use under the CLUO would not result in the location of new vibration-sensitive receptors to existing sources of vibration. Thus, the project would not result in excessive vibration or vibration levels such that any receptors would be adversely affected, and vibration-related impacts are not discussed further.

STANDARD TERMINOLOGY

This Draft EIR uses the following standard terminology:

- **“No impact”** means no change from existing conditions (no mitigation is required).
- **“Less-than-significant impact”** means no substantial adverse change in the physical environment (no mitigation is required). While there may be some associated impact, it is insignificant or acceptable based on the applicable thresholds of significance.
- **“Significant impact”** is a substantial, or potentially substantial, adverse change in the environment (PRC Section 21068 and CEQA Guidelines Section 15382). The CEQA Guidelines direct that this determination be made by the decision-making body (in this case, the Yolo County Board of Supervisors) and that it be based on scientific and factual data to the extent possible. The specific criteria for determining significance are identified for each section of Chapter 3 in the “Thresholds of Significance” section. The significance of an activity may vary with the setting. Significant impacts can be mitigated to less-than-significant levels by implementation of identified feasible mitigation measures.
- **“Significant and unavoidable impact”** is a substantial adverse change in the physical environment for which no mitigation has been identified as feasible to avoid the impact or reduce it to a less-than-significant level.
- **“Project”** means the proposed Cannabis Land Use Ordinance.