

## 5 ALTERNATIVES

### 5.1 INTRODUCTION

State CEQA Guidelines Section 15126.6(a) requires EIRs to describe:

a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (PRC Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (Section 15126.6[d]).

The State CEQA Guidelines require that the “no project” alternative be considered (Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR “shall also identify an environmentally superior alternative among the other alternatives” (Section 15126.6[e][2]).

In defining “feasibility” (e.g., “feasibly attain most of the basic objectives of the project”), State CEQA Guidelines Section 15126.6(f)(1) states, in part:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project’s significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted

above, EIRs must contain a discussion of “potentially feasible” alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency’s decision-making body—here, the Yolo County Board of Supervisors (Board). (See PRC Sections 21081.5, 21081[a][3].) The Board, for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint and may reject an alternative on that basis provided that the Board adopts a finding, supported by substantial evidence, to that effect and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence.

As described in Chapter 2, “Description of Preferred Alternative and Equal Weight Alternatives,” this draft EIR evaluates a range of five alternatives at an equal level of detail. This chapter includes an evaluation of the No Project–No CLUO Alternative, compares the environmental impacts of the six alternatives, and identifies the environmentally superior alternative.

## 5.2 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR.

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency’s determination.

The following alternative was considered by Yolo County but is not evaluated further in this draft EIR for the reasons described below.

### 5.2.1 Ban on Commercial Cannabis Operations in the County

Under this alternative, the County would implement a ban on commercial cannabis cultivation operations. No new commercial cannabis cultivation, processing, or distribution facilities would be allowed. This alternative would also result in the cessation of commercial cultivation cannabis operations currently allowed under the Yolo County Code Title 5, Chapter 20 (Marijuana Cultivation Ordinance) and would include the restoration of existing sites to preexisting conditions. Enforcement activities would be undertaken by the County and other agencies, if necessary, to ensure proper closure of existing commercial cannabis cultivation operations.

This alternative was determined early on to be infeasible. It would be inconsistent with the passage of state Proposition 68 and with Yolo County voter passage of Measure K, authorizing the County to impose a general tax on the gross receipts of commercial cannabis activity in unincorporated Yolo County. This alternative also would not be consistent with most of the basic objectives of the project. Project objectives are listed below, with the objectives that clearly would not be met shown in **bold**:

- A. Protect the public health, safety, and welfare.
- B. Protect environmental resources and minimize environmental impact.
- C. Ensure neighborhood compatibility.
- D. **Ensure safe access to medical cannabis for patients.**
- E. Support agricultural economic development including recognition of valuable new crops, preservation of agricultural land, and creation of opportunities for new farmers.

- F. Recognize cannabis as an agricultural crop with unique challenges including Federal classification, legal history, crop value, transaction security, distinct odor, and energy and water requirements.
- G. Recognize competing and evolving community values and interests related to the cannabis industry.
- H. Avoid establishing undesirable precedents for other agricultural sectors.
- I. Avoid unintended consequences including unforeseen community impacts and over-regulation that drives cannabis activities underground.
- J. Allow for adaptation to changing market, cultural, and regulatory considerations over time.
- K. Acknowledge the will of the voters in passing Proposition 64, Marijuana Legalization, in 2016.

### 5.3 NO PROJECT–NO CANNABIS LAND USE ORDINANCE ALTERNATIVE

Evaluation of the No Project Alternative is required under CEQA (CEQA Guidelines Section 15126.6[e]). The purpose of the No Project Alternative is to allow a comparison of the environmental impacts of approving the proposed project with the effects of not approving it. According to Section 15126.6(e)(3) of the CEQA Guidelines, the discussion of the “no project” alternative will usually proceed along one of two lines:

- (A) When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future. Typically, this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.
- (B) If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed.

The No Project–No CLUO Alternative is similar to Alternative 1 in that it assumes continued operation of the 78 cannabis cultivation sites that are currently allowed to cultivate in the County under Yolo County Code Title 5, Chapter 20 (Marijuana Cultivation Ordinance). However, the No Project–No CLUO Alternative would not include the adoption of the proposed CLUO. Rather, it would assume continued operation of those licensed facilities under the existing licensing program (Yolo County Code Title 5, Chapter 20) rather than under the proposed CLUO.

The following discussion compares the impacts of the No Project–No CLUO Alternative with those of the five CLUO alternatives. This analysis provides information sufficient to allow for a meaningful analysis and comparison with the CLUO alternatives.

### AESTHETICS

As identified in Section 3.1, “Aesthetics,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” impacts to scenic viewsheds, state scenic highways, and lighting and glare would be less than significant for all alternatives. This conclusion was based on a determination that the CLUO contains performance standards that include screening requirements (Section 8-2.1408[KK]), native tree retention requirements (Section 8-2.1408[RR]), and lighting restrictions (Sections 8-2.1408[X] and 8-2.1408[Z]). The Marijuana Cultivation Ordinance includes provisions for fencing and controlled lighting to preclude impacts on the night sky; however, the proposed CLUO goes further with additional design and site management requirements. Aesthetic impacts under project, cumulative, and overconcentration conditions related to visual character were conservatively identified as significant and unavoidable for all alternatives in

recognition that cannabis activities have distinct visual characteristics that may affect the aesthetic quality of the surrounding community. Aesthetic impacts under the No Project–No CLUO Alternative are likely to be **greater** than those of Alternative 1 because no CLUO regulations would apply. The No Project–No CLUO Alternative is likely to have **less** impact than Alternative 2, 3, 4, or 5 because it would not expand the number of cannabis activities in the County.

## AGRICULTURAL RESOURCES

No agricultural resource impacts were identified in Section 3.2, “Agricultural Resources,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the five CLUO alternatives. Commercial cannabis uses are considered by the state and County to be agricultural uses and would not result in the loss of farmland or otherwise conflict with existing agricultural uses in the County. This alternative would also not result in significant impacts on agricultural resources because it would retain existing cannabis cultivation sites. However, the No Project–No CLUO Alternative agricultural resource may have impacts that are **greater** than those of Alternative 1, 2, 3, 4, or 5 because the Marijuana Cultivation Ordinance does not include requirements to maintain the cannabis site in a manner that avoids invasive weeds and pests that could affect adjoining agricultural uses, as provided in CLUO Section 8-2.1408(B).

## AIR QUALITY AND ODORS

No significant air quality impacts were identified in Section 3.3, “Air Quality and Odors,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the five CLUO alternatives because they would be required to comply with dust control and energy-saving provisions outlined in Sections 8-2.1408(K), 8-2.1408(L), 8-2.1408(O), 8-2.1408(T), and 8-2.1408(V) of the CLUO, as well as Yolo-Solano Air Quality Management District best management practices. The No Project – No CLUO Alternative would likely have air quality impacts **similar** to those of Alternative 1. It would likely have **less** impact than Alternative 2, 3, 4, or 5 because it would not create new or result in relocated cannabis uses in the County that generate new construction and operational air pollutant emissions.

All of the CLUO alternatives would result in significant and unavoidable odor impacts project, cumulative, and overconcentration conditions. The No Project–No CLUO Alternative could have **greater** odor impacts than Alternative 1, 2, 4, or 5 because it would not include the stringent odor nuisance standards and control requirements of CLUO Sections 8-2.1408(CC) and 8-2.1408(DD). Odor impacts with this alternative are likely to be less than Alternative 3, because Alternative 3 assumes a significantly expanded number of cannabis sites.

## BIOLOGICAL RESOURCES

Significant but mitigable biological resource impacts were identified in Section 3.4, “Biological Resources,” for all alternatives. These impacts would be mitigated for all alternatives through compliance with CLUO performance standards, State Water Resources Control Board Order WQ 2019-0001-DWQ, and implementation of mitigation identified in Section 3.4. This conclusion was based on a determination that the CLUO and mitigation contain protection standards for special-status species and habitat and required participation in the Yolo Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP). No significant biological resource impacts were identified in Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration.”

The No Project–No CLUO Alternative is likely to have **greater** biological resource impacts than Alternative 1 under mitigated conditions because it would not include the protection measures of the CLUO, including Sections 8-2.1408(D) and 8-2.1408(RR), which would protect on-site special-status species and habitats, require participation in the Yolo HCP/NCCP, and include tree protection measures. This alternative would also not provide for restoration of cultivation sites that cease operations as required under CLUO Section 8-2.1412(C). The No Project–No CLUO Alternative would likely have **less** impact than Alternative 2, 3, 4, or 5

because it would retain the existing cultivation sites and would not create new cannabis uses in the County that could adversely affect biological resources.

## CULTURAL RESOURCES

No significant archaeological, historical, or tribal cultural resource impacts were identified in Section 3.5, “Cultural Resources,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for the all alternatives based on compliance with CLUO performance standards. The No Project–No CLUO Alternative is likely to have **greater** cultural resource impacts than Alternative 1 under mitigated conditions because it would not include the protection measures of the CLUO. The No Project–No CLUO Alternative would likely have **less** impact than Alternative 2, 3, 4, or 5 because it would not expand cannabis uses in the County, require relocation of existing operations, or allow noncultivation uses, and would therefore avoid new archaeological, historical, and tribal cultural resources and would

## ENERGY

No significant impacts related to energy use were identified in Section 3.6, “Energy,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards that require renewable energy use (CLUO Sections 8-2.1408[O], 8-2.1408[F], 8-2.1408[T], and 8-2.1408[Z]). The No Project–No CLUO Alternative would likely result in **greater** energy impacts than Alternative 1 because it would not include the CLUO requirements for renewable energy use. This alternative would likely have **less** impact than Alternative 2, 3, 4, or 5 because it would not expand cannabis uses that could affect energy usage in the County.

## GEOLOGY AND SOILS

No significant impacts related to geology and soils were identified in Section 3.7, “Geology and Soils,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards and State Water Resources Control Board Order WQ 2019-0001-DWQ. This alternative would likely have **greater** impact than Alternative 1 because it would not include the CLUO requirements for geology and soils. The No Project–No CLUO Alternative may have **less** impact than Alternative 2, 3, 4, or 5 because it would not expand cannabis uses in the County, require relocation of existing operations, or allow noncultivation uses in the County that could affect soil conditions or paleontological resources from relocated or new cannabis uses.

## GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

As identified in Section 3.8, “Greenhouse Gas Emissions and Climate Change,” and Section 4.1 “Cumulative Impacts,” all of the alternatives would result in significant but mitigatable impacts from increases in greenhouse gas (GHG) emissions. These impacts are mitigated for all alternatives through compliance the County Climate Change Plan and with CLUO performance standards. This conclusion was based on a determination that the CLUO and mitigation contain requirements for the use of renewable energy and compliance with the Yolo County Climate Action Plan. No significant GHG impacts were identified in Section 4.2, “Overconcentration.” This alternative would likely have a **greater** impact than Alternative 1 under mitigated conditions because it would not include the requirements of CLUO Section 8-2.1408(O) to use 50-percent renewable energy, and it would not implement Sections 8-2.1408(F) and 8-2.1408(Z), which address GHG emissions through energy use. The No Project–No CLUO Alternative may have **less** impact than Alternative 2, 3, 4, or 5 because it would not create new cannabis uses in the County that would generate GHG emissions.

## HAZARDS AND HAZARDOUS MATERIALS

No significant impacts related to hazards were identified in Section 3.9, “Hazards and Hazardous Materials,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards and state standards. The No Project–No CLUO Alternative would likely have a **greater** impact on hazards and hazardous materials than Alternative 1 because it would not include CLUO Sections 8-2.1408(A), 8-2.1408(W), 8-2.1408(CC), and 8-2.1408(OO), which include standards regarding the use of pesticides and the handling of hazardous materials, or Sections 8-2.1408(F), 8-2.1408(K), and 8-2.1408(Q), regarding fire protection and emergency access that address wildland fire hazards. The No Project–No CLUO Alternative may have **less** impact than Alternative 2, 3, 4, or 5 because it would not create new cannabis uses in the County that may use hazardous materials.

## HYDROLOGY AND WATER QUALITY

One significant impact related to compliance with water quality plans was identified in Section 3.10, “Hydrology and Water Quality,” for all alternatives. All alternatives could result in significant but mitigatable impacts from conflicts with a water quality control plan. Mitigation would be achieved through compliance with CLUO performance standards, including modifications identified in mitigation measures. This conclusion was based on a determination that the CLUO contains water quality protections that are more stringent than applicable state law. No significant hydrology impacts were identified in Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration.” The No Project–No CLUO Alternative would not include the more stringent protections afforded by the CLUO but would include compliance with state regulations regarding water quality under State Water Resources Control Board Order WQ 2019-0001-DWQ. Therefore, hydrology and water quality effects under the No Project–No CLUO Alternative would likely have **greater** impacts than those of Alternative 1 under mitigated conditions. The No Project–No CLUO Alternative may have **less** impact associated with groundwater and flooding than Alternative 2, 3, 4, or 5 because it would not create new cannabis uses in the County that could generate new groundwater demands or drainage impacts.

## LAND USE AND PLANNING

No land use or population/housing impacts were identified in Section 3.11, “Land Use and Planning,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives. The No Project–No CLUO Alternative’s impact on population and housing would likely be **similar** to that of Alternative 1 because it would not increase employment. This alternative may have **less** impact on population and housing than Alternative 2, 3, 4, or 5 because it would not generate additional employment from new cannabis uses.

## NOISE

Significant but mitigable construction noise impacts were identified in Section 3.12, “Noise,” for all alternatives through mitigation that would limit construction hours and noise generation. No significant traffic and stationary noise impacts would occur under any of the alternatives. No significant noise impacts were identified in Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration.” The No Project–No CLUO Alternative would likely have **greater** impact from operational noise than Alternative 1, 2, 3, 4, or 5 because it does not include proposed noise controls included in the CLUO.

## PUBLIC SERVICES

No significant public service impacts were identified in Section 3.13, “Public Services and Recreation,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards and state regulations. The No Project–No CLUO Alternative would likely have a **greater** impact than Alternative 1 because it would not implement CLUO Sections 8-2.1408(F), 8-2.1408(K), 8-2.1408(Q), and 8-2.1408(FF), which include more stringent controls related to fire safety. This alternative may have **less** impact on population and housing than Alternative 2, 3, 4, or 5 because it would not generate public service demand associated with new cannabis uses.

## TRANSPORTATION AND CIRCULATION

No significant impacts related to traffic operations, consistency with County General Plan transportation policies, or vehicle miles traveled (VMT) were identified in Section 3.14, “Transportation and Circulation,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives. The No Project–No CLUO Alternative’s traffic impacts would likely be **greater** than those of Alternative 1 because it would not implement CLUO standards that would promote trip reduction (Sections 8-2.1480[N] and 8-2.1408[J]). This alternative would likely have **less** impact than Alternative 2, 3, 4, or 5 because it would not create new cannabis uses in the County that would generate new traffic.

## UTILITIES AND SERVICE SYSTEMS

No significant utility service impacts were identified in Section 3.15, “Utilities and Service Systems,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards and state regulations. This alternative could have impacts **greater** than those of Alternative 1 because it does not include the controls built into the CLUO. The No Project–No CLUO Alternative would likely have **less** impact than Alternative 2, 3, 4, or 5 because it would retain the existing cultivation sites and would not create new cannabis uses in the County that would generate new demand for utility services.

## 5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Under unmitigated conditions, Alternative 1 is generally similar to the No Project Alternative but with the CLUO in effect. The CLUO is a robust and comprehensive set of proposed regulations, strengthened further by the modifications identified in the mitigation measures. Therefore, overall, Alternative 1 would be environmentally superior to the No Project Alternative under both mitigated and unmitigated conditions.

Under unmitigated conditions, Alternative 1 assumes slightly less cultivation and no noncultivation uses as compared to Alternatives 2, 4, and 5. Alternatives 2, 4, and 5 share the same assumptions for amount of cultivation, which would be slightly higher than for Alternative 1 and therefore may result in slightly greater impacts overall. Alternatives 2, 4, and 5 assume the same noncultivation uses. The main differences between Alternatives 2, 4, and 5 are that Alternative 4 assumes all uses occur indoors, and Alternative 5 assumes no retail and that all uses occur on agricultural zoned parcels. This means in general that most impacts under Alternatives 2, 4, and 5 would be similar when compared to each other, and they are likely to be greater than what would occur under Alternative 1. Key exceptions would be that Alternative 4 is likely to have lower impacts than all other alternatives for odor as a result of the assumption that all uses occur indoors under this alternative. Under unmitigated conditions (i.e., without implementation of odor control measures, such as carbon filters and scrubbers), odor released from a greenhouse can be more concentrated. Under unmitigated conditions, Alternative 3 assumes double the amount of cannabis uses in all categories and would have greater impacts in all categories than the other four alternatives as a result.

In sum, comparing the five equal-weight alternatives and the No Project–No CLUO Alternative, under unmitigated conditions, Alternative 1 would be environmentally superior overall. Alternative 4 would likely be the second most environmentally superior overall but likely better than Alternative 1 with respect solely to odor. Alternative 3 would be the least environmentally superior comparatively, in all areas. Alternatives 2 and 5 would fall between Alternatives 1 and 3.

It is important to note, however, that under mitigated conditions, Alternatives 1, 2, 4, and 5 perform similarly with all areas of impact, except aesthetics and odor, being mitigated to acceptable levels. Therefore, under mitigated conditions, Alternatives 1, 2, 4, and 5 are relatively equivalent to each other and arguably environmentally superior individually when compared to the No Project–No CLUO Alternative and Alternative 3.

Odor is conservatively identified as a significant and unavoidable impact for all alternatives despite application of the CLUO provisions because some amount of odor would occur and because odor, for a variety of reasons, is a subject of significant controversy by residents due to proximate exposure, subjective reactions, cultural concerns, and lack of certainty in the emerging field of cannabis odor analysis and control. This is true for all geographies analyzed in the DEIR: see Section 3.3, “Air Quality and Odors,” regarding odor at the project level; see Section 4.1 regarding cumulative odor effects; and see Section 4.2, “Overconcentration,” regarding odor impacts within smaller geographic sub-regions.

The potential for aesthetics impacts related to visual character is similarly identified as significant and unavoidable for all alternatives despite application of the CLUO provisions because aesthetic impacts are subjective, and cannabis uses have distinctly recognizable visual characteristics as compared to other traditional forms of agriculture in the County. This is true for all geographies analyzed in the DEIR: see Section 3.1, “Aesthetics,” regarding visual character at the project level; see Section 4.1, “Cumulative Impacts,” regarding cumulative visual character effects; and see Section 4.2, “Overconcentration,” regarding visual character impacts within smaller geographic sub-regions.

The following analysis compares each of the five alternatives by environmental topic. Table 5-1 summarizes the impact comparison to Alternative 1 (CEQA Preferred Alternative). Environmental effects associated with overconcentration—i.e., the concentration of clusters of cannabis uses in discrete geographic areas of the County—are also summarized in Table 5-1, and Chapter 4.2 provides a detailed analysis of such effects.

**Table 5-1 CLUO Alternatives Impact Comparisons**

| Alternatives Evaluated               | Alternative 1:<br>Cultivation (CEQA Preferred Alternative) | Alternative 2:<br>All License Types with Moderate Limits | Alternative 3:<br>All License Types with High Limits | Alternative 4:<br>Mixed-Light/Indoor Types Only | Alternative 5:<br>All License Types with Moderate Limits with No Retail and Ag Zone Only | No Project—No CLUO Alternative |
|--------------------------------------|--|--|--|---|--|--------------------------------|
| Assumed Cannabis Uses                | 78 cult  | 80 cult<br>52 noncult                                    | 160 cult<br>104 noncult                              | 80 cult<br>52 noncult                           | 80 cult<br>50 noncult  | 78 cult                        |
| Impacts                              | Level of Significance After Mitigation                     | Comparison to Alternative 1                              |  |   |  |                                |
| <b>Aesthetic Impacts</b>             |  |  |  |   |  |                                |
| AES-1: Scenic Vista                  | LTS  | =  | >  | =   | =  | ≥                              |
| AES-2: Scenic Highway                | LTS  | =  | >  | =   | =  | ≥                              |
| AES-3: Visual Character              | SUI  | =  | >  | =   | =  | ≥                              |
| AES-4: Light and Glare               | LTS  | =  | >  | =   | =  | ≥                              |
| CUM-1: Cumulative                    | SUI  | =  | >  | =   | =  | ≥                              |
| OVC-1: Overconcentration             | SUI  | =  | >  | =   | =  | >                              |
| <b>Agricultural Resource Impacts</b> |  |  |  |   |  |                                |
| AG-1: Farmland Loss                  | LTS  | =  | =  | =   | =  | ≥                              |
| AG-2: Conflict with Zoning           | LTS  | =  | =  | =   | =  | ≥                              |
| AG-3: Conflicts with Ag              | LTS  | =  | =  | =   | =  | ≥                              |
| AG-4: Conflicts with GP              | LTS  | =  | =  | =   | =  | ≥                              |
| CUM-2: Cumulative                    | LTS  | =  | =  | =   | =  | ≥                              |
| OVC-2: Overconcentration             | LTS  | =  | =  | =   | =  | ≥                              |
| <b>Air Quality and Odor Impacts</b>  |  |  |  |   |  |                                |
| AQ-1: Conflict with Policies         | LTS  | =  | =  | =   | =  | =                              |
| AQ-2: Construction                   | LTS  | =  | =  | =   | =  | =                              |
| AQ-3: Operational                    | LTS  | =  | =  | =   | =  | =                              |
| AQ-4: Odors                          | SUI  | =  | >  | <   | =  | >                              |



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| Alternatives Evaluated                           | Alternative 1:<br>Cultivation (CEQA Preferred Alternative) | Alternative 2:<br>All License Types with Moderate Limits | Alternative 3:<br>All License Types with High Limits | Alternative 4:<br>Mixed-Light/Indoor Types Only | Alternative 5:<br>All License Types with Moderate Limits with No Retail and Ag Zone Only | No Project-<br>No CLUO Alternative |
|--|--|--|--|---|--|------------------------------------|
| Assumed Cannabis Uses                            | 78 cult  | 80 cult<br>52 noncult                                    | 160 cult<br>104 noncult                              | 80 cult<br>52 noncult                           | 80 cult<br>50 noncult  | 78 cult                            |
| Impacts  | Level of Significance After Mitigation                     | Comparison to Alternative 1                              |  |   |  |                                    |
| CUM-3: Cumulative                                | SUI  | =  | >  | <   | =  | >                                  |
| OVC-3: Overconcentration                         | SUI  | >  | >  | ≤   | ≥  | >                                  |
| <b>Biological Resource Impacts</b>               |  |  |  |   |  |                                    |
| BIO-1: SS Species                                | LTS  | =  | >  | =   | =  | ≥                                  |
| BIO-2: Riparian                                  | LTS  | =  | >  | =   | =  | ≥                                  |
| BIO-3: Wetlands                                  | LTS  | =  | >  | =   | =  | ≥                                  |
| BIO-4: Wildlife Movement                         | LTS  | =  | >  | =   | =  | ≥                                  |
| BIO-5: Conflict with Policies                    | NI   | =  | =  | =   | =  | =                                  |
| BIO-6: Conflict with Yolo HCP/NCCP               | NI   | =  | =  | =   | =  | =                                  |
| BIO-7: Reduce Species                            | LTS  | =  | >  | =   | =  | ≥                                  |
| CUM-4: Cumulative                                | LTS  | =  | >  | =   | =  | ≥                                  |
| OVC-4: Overconcentration                         | LTS  | =  | >  | =   | =  | ≥                                  |
| <b>Cultural Resource Impacts</b>                 |  |  |  |   |  |                                    |
| CULT-1: Historic Resources                       | LTS  | =  | >  | =   | =  | ≥                                  |
| CULT-2: Arch Resources                           | LTS  | =  | >  | =   | =  | ≥                                  |
| CULT-3: Human Remains                            | LTS  | =  | >  | =   | =  | ≥                                  |
| CULT-4: TCR                                      | LTS  | =  | >  | =   | =  | ≥                                  |
| CUM-5: Cumulative                                | LTS  | =  | >  | =   | =  | ≥                                  |
| OVC-5: Overconcentration                         | LTS  | =  | >  | =   | =  | ≥                                  |
| <b>Energy Impacts</b>                            |  |  |  |   |  |                                    |
| ENE-1: Use of Energy                             | LTS  | >  | >  | >   | >  | ≥                                  |
| ENE-2: Conflict with Plans                       | LTS  | >  | >  | >   | >  | ≥                                  |
| CUM-6: Cumulative                                | LTS  | >  | >  | >   | >  | ≥                                  |
| OVC-6: Overconcentration                         | LTS  | >  | >  | >   | >  | ≥                                  |
| <b>Geology and Soils Impacts</b>                 |  |  |  |   |  |                                    |
| GEO-1: Soil Erosion                              | LTS  | =  | >  | =   | =  | ≥                                  |
| GEO-2: Geologic Stability                        | LTS  | =  | >  | =   | =  | ≥                                  |
| GEO-3: Paleo Resources                           | LTS  | =  | >  | =   | =  | ≥                                  |
| GEO-4: Mineral Resources                         | LTS  | =  | >  | =   | =  | ≥                                  |
| CUM-7: Cumulative                                | LTS  | =  | >  | =   | =  | ≥                                  |
| OVC-7: Overconcentration                         | LTS  | =  | >  | =   | =  | ≥                                  |
| <b>Greenhouse Gas and Climate Change Impacts</b> |  |  |  |   |  |                                    |
| GHG-1: GHG Emissions                             | LTS  | >  | >  | >   | >  | ≥                                  |
| CUM-8: Cumulative                                | LTS  | >  | >  | >   | >  | ≥                                  |
| OVC-8: Overconcentration                         | LTS  | >  | >  | >   | >  | ≥                                  |

**Table 5-1 CLUO Alternatives Impact Comparisons**

| Alternatives Evaluated                         | Alternative 1:<br>Cultivation (CEQA<br>Preferred<br>Alternative) | Alternative 2:<br>All License Types<br>with Moderate<br>Limits | Alternative 3:<br>All License Types<br>with High Limits | Alternative 4:<br>Mixed-Light/Indoor<br>Types Only | Alternative 5:<br>All License Types with<br>Moderate Limits with No<br>Retail and Ag Zone Only | No Project-<br>No CLUO<br>Alternative |
|--|--|--|---|--|--|---------------------------------------|
| Assumed Cannabis Uses                          | 78 cult  | 80 cult<br>52 noncult  | 160 cult<br>104 noncult                                 | 80 cult<br>52 noncult                              | 80 cult<br>50 noncult  | 78 cult                               |
| Impacts  | Level of<br>Significance After<br>Mitigation                     | Comparison to Alternative 1                                    |   |  |  |                                       |
| <b>Hazards and Hazardous Materials Impacts</b> |  |  |   |  |  |                                       |
| HAZ-1: Create Hazard                           | LTS  | =  | >   | =  | =  | ≥                                     |
| HAZ-2: Upset                                   | LTS  | =  | >   | =  | =  | ≥                                     |
| HAZ-3: Emit Hazards                            | LTS  | =  | >   | =  | =  | ≥                                     |
| HAZ-4: Airport Hazards                         | LTS  | =  | >   | =  | =  | ≥                                     |
| HAZ-5 Emergency Resp                           | LTS  | =  | >   | =  | =  | ≥                                     |
| HAZ-6: Wildfire Hazards                        | LTS  | =  | >   | =  | =  | ≥                                     |
| CUM-9: Cumulative                              | LTS  | =  | >   | =  | =  | ≥                                     |
| OVC-9: Overconcentration                       | LTS  | =  | >   | =  | =  | ≥                                     |
| <b>Hydrology and Water Quality Impacts</b>     |  |  |   |  |  |                                       |
| HYDRO-1: Water Quality                         | LTS  | =  | >   | =  | =  | ≥                                     |
| HYDRO-2: Groundwater                           | LTS  | =  | >   | =  | =  | ≥                                     |
| HYDRO-3: Drainage                              | LTS  | =  | >   | =  | =  | ≥                                     |
| HYDRO-4: Water Q Plan                          | LTS  | =  | >   | =  | =  | ≥                                     |
| CUM-10: Cumulative                             | LTS  | =  | >   | =  | =  | ≥                                     |
| OVC-10: Overconcentration                      | LTS  | =  | >   | =  | =  | ≥                                     |
| <b>Land Use and Planning Impacts</b>           |  |  |   |  |  |                                       |
| LU-1: Community Division                       | LTS  | =  | =   | =  | =  | ≤                                     |
| LU-2: Conflict with Plans                      | LTS  | =  | =   | =  | =  | ≤                                     |
| LU-3: Population Growth                        | LTS  | =  | =   | =  | =  | ≤                                     |
| CUM-11: Cumulative                             | LTS  | =  | =   | =  | =  | ≤                                     |
| OVC-11: Overconcentration                      | LTS  | =  | =   | =  | =  | ≤                                     |
| <b>Noise Impacts</b>                           |  |  |   |  |  |                                       |
| NOI-1: Construction Noise                      | LTS  | =  | >   | =  | =  | ≥                                     |
| NOI-2: Non-Trans Noise                         | LTS  | =  | >   | =  | =  | ≥                                     |
| NOI-3: Traffic Noise                           | LTS  | =  | >   | =  | =  | ≥                                     |
| CUM-12: Cumulative                             | LTS  | =  | >   | =  | =  | ≥                                     |
| OVC-12: Overconcentration                      | LTS  | =  | >   | =  | =  | ≥                                     |
| <b>Public Services Impacts</b>                 |  |  |   |  |  |                                       |
| PS-1: Fire Protection                          | LTS  | =  | >   | =  | =  | ≥                                     |
| PS-2: Law Enforcement                          | LTS  | =  | >   | =  | =  | ≥                                     |
| CUM-13: Cumulative                             | LTS  | =  | >   | =  | =  | ≥                                     |
| OVC-13: Overconcentration                      | LTS  | =  | >   | =  | =  | ≥                                     |
| <b>Transportation and Circulation Impacts</b>  |  |  |   |  |  |                                       |
| TRANS-1: Plan Conflict                         | LTS  | =  | >   | =  | =  | ≥                                     |
| TRANS-2: Changes in VMT                        | LTS  | =  | >   | =  | =  | ≥                                     |

**Table 5-1 CLUO Alternatives Impact Comparisons**

| Alternatives Evaluated                       | Alternative 1:<br>Cultivation (CEQA Preferred Alternative) | Alternative 2:<br>All License Types with Moderate Limits | Alternative 3:<br>All License Types with High Limits | Alternative 4:<br>Mixed-Light/Indoor Types Only | Alternative 5:<br>All License Types with Moderate Limits with No Retail and Ag Zone Only | No Project-<br>No CLUO Alternative |
|--|--|--|--|---|--|------------------------------------|
| Assumed Cannabis Uses                        | 78 cult  | 80 cult<br>52 noncult                                    | 160 cult<br>104 noncult                              | 80 cult<br>52 noncult                           | 80 cult<br>50 noncult  | 78 cult                            |
| Impacts                                      | Level of Significance After Mitigation                     | Comparison to Alternative 1                              |  |   |  |                                    |
| CUM-14: Cumulative                           | LTS  | =  | >  | =   | =  | ≥                                  |
| OVC-14: Overconcentration                    | LTS  | =  | >  | =   | =  | ≥                                  |
| <b>Utilities and Service Systems Impacts</b> |  |  |  |   |  |                                    |
| UTIL-1: Wastewater                           | LTS  | =  | >  | =   | =  | ≥                                  |
| UTIL-2: Water Service                        | LTS  | =  | >  | =   | =  | ≥                                  |
| UTIL-3: Solid Waste Service                  | LTS  | =  | >  | =   | =  | ≥                                  |
| CUM-15: Cumulative                           | LTS  | =  | >  | =   | =  | ≥                                  |
| OVC-15: Overconcentration                    | LTS  | =  | >  | =   | =  | ≥                                  |

Notes:

- < The alternative would have a lesser impact than Alternative 1
- > The alternative would have a greater impact than Alternative 1
- = The alternative would have a similar impact to Alternative 1
- ≤ The alternative would have a lesser or similar impact to Alternative 1
- ≥ The alternative would have a greater or similar impact to Alternative 1

cult=cultivation; noncult=noncultivation; LTS=less than significant; NI=no impact; SUI=significant and unavoidable

Source: Prepared by Ascent Environmental in 2019

## AESTHETICS

As identified in Section 3.1, “Aesthetics,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” impacts to scenic viewsheds, state scenic highways, and lighting and glare would be less than significant for all alternatives. Aesthetic impacts related to visual character were conservatively identified as significant and unavoidable for all alternatives under project, cumulative, and overconcentration conditions in recognition that cannabis activities have distinct visual characteristics that may affect the aesthetic quality of the surrounding community. Because Alternative 1 would not result in an expansion of cannabis uses in the County and would include implementation of the CLUO, it would be environmentally superior to the other alternatives. with respect to aesthetic impacts. Alternatives 2, 3, 4, and 5 would allow an increased number of cannabis uses including new noncultivation uses (nurseries, processing facilities, manufacturing, testing, distribution, retail, and microbusiness). Compliance with CLUO performance standards would result in relatively similar impact conditions for Alternatives 1, 2, 4, and 5. Alternative 3 would be the least environmentally superior alternative due to the increased number of assumed cannabis uses (264 uses).

## AGRICULTURAL RESOURCES

No agricultural resource impacts were identified in Section 3.2, “Agricultural Resources,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives. Commercial cannabis uses were determined to be agricultural uses and would not result in the loss of farmland or otherwise conflict with existing agricultural uses in the County. Alternative 1 would retain the existing 78 cultivation sites that are currently allowed under Yolo County Code and would not allow any new cultivation

or noncultivation cannabis uses. Alternatives 2, 3, 4, and 5 would introduce new cultivation and noncultivation cannabis uses (nurseries, processing facilities, manufacturing, testing, distribution, retail, and microbusiness) into the County. As noted in the discussions of the impacts, these noncultivation uses are similar in character to other agricultural land uses, such as agricultural sales, wineries, breweries, and processing (e.g., olive oil production and canneries). Thus, alternatives 1 through 5 would all include implementation of the CLUO and would be similar in regard to agricultural resource impacts.

## **AIR QUALITY AND ODORS**

No significant air quality impacts were identified in Section 3.3, “Air Quality and Odors,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives because they would retain most of the existing cultivation sites and would be required to comply with Sections 8-2.1408(K), 8-2.1408(L), 8-2.1408(O), 8-2.1408(T), and 8-2.1408(V) of the CLUO, as well as Yolo-Solano Air Quality Management District best management practices. Air quality impacts would be similar for Alternatives 1, 2, 3, 4, and 5, with Alternative 1 likely the environmentally superior alternative because it assumes the CLUP controls with the least number of new cannabis uses.

As identified in Section 3.3, “Air Quality and Odors,” Section 4.1, “Cumulative Impacts,” and Section 4.2, “Overconcentration,” all of the CLUO alternatives would result in significant and unavoidable odor impacts even with application of zoning, buffer requirements, and odor control requirements of CLUO Sections 8-2.1408(CC) and 8-2.1408(DD). Alternative 1 would not result in an expansion of cannabis uses in the County that could generate odors. Alternatives 2 and 5 would have similar odor impacts given the similar extent of cannabis uses. Alternative 3 would be the least environmentally superior alternative due to the extent of assumed cannabis uses that could create odor impacts. Alternative 4 would likely be the environmentally superior alternative for odor impacts because all cannabis uses would be in buildings or greenhouses that would better control odors through carbon filters, scrubbers, or other technology.

## **BIOLOGICAL RESOURCES**

Significant but mitigable biological resource impacts were identified in Section 3.4, “Biological Resources,” for all alternatives. These impacts would be mitigated for all alternatives through compliance with CLUO performance standards, State Water Resources Control Board Order WQ 2019-0001-DWQ, and implementation of mitigation identified in Section 3.4. No significant biological resource impacts were identified in Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration.” As identified in Table 2-4 and in the discussion of Impact BIO-1, Alternative 3 would disturb the most land area and therefore could result in the largest extent of potential biological resource impacts; the land disturbance acreages and associated impacts under Alternatives 2, 4, and 5 would be similar for the three alternatives. Alternative 1 land disturbance would be limited to construction related to the relocation of nine existing operations to comply with the CLUO, making it environmentally superior overall with regard to impacts to biological resources.

## **CULTURAL RESOURCES**

No significant archaeological, historical, or tribal cultural resource impacts were identified in Section 3.5, “Cultural Resources,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards. As identified in Table 2-4, Alternative 3 would disturb the most land area and therefore could result in the largest extent of potential archaeological, historical, and tribal resource impacts; the land disturbance acreages and associated impacts under Alternatives 2, 4, and 5 would be similar for the three alternatives. Alternative 1 land disturbance would be limited to modification of existing cultivation sites that may be required to comply with the CLUO, making it environmentally superior overall with regard to impacts to cultural resources.

## ENERGY

No significant impacts related to energy use were identified in Section 3.6, “Energy,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards. Tables 4-12, 4-13, 4-14, 4-15, and 4-16 provide total energy use for each alternative. Alternative 1 would use less energy for construction activities compared to Alternatives 2, 3, 4 and 5, since the only construction would be associated with the nine assumed relocations due to CLUO zoning standards. In addition, the energy use associated with the operations of Alternative 1 would be less than the other alternatives. Given this, Alternative 1 would likely be the environmentally superior alternative associated with energy use.

## GEOLOGY AND SOILS

No significant impacts related to geology and soils were identified in Section 3.7, “Geology and Soils,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards and state regulations. As identified in Table 2-4, Alternative 3 would disturb the most land area and could result in soil disturbance and potential paleontological resource impacts; the land disturbance acreages and associated impacts under Alternatives 2, 4, and 5 would be similar for the three alternatives. Alternative 1 land disturbance would be limited to relocation of nine operations to comply with the CLUO, making it the environmentally superior alternative with regard to geology and soils impacts.

## GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

As identified in Section 3.8, “Greenhouse Gas Emissions and Climate Change,” and Section 4.1 “Cumulative Impacts,” all of the alternatives would result in significant but mitigatable impacts from increases in greenhouse gas (GHG) emissions. No significant GHG impacts were identified in Section 4.2, “Overconcentration.” Alternative 1 would produce less GHG emissions during construction compared to Alternatives 2, 3, 4 and 5, since the only construction activities would be the nine assumed relocations due to CLUO zoning standards. There would be no new cannabis use construction associated with Alternative 1. In addition, the GHG emissions associated with the operations of Alternative 1 would be less than the other alternatives. Given this, Alternative 1 would likely be the environmentally superior alternative associated with GHG emissions and climate change.

## HAZARDS AND HAZARDOUS MATERIALS

No significant impacts related to hazards were identified in Section 3.9, “Hazards and Hazardous Materials,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards and state standards. Implementation of CLUO Sections 8-2.1408(A), 8-2.1408(W), 8-2.1408(CC), and 8-2.1408(OO), which consist of standards regarding the use of pesticides and the handling of hazardous materials, and Sections 8-2.1408(F), 8-2.1408(K), and 8-2.1408(Q), regarding fire protection and emergency access that address wildland fire hazards, would result in similar hazard impacts for alternatives 1, 2, 4, and 5, with Alternative 1 likely the environmentally superior alternative because it assumes the CLUP controls with the least number of new cannabis uses. Alternative 3 would be the least environmentally superior alternative due to the increased number of assumed cannabis uses (264 uses).

## HYDROLOGY AND WATER QUALITY

One significant impact related to compliance with water quality plans was identified in Section 3.10, “Hydrology and Water Quality,” for all alternatives. All alternatives would result in significant but mitigable impacts from conflicts with a water quality control plan. Mitigation for all alternatives would be achieved through compliance with CLUO performance standards, including modifications identified in mitigation measures. No significant hydrology impacts were identified in Section 4.1 “Cumulative Impacts,” and

Section 4.2, “Overconcentration.” As identified in Table 2-4, Alternative 3 would disturb the most land area and could the largest extent of potential water resource and groundwater impacts; the land disturbance acreages and associated water resource and groundwater impacts under Alternatives 2, 4, and 5 would be similar for the three alternatives. Alternative 1 would likely be environmentally superior with regard to hydrology and water quality because it assumes implementation of the CLUP regulations and the least number of new cannabis uses.

## LAND USE AND PLANNING

No land use or population/housing impacts were identified in Section 3.11, “Land Use and Planning,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives. Implementation of the CLUO would result in refinements to the Yolo County General Plan and Yolo County Code to acknowledge cannabis as a legal commercial crop and would not conflict with County policies and regulations related to the promotion and protection of agricultural land uses. As noted in the discussion of Impact 3.11-2, Alternative 3 would generate the highest full-time employment at 2,819 employees. Alternative 4 would generate 2,815 full-time employees, while Alternative 2 would generate 1,145 employees and Alternative 5 would generate 1,382 employees. Alternative 1 would be the lowest at 683 full-time employees, making it the environmentally superior alternative with respect to land use and planning.

## NOISE

Significant but mitigable construction noise impacts were identified in Section 3.12, “Noise,” for all alternatives through mitigation that would limit construction hours and noise generation. No significant traffic and stationary noise impacts would occur under any of the alternatives. No significant noise impacts were identified in Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration.” As noted in the discussion of NOI-3, Alternative 1 would not result in significant traffic noise increases, thus making it environmentally superior to the other alternatives. Alternatives 2, 4, and 5 would result in traffic noise increases that would not be audible; thus, the impact would be similar to that of Alternative 1. Alternative 3 would generate a potentially audible increase on one roadway segment.

## PUBLIC SERVICES

No significant public service impacts were identified in Section 3.13, “Public Services,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards and state regulations. Alternative 1 would retain existing cultivation sites only and would generate no new public service demand, thus making it environmentally superior as compared to the other alternatives. Alternative 3 would result in the largest number of new cannabis uses in the County and could create the greatest demand for additional public services; the extent of new cannabis uses and associated increases in public service demand under Alternatives 2, 4, and 5 would be similar for the three alternatives.

## TRANSPORTATION AND CIRCULATION

No significant impacts related to traffic operations, consistency with County General Plan transportation policies, or VMT were identified in Section 3.14, “Transportation and Circulation,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives. Traffic from assumed cannabis uses under Alternatives 1, 2, and 4 would result in similar traffic operation conditions, with Alternative 1 environmentally superior overall. Projected traffic operations impacts under Alternative 3 for existing and future traffic scenarios would likely be greater as compared to the other alternatives (see Tables 6 and 7 in Appendix G). Consistency with general plan transportation policies would be similar for all alternatives.

## UTILITIES AND SERVICE SYSTEMS

No significant utility service impacts were identified in Section 3.15, “Utilities and Service Systems,” Section 4.1 “Cumulative Impacts,” and Section 4.2, “Overconcentration,” for any of the alternatives through compliance with CLUO performance standards and state regulations. Alternative 1 would retain existing cultivation sites only and would generate no new utility demand thus making it environmentally superior. Alternative 3 would result in the largest number of new cannabis uses in the County and could create the greatest demand for additional solid waste service. The number of new cannabis uses and associated increases in solid waste service under Alternatives 2, 4, and 5 would be similar for the three alternatives.

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