

6 OTHER CEQA-MANDATED SECTIONS

6.1 GROWTH INDUCEMENT

CEQA Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an EIR. Section 15126.2(e) of the State CEQA Guidelines provides the following guidance for assessing the growth-inducing impacts of a project:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can induce growth directly, indirectly, or both. Direct growth inducement would result if a project involved construction of new housing. Indirect growth inducement would result, for instance, if implementing a project resulted in:

- substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- substantial short-term employment opportunities (e.g., construction employment) that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; or
- removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area).

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open space land to urban uses, and other effects.

6.1.1 Growth-Inducing Impacts of the Project

The California Department of Food and Agriculture estimated that cannabis production in the state in 2016 was approximately 13.5 million pounds, with no anticipated increases in overall production from implementation of the Medical Cannabis Regulation and Safety Act and Adult Use of Marijuana Act by 2018 (CDFA 2017). Estimates for state cannabis consumption in 2018 under these acts range from 1.4 million pounds (Truth Enterprises 2016) to 2.5 million pounds, which is far below the state's current cannabis production capability. Thus, substantial growth in cannabis cultivation operation statewide or in the County is not expected to occur.

Foster Population Growth and Construction of Housing

Implementation of the CLUO is intended to regulate all cannabis activities, including personal use, commercial cultivation, and noncultivation uses (nurseries, processing, manufacturing, testing, distribution, retail, and microbusinesses), in the unincorporated area. Table 2-4 identifies the anticipated extent of development and employment associated with commercial cultivation and noncultivation uses under the five CLUO alternatives. Depending on the alternative, the number of new permanent full-time equivalent employees generated with implementation of the CLUO would range from none (Alternative 1) to 1,399 (Alternative 3). Current vacancy rates and the extent of new dwelling units anticipated by 2036 indicate that there would be adequate housing opportunities in the region to accommodate employment generated under the CLUO and that the project would not trigger the cumulative need to develop new housing beyond growth projections. As discussed under Impact LU-3, new cultivation and noncultivation sites would be spread countywide, and operational employees can be assumed to come from the surrounding areas with some employees needing to move into the area, which would result in population growth in the County. Yolo, Sacramento, and Solano Counties combined have approximately 63,000 existing unoccupied dwelling units, and housing vacancy rates have increased in Yolo County from 4.3 percent in 2017 to 5.2 percent in 2019. Several local jurisdictions in the region have reasonably foreseeable residential development communities. For example, West Sacramento has the Yarbrough, Liberty Specific Plan, and River Park developments, which would provide up to 7,200 new residential units combined and are in the entitlement process. Woodland has approved the Country Oaks subdivision, and the previously approved Spring Lakes Specific Plan is being built out. Other jurisdictions, such as the County and City of Winters, are incorporating suggestions from the Sacramento Area Council of Governments Housing Policy Tool Kit to address the availability of housing, such as the allowance for premanufactured buildings and accessory dwelling units in the zoning code and the adoption of regulations for support of farmworker housing and transitional housing. Thus, adequate housing opportunities in the region are considered to be available to accommodate the employment generated. The potential for a significant adverse impact is less than significant.

Eliminate Obstacles to Population Growth

Additionally, the project would not remove barriers to population growth. No new or expanded (beyond what is currently planned) public infrastructure facilities would be installed to support implementation of the CLUO, because cannabis uses would operate similar to the way that existing agricultural land uses in the County operate. No new roadway improvements would be required to serve cannabis uses. It is expected that most cannabis sites would use on-site wastewater treatment systems and wells for water supply. Therefore, the project would not contribute to substantial population growth or be considered growth inducing. The potential for a significant adverse impact is less than significant.

6.2 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

State CEQA Guidelines Section 15126.2(c) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed project is implemented. As documented throughout Chapter 3 (project level impacts) and Chapter 4, “Cumulative Impacts and Overconcentration,” of this Draft EIR, after implementation of the CLUO performance standards and identified mitigation measures, implementation of the CLUO would result in the following significant and avoidable impacts:

- Impact AES-3: Substantially Degrade the Existing Visual Character or Quality of the Project Area (all alternatives)
- Impact AQ-4: Expose a Substantial Number of People to Adverse Odors (all alternatives)
- Impact CUM-1: Cumulative Visual Character Impacts (all alternatives)
- Impact CUM-3: Cumulative Odor Impacts (all alternatives)
- Impact OVC-1: Visual Character Impacts from Overconcentration of Cannabis Uses (all alternatives)
- Impact OVC-3: Odor Impacts from Overconcentration of Cannabis Uses (all alternatives)

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines require a discussion of any significant irreversible environmental changes that would be caused by the project. Specifically, State CEQA Guidelines Section 15126.2(d) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

6.3.1 Use of Nonrenewable Resources

The project would result in the irreversible and irretrievable commitment of energy and material resources during construction and operation, including:

- construction materials, including such resources as soil, rocks, wood, concrete, glass, and steel;
- water supply for project construction and operation; and
- energy expended in the form of electricity, natural gas, diesel fuel, gasoline, and oil for equipment and
- transportation vehicles that would be needed for project construction and operation.

The use of these nonrenewable resources is expected to account for a minimal portion of the region's resources and would not affect the availability of these resources for other needs within the region.

Impact HYDRO-1 identifies that groundwater demand per acre of cultivation area and noncultivation uses for all the CLUO alternatives would be below the County's typical agricultural per acre water demands that are assumed to be replaced by cannabis uses, which range from 2.35 to 3.05 afy per acre of cropland (see Table 3.10-3). Permittees would be required to demonstrate adequate water supply under CLUO Section 8-2.1408(VV) and any on-site improvements that would necessary for service (e.g., groundwater well and storage tank) under CLUO Section 8-2.1408(OO) in order to obtain a Cannabis Use Permit. Thus, water supply impacts would be **less than significant** for all alternatives.

As discussed in Impact ENE-1, construction and operation of commercial cannabis cultivation and noncultivation sites associated with adoption and implementation of the proposed CLUO, including subsequent Cannabis Use Permits pursuant to the adopted CLUO, would result in the consumption of fuel (gasoline and diesel), electricity, and natural gas. The energy needs for construction of new and relocated commercial cannabis cultivation and noncultivation sites would be temporary and would not require additional capacity or increase peak or base period demand for electricity or other forms of energy. The CLUO would require all cultivation and noncultivation sites to derive 50 percent of their energy from renewable sources, and CCR Sections 8203, 8205, and 8206 include energy efficiency requirements that are more stringent than standard requirements in the California Energy Code. Further, CCR Sections 8203 and 8205 require all cannabis cultivation sites seeking relicensing after 2022 to supply their total electricity from a zero net energy renewable source. Energy consumption associated with all of the alternatives under the CLUO would not result in wasteful, inefficient, or unnecessary consumption of energy. Thus, the impact would be **less than significant** for all alternatives. The reader is referred to Section 3.6, "Energy," for an analysis of the CLUO's impacts on energy use under each of the five alternatives.

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