

## 2.15 Public Services

This section provides an overview of existing public services provided in the unincorporated area of San Diego County and evaluates the potential for implementation of the Cannabis Program to affect availability, service level, or capacity of public services, including fire protection services, police protection services, parks and recreation, public schools, and libraries. Utility impacts are addressed in Section 2.19, “Utilities and Service Systems,” and wildfire impacts are addressed in Section 2.20, “Wildfire.”

No comment letters regarding public services were received in response to the notice of preparation (NOP) or during the scoping meeting. All comments received in response to the NOP are presented in Appendix A of this Draft PEIR.

A summary of impacts evaluated in this section is provided in Table 2.15.1.

**Table 2.15.1 Public Services Summary of Impacts**

Issue Number	Issue Topic	Project Direct Impact	Project Cumulative Impact	Impact after Mitigation
1	Fire Protection Services	Alternative 1: No Impact Alternatives 2-5: Less than Significant	Alternative 1: No Impact Alternatives 2-5: Less than Significant	Alternative 1: No Impact Alternatives 2-5: Less than Significant
2	Police Protection Services	Alternative 1: No Impact Alternatives 2-5: Less than Significant	Alternative 1: No Impact Alternatives 2-5: Less than Significant	Alternative 1: No Impact Alternatives 2-5: Less than Significant

### 2.15.1 Existing Conditions

#### 2.15.1.1 *Fire Protection*

Fire and emergency medical services are provided by Fire Protection Districts (FPDs), County Service Areas (CSAs), and the California Department of Forestry and Fire Protection (CAL FIRE), and generally each agency is responsible for structural fire protection and wildland fire projection within their respective area of responsibility (County of San Diego 2009). There are also mutual aid and automatic aid agreements that enable non-lead fire agencies to respond to fire emergencies outside of their normal jurisdictional boundaries.

According to CAL FIRE’s State Responsibility Area Fire Hazard Severity Zones map (most recently updated June 15, 2023), a substantial portion of the unincorporated area of San Diego County is located within Very High, High, and Moderate Fire Hazard Severity Zones (CAL FIRE 2023).

There are over two dozen fire agencies that serve the unincorporated county, including:

- Alpine FPD;
- Bonita-Sunnyside FPD;
- Borrego Springs FPD;
- Deer Springs FPD;

- Lakeside FPD;
- Lower Sweetwater FPD
- North County FPD;
- Ramona Municipal Water District;
- Rancho Santa Fe FPD;
- Rincon Del Diablo Municipal Water District;
- San Diego County FPD
- San Marcos FPD;
- San Miguel Consolidated FPD;
- Valley Center FPD;
- Vista FPD; and
- Yuima, Mootamai, and Pauma Municipal Water Districts.

### **County Service Areas**

CSAs are classified as special districts formed within the county to provide park maintenance, fire suppression services, and paramedic services. The San Diego County Fire Protection District takes administrative oversight responsibility for fire prevention measures in all of the CSAs. CSAs have defined boundaries, and most participate in the Fire Mitigation Fee program, which funds facilities and equipment, but the CSAs lack the authority to adopt a fire code or provide official response to planning and building projects. The following CSAs are located in the county.

- CSA 17: San Dieguito
- CSA 26: Rancho San Diego
- CSA 81: Fallbrook Local Parks
- CSA 83: San Dieguito Local Parks
- CSA 122: Otay Mesa East
- CSA 128: San Miguel Park
- CSA 135: Regional Communications
- CSA 136: Sundance Detention Basin
- CSA 137: Live Oak Springs
- CSA 138: Valley Center Parks and Rec

### **California Department of Forestry and Fire Protection**

CAL FIRE is an emergency response and resource protection department that responds to more than 5,600 wildland fires that burn over 172,000 acres in the state on average each year. In addition, department personnel respond on average to more than 300,000 other emergency calls that include structure fires, automobile accidents, medical aid, swift water rescues, civil

disturbance, search and rescue, floods, and earthquakes. CAL FIRE is the state's largest fire protection organization, whose fire protection team includes extensive ground forces, supported by a variety of firefighting equipment. CAL FIRE has joined with federal and local agencies to form a statewide mutual aid system. This system ensures a rapid response of emergency equipment by being able to draw on all available resources regardless of jurisdiction.

The principal contractor for the County is CAL FIRE. CAL FIRE is responsible for wildland fire protection on 1.2 million acres of State Responsibility Area (SRA) within the county. CAL FIRE is responsible for fire response services within over 50 percent of the total land area in the unincorporated area and provides watershed and fire protection for approximately 2,200 square miles of land. Within the county, CAL FIRE will respond to structural and vehicular fires and medical emergencies when requested by another fire agency or when these fires threaten to spread to wildlands. CAL FIRE protection areas include SRAs, where CAL FIRE has responsibility for emergency services, and Local Responsibility Areas (LRAs), where CAL FIRE provides emergency service support for CSAs and fire districts via contracts with the County. Within the county, CAL FIRE operates a total of 18 stations, including 1 air attack base in Ramona, with each station consisting of 3 career firefighters during fire season.

### **US Forest Service**

The US Forest Service (USFS) is responsible for fire protection and prevention on federal lands (Federal Responsibility Areas) and private lands within the boundaries of the Cleveland National Forest. USFS operates 12 fire stations in San Diego County and 1 station in Riverside County. USFS stations in Ramona and Descanso are open year-round, whereas the others are only open during the fire season (late summer/fall). Approximately 42 percent of the USFS emergency calls are related to fire suppression, and 50 percent are related to law enforcement. Fires on military installations are suppressed by the US Department of Defense (DOD) installation forces. In some instances, DOD installations request assistance from other federal, state, or local agencies. Tribal reservation fire departments also provide mutual fire service assistance to unincorporated areas that are near or bordering the reservation community area.

#### **2.15.1.2 Law Enforcement**

The San Diego County Sheriff's Office is the law enforcement agency for the unincorporated area of San Diego County. It is the fourth largest Sheriff's Department in the United States and serves a population of over 870,000 people (County of San Diego 2009). Approximately 448,700 of these residents are located in the unincorporated areas of San Diego County, and the remainder are located in the following 9 cities that contract with the Sheriff's Office: Vista, San Marcos, Santee, Lemon Grove, Imperial Beach, Poway, Encinitas, Del Mar, and Solana Beach. These 9 cities typically provide more comprehensive law enforcement services than the unincorporated area. For example, most contract cities have law enforcement personnel dedicated solely to traffic enforcement. The unincorporated area, on the other hand, relies on California Highway Patrol officers for traffic enforcement on highways and local roads. The Sheriff's Office has approximately 4,000 employees, 800 vehicles, and a fleet of helicopters (County of San Diego 2009).

## **Command Areas**

The Sheriff's Office service area covers approximately 4,200 square miles. Sheriff facilities located in unincorporated areas provide general law enforcement patrol, crime investigation, and crime prevention services. To effectively serve this extensive geographic area, the Sheriff's Office Law Enforcement Services Bureau operations are organized under a system of command stations, substations, offices, and storefronts. A separate rural enforcement area addresses the special needs of outlying areas patrolled by resident deputies. The operational structure is flexible, and areas may be realigned to provide better response to citizen calls for service, to ensure a balance of resources, and to be more responsive to community needs.

The Sheriff's Office Law Enforcement Operations Command Areas have further been divided into beat areas, which serve the unincorporated area. Beat areas that currently service the largest population and housing bases are El Cajon, Spring Valley, Lakeside, Fallbrook, Ramona, and Escondido.

### **2.15.1.3 Schools**

#### **Public Schools**

Public schools and educational facilities are mandated by the State Department of Education and administered by the San Diego County Board of Education and the San Diego County Office of Education. Thirty-seven unified, elementary, and high school districts provide service to the residents of the unincorporated area (County of San Diego 2009). Nine of these districts serve the unincorporated area only, and 28 serve both unincorporated and incorporated areas.

School districts that currently service the largest population and housing bases are Grossmont Union High, Cajon Valley Union Elementary, Fallbrook Union High, and Fallbrook Union Elementary (County of San Diego 2009).

#### **Community Colleges and Public Universities**

There are a number of private, public, and technical/professional schools that serve the county. In the San Diego region, more than 175,000 students attend institutions of higher education, with more than 12,000 of those students graduating each year (County of San Diego 2009).

### **2.15.1.4 Libraries**

#### **San Diego County Library**

The San Diego County Library system serves the County's unincorporated communities of 4S Ranch, Alpine, Bonita, Borrego Springs, Campo, Casa de Oro, Crest, Descanso, Fallbrook, Jacumba, Julian, Lakeside, Lincoln Acres, Pine Valley, Potrero, Rancho San Diego, Ranch Santa Fe, Spring Valley, and Valley Center. Incorporated cities served by the County Library system are Del Mar, El Cajon/Fletcher Hills, Encinitas/Cardiff, Imperial Beach, La Mesa, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, and Vista (County of San Diego 2009). In addition, 2 bookmobiles serve more remote and underserved areas.

Libraries that currently service the largest population and housing bases are Fallbrook, Rancho San Diego, Ramona, Spring Valley, and San Marcos (County of San Diego 2009).

### **San Diego County Public Law Library**

The San Diego County Public Law Library is a public institution that is open to the general public and provides county residents access to information concerning the laws that affect them. The County Public Law Library has 4 locations that serve San Diego residents: downtown San Diego, Chula Vista, El Cajon, and Vista.

#### **2.15.1.5 *Parks and Recreation***

### **County-Operated Recreational Facilities**

The following sections describe the types of recreational facilities within the unincorporated area of the county that are owned, operated, or maintained by the County Department of Parks and Recreation (DPR). These include local and regional parks, preserves, and county trails and pathways.

#### ***Local Parks***

Local parks in San Diego County contain recreational areas, such as a community center, athletic fields, or facilities of special interest to the community, and range in acreage depending on the uses and community or neighborhood they serve. They may be associated with joint facilities, such as schools, and smaller local parks may be located within or near town centers where they can be used as a common recreational and gathering space by the community (County of San Diego 2011).

#### ***Regional Parks***

Regional parks are usually larger than 200 acres, and often include educational components, such as an interpretive center or self-guided trails, as well as a variety of passive and active recreational uses. Most regional parks contain open space, natural resources, cultural resources, and multiuse trails. The County's acreage goal for regional park facilities identified in the General Plan Update is 15 acres per 1,000 residents (County of San Diego 2011).

#### ***Preserves***

Preserves include areas of environmental significance and beauty. The dual purpose of preserves is to protect sensitive environmental resources and to make these resources available for public recreation opportunities. However, typically only minimal improvements, such as trails, parking, and restroom facilities, are found in preserves (County of San Diego 2011).

The San Diego Multiple Species Conservation Program (MSCP) Plan for the southwestern portion of San Diego County was approved in 1998, covers 85 species, and is called the South County Subarea Plan. This plan was created as part of a larger plan known as the regional MSCP Plan (August 1998). The MSCP Plan covers 582,243 acres over 12 jurisdictions. Each jurisdiction has its own subarea plan with jurisdictionally specific requirements for implementing the MSCP. The subarea plan for the County's jurisdiction, adopted by the Board of Supervisors on October 22, 1997, covers 252,132 acres in the southwestern portion of the unincorporated county, as shown in Figure 2.5-7. The documents used to implement the MSCP include the South County Subarea Plan (adopted October 1997), the BMO, the final

MSCP Plan (dated August 1998), and the implementing agreement between the County and Wildlife Agencies (signed March 1998).

The County is currently developing additional MSCP Plans for the North County and East County unincorporated areas. The Public Draft North County Plan and Draft EIR/EIS are planned for public release in 2025. The draft North County Plan covers 40 plant and animal species (many of which overlap the species covered under the South County Subarea Plan) in a 679,259-acre area and around the unincorporated communities of Bonsall, De Luz, Fallbrook, Harmony Grove, Julian, Lilac, Pala, Palomar Mountain, Pauma Valley, Rainbow, Ramona, Rancho Santa Fe, Rincon Springs, Twin Oaks Valley, Valley Center, and Warner Springs within the County's jurisdiction (Figure 2.5-7). The East County Plan Study Area covers approximately 1.2 million acres and is bounded on the west generally by the western boundary of the Cleveland National Forest, on the north by the Riverside County, on the east predominantly by Imperial County, and the south by Mexico (Figure 2.5-7). The timing for a draft East County Plan is currently unknown.

### ***Trails/Pathways***

The primary purpose of trails is to provide recreation, transportation, health, and quality of life benefits associated with walking, hiking, mountain biking, and horseback riding throughout the county's varied environments. Trails also provide accessibility and connectivity to scenic and recreational areas. Trails are typically located away from vehicular roads and are primarily recreational in nature but can also serve as an alternative route for nonmotorized transportation. They are soft-surface facilities for single or multiple use by pedestrians, mountain bicyclists, and equestrians. Trail characteristics vary depending on location and user types. Pathways are nonmotorized transportation facilities located within a parkway or road right of way. Typical pathway width is 10 feet with decomposed granite or natural tread surface material. Pathways are intended to serve both circulation and recreation purposes. They provide a different experience from trails and are not an equivalent substitute; however, pathways help make critical connections and are an integral part of a functional trail system (County of San Diego 2011).

### **Recreational Facilities Managed by Other Entities (Non-County)**

The county includes substantial, unincorporated areas of open space lands that are owned and operated by federal, state, and other local government entities and nonprofit organizations. These open space areas are generally maintained as unimproved open space to protect important resources. The state-owned parklands are generally managed for both public recreation and resource conservation, while federal agencies may have a multitude of mandates.

### ***Federally Owned Lands***

The federal government owns 591,930 acres of predominantly open space land within the county (County of San Diego 2011). USFS manages 291,380 acres in the Cleveland National Forest (including the Corral Canyon Park, a park that allows off-highway vehicle activities); the US Bureau of Land Management manages 170,839 acres of land in the region; the Department of Defense manages 123,810 acres in Camp Pendleton; and the National Fish and Wildlife Service operates the San Diego National Wildlife Refuge, Tijuana Slough National Wildlife Reserve, and Sweetwater Marsh Wildlife Refuge, which collectively total 5,753 acres (County of San Diego 2011). The federal government provides for the management, conservation, and development of water, wildlife, forest, range, and recreational resources within these landholdings.

### **State-Owned Lands**

A total of 557,552 acres of public open space and parkland are provided by state-owned lands (County of San Diego 2011), including the following parks and recreation areas:

- Anza-Borrego Desert State Park is the state's largest and oldest desert state park and has badlands at near sea level to woodlands at 6,000 feet above sea level.
- Ocotillo Wells State Vehicular Recreation Area consists of a desert area that is available for off-highway exploration and recreation. Located adjacent to Anza-Borrego Desert State Park, this area has desert terrain, from below sea level to 400-foot elevations. It includes a motorcycle, four-wheel drive, all-terrain vehicle, and dune buggy use area.
- Cucamaya Rancho State Park consists of meadows, mountains, and oak woodlands. It provides popular facilities for equestrians, mountain bikers, and hikers and also offers accessible camping, parking, picnicking, and a campfire center.
- Palomar Mountain State Park has a beautiful view of the Pacific Ocean from its forested vantage point. Visitors can enjoy picnicking, hiking, and fishing here. It also offers accessible camping, restrooms, parking, and a campfire center.

### **Local Government and Public Utility–Owned Lands**

Water and irrigation districts provide major open areas, such as reservoirs and protected water bodies, and many districts provide multiuse trails and staging areas, such as Olivenhain Water District in the San Dieguito Community Plan Area (CPA) and the Otay Water District and Sweetwater Water District, both in the Sweetwater CPA (County of San Diego 2011).

Recreational uses, including fishing and limited boating, are generally permitted on reservoirs owned and managed by the City of San Diego (County of San Diego 2011).

### **Privately Owned Open Space Lands**

Privately owned open space lands include private parks, private nature preserves, private land banks, golf courses, club playing fields, landscaped outdoor areas, and facilities, such as animal or off-road vehicle parks and can also include floodplains, steep slope areas, seismic hazard zones, and sensitive habitats over which the County has land use authority (County of San Diego 2011). Many of these lands are owned and managed by nonprofit conservation groups.

## **2.15.2 Regulatory Framework**

### **2.15.2.1 Federal**

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

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

### **2.15.2.2 State**

#### **Mitigation Fee Act**

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

#### **California Health and Safety Code**

State fire regulations are set forth in Section 13000 et seq. of the Health and Safety Code. The Health and Safety Code includes requirements related to fire protection and notification systems; fire protection devices, such as extinguishers and smoke alarms; and fire suppression training.

#### **California Division of Occupational Safety and Health**

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

#### **California Building Code**

The California Building Code, Title 24 of the CCR, serves as the basis for the design and construction of buildings in California. The California Building Code (Title 24, Part 2) covers all aspects of building design and required safety features for all types of buildings, including fire protection systems, fire and smoke protection features, means of egress, and structural design and materials. Title 24, Part 3 is the Electrical Code, which contains standards for electrical systems, including safety features, such as overcurrent protection, surge arresters, and proper wiring methods. Title 24 applies to all new construction of both residential and nonresidential buildings and regulates energy consumed for heating, cooling, ventilation, water heating, and lighting.



## **California Fire Code**

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

CCR, Title 24, Section 701A.3 (New Buildings Located in Any Fire Hazard Severity Zone) requires that new buildings located in a Fire Hazard Severity Zone in the SRA, the LRA, any local agency Very High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted shall comply with all the requirements of Chapter 7A. These requirements include the following conditions:

- Roofing must be designed to be fire-resistant and constructed to prevent the intrusion of flames and embers (CCR, Title 24, Section 705A).
- Attic ventilation must be designed to be resistant to the intrusion of flames and embers into the attic area of the structure (CCR, Title 24, Section 706A).
- Exterior walls (including vents, windows, and doors) must be designed with noncombustible or ignition-resistant material and to resist the intrusion of flame and embers (CCR, Title 24, Sections 707A and 708A).
- Decking must be designed with ignition-resistant material (CCR, Title 24, Section 709A).
- Ancillary buildings and structures must comply with the above provisions (CCR, Title 24, Section 710A).

## **Board of Forestry and Fire Protection**

The Board of Forestry and Fire Protection is a governor-appointed body in CAL FIRE. It is responsible for developing the general forest policy of the state, determining the guidance policies of CAL FIRE, and representing the state's interest in federal forestland in California. Together, the Board of Forestry and Fire Protection and CAL FIRE work to carry out the California Legislature's mandate to protect and enhance the state's unique forest and wildland resources.

The Board of Forestry and Fire Protection is charged with developing policy to protect all wildland forest resources in California that are not under federal jurisdiction. These resources include major commercial and noncommercial stands of timber, areas reserved for parks and recreation, woodlands, brush-range watersheds, and all private and state lands that contribute to California's forest resource wealth. In addition, the Board of Forestry and Fire Protection is responsible for identifying fire hazard severity zones in the SRA and LRA, cities, urban regions, and agriculture lands where the local government is responsible for wildfire protection.

Local agencies are required to designate, by ordinance, very high fire hazard severity zones and to require landowners to reduce fire hazards adjacent to occupied buildings within these zones (Government Code Sections 51179 and 51182). The intent of identifying areas with very high fire hazards is to allow CAL FIRE and local agencies to develop and implement measures that would reduce the loss of life and property from uncontrolled wildfires (Government Code Section 51176).

Public Resources Code (PRC) Sections 4114 and 4130 authorize the Board of Forestry and Fire Protection to establish a fire plan, which, among other things, determines the levels of statewide fire protection services for SRA lands. CAL FIRE's most recently adopted fire plan is the 2024 Strategic Fire Plan, which builds on the goals and objectives of the 2019 plan. The primary goals of the 2024 Strategic Fire Plan for California include both suppression efforts and fire prevention efforts (CAL FIRE 2024). Government Code Section 65302.5 gives the Board of Forestry and Fire Protection the regulatory authority to evaluate General Plan safety elements for their land use policies in the SRA and Very High Fire Hazard Severity Zones, as well as methods and strategies for wildland fire risk reduction and prevention in those areas.

### **Public Resources Code Section 4291**

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors (PRC Sections 4201–4204 and Government Code Sections 51175–51189). Factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. CAL FIRE has identified 2 types of wildland fire risk areas: (1) wildland areas that may contain substantial forest fire risks and hazards, and (2) very high fire hazard risk zones.

PRC section 4291 gives CAL FIRE the authority to enforce 100 feet of defensible space around all buildings and structures on SRA lands. PRC sections 4790 through 4799.04 provide the regulatory authority for CAL FIRE to administer the California Forest Improvement Program. PRC Sections 4113 and 4125 give CAL FIRE the responsibility for preventing and extinguishing wildland fires in the SRAs. The PRC also includes fire safety statutes that restrict the use of equipment that may produce a spark, flame, or fire; requires the use of spark arrestors on construction equipment with internal combustion engines; specifies requirements for the safe use of gasoline-powered tools in fire hazard areas; and specifies fire suppression equipment that must be provided for various types of work in fire-prone areas.

New development located in SRAs is subject to the following requirements:

- determination that new subdivisions are consistent with regulations adopted by the State Board of Forestry and Fire Protection pursuant to PRC sections 4290 and 4291 or are consistent with local ordinances certified by the State Board of Forestry and Fire Protection as meeting or exceeding the state regulations (CCR, Title 14, Section 1266.01),
- defensible space of 100 feet around all buildings and structures (PRC Section 4291; CCR, Title 14, Section 1299.03),
- provision of adequate emergency access and egress (PRC Sections 4290, 4291; CCR, Title 14, Sections 1273.01–1273.09),
- emergency water requirements (CCR, Title 14, Sections 1275.01–1275.04), and

- building signage and number requirements (PRC Sections 4290 4291; CCR, Title 14, Sections 1274.01–1274.04).

### **Public School Development Impact Fees**

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

Government Code Sections 65995(h) and 65996(b) require full and complete school facilities mitigation. Section 65995(h) of the Government Code 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 provision of adequate school facilities. Section 65996(b) of the Government Code states that the provisions of the Government Code provide full and complete school facilities mitigation.

### **California Emergency Medical Services Authority**

The Emergency Medical Services Authority provides statewide coordination and leadership for the planning, development, and implementation of local EMS systems. California has 34 local EMS systems, which provide EMS for California's 58 counties. Seven regional EMS systems and 26 single-county agencies provide the services. Regional systems are usually composed of small, more rural, less-populated counties, and single-county systems generally exist in the larger and more urban counties (EMSA 2024).

### **Emergency Response/Evacuation Plans**

The State of California passed legislation authorizing the Office of Emergency Services to prepare a Standard Emergency Management System (SEMS) program, which sets forth measures by which a jurisdiction should handle emergency disasters (Government Code Section 8607 et seq.). Noncompliance with SEMS could result in the state withholding disaster relief from the noncomplying jurisdiction in the event of an emergency disaster. The preservation of life, property, and the environment is an inherent responsibility of local, state, and federal government.

### **Cannabis State Regulations**

Permitting of commercial cannabis operations (medical and adult use) is regulated by the California Department of Cannabis Control under CCR Title 4, Division 19.

CCR, Title 4, Division 19 includes the following requirements regarding public services for commercial cannabis uses.

- CCR, Title 4, Section 15011: Additional Information
  - (a) A commercial cannabis business applying for a license to cultivate cannabis shall provide the following information:
    - (10) An attestation that the local fire department has been notified of the cultivation site if the application is for an indoor license type.
- CCR, Title 4, Section 15036: Notification of Theft, Loss, and Criminal Activity
  - (a) A licensee shall notify the Department and local law enforcement within 24 hours of discovery of any of the following situations:
    - (1) The licensee discovers a significant discrepancy, as defined in section 15034, in its inventory.
    - (2) The licensee discovers diversion, theft, loss, or any other criminal activity pertaining to the operations of the licensee.
    - (3) The licensee discovers diversion, theft, loss, or any other criminal activity by an agent or employee of the licensee pertaining to the operations of the licensee.
    - (4) The licensee discovers loss or unauthorized alteration of records related to cannabis or cannabis products, customers, or the licensee's employees or agents.
    - (5) The licensee discovers any other breach of security.
  - (b) The notification to the Department pursuant to subsection (a) shall be submitted on the Licensee Notification and Request Form, Notifications and Requests Regarding Regulatory Compliance, DCC-LIC-028 (New 2/22), which is incorporated herein by reference, and shall include the date and time of occurrence of the theft, loss, or criminal activity, the name of the local law enforcement agency that was notified, and a description of the incident including, where applicable, the item(s) that were taken or lost.
- CCR, Title 4, Section 15042: Premise Access Requirements
  - (a) For a premises that is not open to the public, the licensee shall establish and implement an identification and sign-in/sign-out procedure for all persons accessing the premises, including authorized individuals, suppliers, and visitors.
  - (b) Licensees shall ensure that only employees of the licensee and other authorized individuals access the licensed premises.
  - (c) For the purpose of this section, "authorized individuals" include outside vendors, contractors, or other individuals conducting business that requires access to the licensed premises.
  - (d) An individual who enters the licensed premises and is not employed by the licensee shall be escorted by an employee of the licensee at all times while within the licensed premises.
  - (e) A licensee shall maintain a record of all authorized individuals who are not employees of the licensee who enter the licensed premises. The record shall include the name of the individual, the company the individual works for, the reason the individual entered the licensed premises, the date, and the times the individual

entered and exited the licensed premises. These records shall be made available to the Department immediately upon request.

- (f) A licensee shall not receive consideration or compensation for permitting an individual to enter the licensed premises.
- CCR, Title 4, Section 15601: Temporary Cannabis Event Requirements
  - (h) The licensed cannabis event organizer shall hire or contract for security personnel to provide security services at the licensed temporary cannabis event. All security personnel hired or contracted for by the licensee shall be at least 21 years of age, licensed by the Bureau of Security and Investigative Services, and comply with chapters 11.4 and 11.5 of division 3 of the Business and Professions Code. Security personnel shall be present on the licensed premises at all times cannabis goods are available for sale and/or cannabis goods consumption is allowed on the licensed premises.
  - (i) The Department may require the event organizer and all participants to cease operations without delay if, in the opinion of the Department or local law enforcement, it is necessary to protect the immediate public health and safety of the people of the state. Upon notification from the Department that the event is to cease operations, the event organizer shall immediately stop the event and all participants shall be removed from the premises within the time frame provided by the Department.
  - (m) Upon notification from the Department, the event organizer shall immediately expel from the event any person selling cannabis goods without a license from the Department that authorizes the participant to sell cannabis goods. The event organizer or their representative shall remain with the person being expelled from the premises at all times until he or she vacates the premises. If the person does not vacate the premises, the Department may inform the event organizer that the event must cease operations. Upon notification from the Department that the event is to cease operations, the event organizer shall immediately stop the event and all participants shall be removed from the premises within the time frame provided by the Department.
- CCR, Title 4, Section 17202.1: General Requirements for Extraction and Post-Extraction Processing
  - (a) A licensed manufacturer that uses a volatile solvent, a flammable liquid, or a solvent that creates an asphyxiant gas shall ensure that the solvent is used in accordance with the requirements of:
    - (1) Chapter 39 of the California Fire Code;
    - (2) Title 8, California Code of Regulations, sections 5416-5420, which includes ensuring adequate ventilation and controlling sources of ignition;
    - (3) All Division of Occupational Safety and Health (Cal/OSHA) regulations related to the processing, handling, and storage of the applicable solvent; and
    - (4) All fire, safety, and building code requirements related to the processing, handling, and storage of the applicable solvent or gas.
  - (b) No volatile solvent extraction or post-extraction processing operations or other closed-loop system operations shall occur in an area zoned as residential.

- CCR, Title 4, Section 17205: Additional Requirements for Ethanol Operations - A licensed manufacturer that uses ethanol in manufacturing operations for extractions or post-extraction processing shall receive approval for the facility and equipment from the local fire code official prior to commencing operations, if required by local ordinance.

### **2.15.2.3 Local**

#### **San Diego County General Plan**

The San Diego County General Plan contains policies associated with fire protection and law enforcement in the Safety Element, policies associated with schools and libraries in the Land Use Element and policies associated with recreation in the Open Space and Conservation Element. The following policies are relevant to the Cannabis Program (County of San Diego 2011, 2021):

#### ***Fire Protection and Emergency Response***

- **Policy S-7.1: Water Supply.** Ensure that water supply infrastructure adequately supports existing and future development and provides adequate water flow to combat structural and wildland fires. Water systems shall equal or exceed the California Fire Code, California Code of Regulations, or, where a municipal-type water supply is unavailable, the latest edition of National Fire Protection Association (NFPA) 1142, “Standard on Water Supplies for Suburban and Rural Fire Fighting.”
- **Policy S-7.2: Funding Fire Protection Services.** Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.
- **Policy S-7.3: Fire Protection Services for Development.** Require that new development demonstrate that adequate fire services can be provided that meet the minimum staffing of personnel and that meet the minimum travel times identified in Table S-3 (Travel Time Standards from Closest Fire Station).

#### ***Parks and Recreation***

- **Policy COS-24.1: Park and Recreation Contributions.** Require development to provide fair-share contributions toward parks and recreation facilities and trails consistent with local, state, and federal law.

#### **County of San Diego, Consolidated Fire Code**

The fire protection districts within the boundaries of San Diego County have collaborated to adopt by an ordinance for each district, the 2022 California Fire Code. The 2023 Consolidated Fire Code is based upon the County’s 2023 Fire Code as currently referenced and adopted in Title 9, Division 6, Chapter 1 of the County Code, subject to the modifications of each fire protection district to the Building Standards Code based upon their respective determinations as to what modifications are reasonably necessary because of local climatic, geological, and topographical conditions within the district.

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## **San Diego County Board of Supervisors Policy I-84, Project Facility Availability and Commitment for Public Sewer, Water, School, and Fire Services**

The Board of Supervisors Policy I-84 establishes procedures for using Project Facility Availability forms and in certain cases, Project Facility Commitment forms, for the processing of major and minor subdivisions and certain other discretionary land use permits. These standardized procedural forms have been used to (1) obtain information from special districts and other facility providers regarding facility availability, (2) ensure that this information is reviewed by the appropriate decision-making body, and (3) provide data to the facility provider in order to determine what capital improvements are required to serve the proposed project.

## **County of San Diego Department of Parks and Recreation, Strategic Plan**

The mission of the County of San Diego DPR is to provide opportunities for high quality parks and recreation experiences and to preserve regionally significant natural and cultural resources. The DPR Strategic Plan discusses what DPR does, including how it implements programs and achieves objectives to provide and maintain the County's parks and recreational areas.

## **County of San Diego Trails Program**

In January 2005, the County Board of Supervisors adopted the County of San Diego Trails Program (CTP). The components of the CTP include a community trails master plan (CTMP) and Regional Trails Plan, which are described below. The CTP also includes a General Plan Amendment, a Mitigated Negative Declaration, and a Trails Ordinance regulating the use of trails and amendments to the County Subdivision Ordinances regarding dedication and improvement of trails.

The CTP allows the County to develop a system of interconnected regional and community trails and pathways. These trails and pathways are intended to address an established public need for recreation and transportation and also provide health and quality of life benefits associated with hiking, mountain biking, and horseback riding throughout the biologically diverse environments in the county.

## **Community Trails Master Plan**

The CTMP is the implementing document for the CTP and contains adopted individual community trails and pathways plans. The CTMP involves trail development, maintenance, and management on public, semipublic and private lands. The main focus of the CTMP is to implement and maintain a realistic system of interconnected and continuous regional and community trails. The CTMP also includes development and management guidelines that can be applied to community level trail systems. Community trails will be implemented only in CPAs and Subregions wishing to participate in the program. The community trails maps contained in the CTMP depict corridors of general alignments. The term "general alignment" is used to describe the general location of a future trail generally within a quarter-mile wide corridor.

When an application for a specified discretionary development permit is submitted for land that includes a trail corridor, the specific location of a proposed trail within the trail corridor would be determined based on a trail route study. The route study would determine the appropriate location of the new trail in the corridor based on the trail design criteria included in the CTMP.

The purpose of these criteria is to locate trails where they avoid causing impacts to sensitive habitat and other significant environmental resources.

The environmental review for a proposed discretionary project would include a site-specific analysis of the trail proposed in the route study. The County may require the dedication of a trail easement and improvement of a trail on a case-by-case basis. Authority to require trail dedications is based on the established need for trails and findings relative to their public benefit and legitimate public function as described in the CTMP. Dedication is required when there is a necessary rough proportionality between the required dedication and the impacts of and benefits to the proposed development. Trail dedication is not required for ministerial (nondiscretionary) permits, such as building permits.

### **Regional Trails Plan**

The Regional Trails Plan identifies County-approved general alignment corridors of regional trails in the county. Regional trails have characteristics and conditions that serve a regional function by covering long linear distances, transcending community or municipal borders, having state or national significance, or providing important connections to existing parks and preserves. The Regional Trails Map includes 9 trails that provide significant north-south and east-west trail corridors that traverse the county.

### **County of San Diego Active Transportation Plan**

The County completed an update to the Bicycle Transportation Plan (ATP) through the creation of the Active Transportation plan, approved by the Board of Supervisors in October 2018. The ATP supports efforts to promote active transportation options through pedestrian and bicycle improvements in the unincorporated county. Development of the ATP included an analysis of existing pedestrian and bicycle conditions.

## **2.15.3 Analysis of Project Impacts and Determination of Significance**

### **2.15.3.1 *Thresholds of Significance***

According to Appendix G of the State CEQA Guidelines, a public services and recreation impact is considered significant if implementation of the Cannabis Program would do any of the following:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
  - fire,
  - police protection,
  - schools,
  - parks, and
  - other public facilities.



- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial deterioration of the facility would occur or be accelerated; or
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

### **2.15.3.2 *Issues Not Discussed Further***

#### **Schools, Libraries, and Other Public Facilities**

New cannabis facilities permitted and licensed under the Cannabis Program could result in increased job opportunities, thus resulting in increased population in the county. As discussed in Section 2.14, “Population and Housing,” implementation of the Cannabis Program would not substantially induce population growth in the unincorporated area of the county, such that additional or increased housing beyond existing housing/growth projections would be required. Furthermore, it is anticipated that newly created jobs could be filled by existing county residents, including the unemployed labor force, as well as those commuting from neighboring counties. For these reasons, implementing the Cannabis Program is not anticipated to result in a substantial increase in population levels in the county.

Because anticipated growth would not exceed existing housing/growth projections identified for the county (see Section 2.14, “Population and Housing”), implementation of the Cannabis Program is not expected to result in an increased demand for schools, libraries, or other public facilities (e.g., general governmental services, such as administration and public health) that would necessitate new or expanded facilities that could create physical environmental impacts. Therefore, no impacts related to schools, libraries, or other public facilities would occur, and this issue is not discussed further.

#### **Parks and Recreation**

The Cannabis Program does not propose the development of new or expanded parks or recreational facilities, nor would it result in the loss or deterioration of existing parks or recreational facilities. As described above for schools, libraries, and other public facilities, anticipated growth resulting from implementation of the Cannabis Program would not exceed existing housing/growth projections identified for the county (see Section 2.14, “Population and Housing”). Therefore, implementation of the Cannabis Program is not expected to result in an increased demand for parks or recreational facilities. For these reasons, no impacts related to parks or recreational facilities would occur, and this issue is not discussed further.

### **2.15.3.3 *Approach to Analysis***

The following analysis assesses the environmental effects of the Cannabis Program and each alternative with respect to the existing public service providers in the program area and possible effects to public services as a result of implementation of the Cannabis Program based on a review of existing documents, policies, ordinances, and other regulations pertinent to public services.

### **2.15.3.4 Issue 1: Fire Protection Services**

#### **Guidelines for Determination of Significance**

According to Appendix G of the State CEQA Guidelines, the proposed Cannabis Program would have a significant impact if it would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, and other performance objectives for fire protection.

#### **Impact Analysis**

As discussed in Section 2.15.1, “Existing Conditions,” a substantial portion of the unincorporated area of San Diego County is predominantly located in Very High, High, and Moderate Fire Hazard Severity Zones.

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

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

New commercial cannabis facilities located within SRAs would be subject to compliance with PRC Sections 4290 and 4291, which require defensible space of 100 feet around all buildings and structures, adequate emergency access and egress, availability of emergency water, and building signage and number requirements, as well as CCR, Title 24, Section 701A.3, which contains additional building standards for new building construction located in any fire hazard severity zone within SRAs, any local agency Very-High Fire Hazard Severity Zone, or any wildland-urban interface fire area.

In addition, new licensed cultivation sites would be required to comply with CCR Title 4, Division 19, Section 15011 regarding the notification of the cannabis use to the local fire department. CCR Title 4, Division 19, Sections 17202.1 and 17205 include requirements for cannabis manufacturing facilities that use a volatile solvent, flammable liquid, solvents that create an asphyxiant gas, or ethanol to ensure compliance with Chapter 35 of the California Fire Code; CCR Title 8, Sections 5416 through 5420, which address ventilation and control of ignition sources; Division of Occupational Safety and Health regulations; and all applicable fire, safety, and building codes related to the processing, handling, and storage of solvents and gas.

The proposed Cannabis Program would include Section 21.2508(a) of the amendments to the County Regulatory Code, and commercial cannabis facilities would be required to obtain all applicable zoning and land use entitlements, including approval from the local fire authority. As required by the San Diego County Fire Protection District, building and grading plan forms, including fire code plan check requirements, would be necessary for all new buildings, as well as compliance with the 2023 Consolidated Fire Code for the fire protection districts in San Diego County. Compliance with existing regulations and the proposed Cannabis Program would ensure water supply, fire protection funding, and fire protection service standards identified in General Plan Policies S-7.1, S-7.2, and S-7.3 are satisfied.

***Alternative 1: No Project—Retention of Current Cannabis Regulations***

Under Alternative 1, the Cannabis Program would not be adopted. The existing 5 commercial cannabis facilities in the unincorporated areas of El Cajon, Escondido, and Ramona would be allowed to continue to operate under the existing ordinances as well as potentially expand their existing facilities and operations to a total of up to 10,000 square feet of building area for each site. The potential expansion of existing sites under this alternative would not result in adverse physical impacts associated with the provision of new or physically altered fire protection and emergency services or result in the need for new or physically altered fire protection and emergency services.

This impact would be less than significant under Alternative 1.

***Alternative 2: Proposed Project—Cannabis Program Consistent with State Requirements***

The Cannabis Program under Alternative 2 is anticipated to accommodate up to 372 cultivation and 170 noncultivation sites/licenses within the county in 2044 (refer to Table 1.4 in Chapter 1, “Project Description, Location, and Environmental Setting,” for a full list of development assumptions). Alternative 2 would include 600-foot buffers from cannabis uses from certain state-defined sensitive uses, including schools, daycares, and youth centers.

Under Alternative 2, new commercial cannabis facilities would be subject to compliance with the fire regulations identified above that would include the following:

- PRC Sections 4290 and 4291, which require defensible space of 100 feet around all buildings and structures, adequate emergency access and egress, availability of emergency water, and building signage and number requirements.
- CCR, Title 24, Section 701A.3, which contains additional building standards for new building construction located in any Fire Hazard Severity Zone within SRAs, any local agency Very-High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area.
- CCR Title 4, Division 19, Section 15011, regarding the notification of the cannabis use to the local fire department.
- CCR Title 4, Division 19, Section 17202.1 and 17205, which include requirements for cannabis manufacturing facilities that use a volatile solvent, flammable liquid, solvents that creates an asphyxiant gas, or ethanol.

- Section 21.2508(a) of the amendments to the County Regulatory Code proposed in the Cannabis program that commercial cannabis facilities would be required to obtain all applicable zoning and land use entitlements, including approval from the local fire authority. As required by the San Diego County Fire Protection District, building and grading plan forms including fire code plan check requirements would be necessary for all new buildings, as well as compliance with the 2023 Consolidated Fire Code for the fire protection districts in San Diego County.

There is no information or evidence to suggest that the Cannabis Program would increase fire protection needs as compared to baseline conditions or increase demand such that new or additional facilities would be required. Overall, compliance with existing regulations and the proposed Cannabis Program would ensure water supply, fire protection funding, and fire protection service standards identified in General Plan Policies S-7.1, S-7.2, and S-7.3 are satisfied and that there is no increased need for fire protection services in the county. Compliance with existing regulations and General Plan Policies would ensure that the Cannabis Program would not result in adverse physical impacts associated with the provision of new or physically altered fire protection and emergency services or result in the need for new or physically altered fire protection and emergency services.

This impact would be less than significant under Alternative 2.

### ***Alternative 3: Cannabis Program with Expanded County Regulations***

The Cannabis Program under Alternative 3 is anticipated to accommodate up to 372 cultivation and 170 noncultivation sites/licenses within the county in 2044 (refer to Table 1.4 in Chapter 1, "Project Description, Location, and Environmental Setting," for a full list of development assumptions). Alternative 3 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of sensitive uses.

As discussed above under Alternative 2, new commercial cannabis facilities would be required to comply with state regulations and proposed amendments to the County Regulatory Code that would address fire protection needs and would avoid expanded need for fire protection services.

This impact would be less than significant under Alternative 3.

### ***Alternative 4: Cannabis Program with Outdoor Cannabis Cultivation Prohibition***

The Cannabis Program under Alternative 4 is anticipated to accommodate up to 212 cultivation and 170 noncultivation sites/licenses within the county in 2044 (refer to Table 1.4 in Chapter 1, "Project Description, Location, and Environmental Setting," for a full list of development assumptions). Alternative 4 would allow mixed-light and indoor cannabis cultivation only when contained within a building. Alternative 4 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities.

As discussed above under Alternative 2, new commercial cannabis facilities would be required to comply with state regulations and proposed amendments to the County Regulatory Code that would address fire protection needs and would avoid expanded need for fire protection services.

This impact would be less than significant under Alternative 4.

### ***Alternative 5: Cannabis Program with Maximum 1 Acre of Outdoor Cannabis Cultivation Canopy***

The Cannabis Program under Alternative 5 is anticipated to accommodate up to 372 cultivation and 170 noncultivation sites/licenses within the county in 2044 (refer to Table 1.4 in Chapter 1, “Project Description, Location, and Environmental Setting,” for a full list of development assumptions). Alternative 5 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities. Alternative 5 also limits the size of outdoor cannabis cultivation canopy to 1 acre.

As discussed above under Alternative 2, new commercial cannabis facilities would be required to comply with state regulations and proposed amendments to the County Regulatory Code that would address fire protection needs and would avoid expanded need for fire protection services.

This impact would be less than significant under Alternative 5.

#### ***2.15.3.5 Issue 2: Police Protection Services***

##### **Guidelines for Determination of Significance**

According to Appendix G of the State CEQA Guidelines, the proposed Cannabis Program would have a significant impact if it would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, and other performance objectives for police protection services.

##### **Impact Analysis**

As described in Section 3.15.2, “Regulatory Framework,” state regulations outline specific security requirements for commercial cannabis licensees. These regulations include CCR, Title 4, Sections 15036, 15042, and 15601, which impose access limitations for commercial cannabis cultivation sites.

Commercial cannabis facilities permitted and licensed through the Cannabis Program would be required to comply with CCR, Title 4, Section 15036, regarding notification of theft, loss, and criminal activity; Section 15042, regarding security measures for the facility sufficient to ensure the safety of employees and protection of the premises; and Section 15601 regarding security measures for temporary cannabis events.

In addition, the proposed Cannabis Program would include Section 21.2510(a)(3) of the County Regulatory Code amendments, which requires preparation of detailed security plan, prepared by a qualified professional, which outlines the measures that would be taken to ensure the safety of persons and property on the business site. In addition, Section 21.2510(a)(5) of the amendments to the County Regulatory Code requires preparation of a Neighborhood Compatibility Plan that describes how the business would take proactive steps to avoid becoming a nuisance or having negative effects on the surrounding neighbors and community.

***Alternative 1: No Project—Retention of Current Cannabis Regulations***

Under Alternative 1, the Cannabis Program would not be adopted. The existing 5 commercial cannabis facilities in the unincorporated areas of El Cajon, Escondido, and Ramona would be allowed to continue to operate under the existing ordinances as well as potentially expand their existing facilities and operations to a total of up to 10,000 square feet of building area for each site. The potential expansion of existing sites under this alternative would not result in adverse physical impacts associated with the provision of new or physically altered law enforcement services or result in the need for new or physically altered law enforcement services.

This impact would be less than significant under Alternative 1.

***Alternative 2: Proposed Project—Cannabis Program Consistent with State Requirements***

The Cannabis Program under Alternative 2 is anticipated to accommodate up to 372 cultivation and 170 noncultivation sites/licenses within the county in 2044 (refer to Table 1.4 in Chapter 1, “Project Description, Location, and Environmental Setting,” for a full list of development assumptions). Alternative 2 would include 600-foot buffers from cannabis uses from certain state-defined sensitive uses, including schools, daycares, and youth centers.

As discussed above, CCR, Title 4, Section 15036, 15042, and 15601 require security measures of the facility and reporting procedures in the case of theft, loss, or criminal activities. In addition, the proposed amendments to the County Regulatory Code contain requirements for a detailed security plan (Section 21.2510(a)(3)) and preparation of a Neighborhood Compatibility Plan (Section 21.210(a)(5)). Compliance with these requirements would ensure that on-site security measures are provided and site access is sufficient. Given these provisions, no substantial demands on local law enforcement would be expected such that construction of new facilities (e.g., sheriff stations) would be necessary from implementation of the Cannabis Program. Compliance with existing regulations and General Plan Policies would ensure that the Cannabis Program would not result in adverse physical impacts associated with the provision of new or physically altered fire protection and emergency services or result in the need for new or physically altered police protection services.

This impact would be less than significant under Alternative 2.

***Alternative 3: Cannabis Program with Expanded County Regulations***

The Cannabis Program under Alternative 3 is anticipated to accommodate up to 372 cultivation and 170 noncultivation sites/licenses within the county in 2044 (refer to Table 1.4 in Chapter 1, “Project Description, Location, and Environmental Setting,” for a full list of development assumptions). Alternative 3 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities. Advertising of cannabis on billboards would also be prohibited within 1,000 feet of sensitive uses.

As discussed above under Alternative 2, new commercial cannabis facilities would be required to comply with state regulations and proposed amendments to the County Regulatory Code that would address security needs and would avoid the need for construction of new facilities (e.g., sheriff stations) in order to maintain acceptable service ratios, response times, and other performance objectives for police protection services.

This impact would be less than significant under Alternative 3.

#### ***Alternative 4: Cannabis Program with Outdoor Cannabis Cultivation Prohibition***

The Cannabis Program under Alternative 4 is anticipated to accommodate up to 212 cultivation and 170 noncultivation sites/licenses within the county in 2044 (refer to Table 1.4 in Chapter 1, “Project Description, Location, and Environmental Setting,” for a full list of development assumptions). Alternative 4 would allow mixed-light and indoor cannabis cultivation only when contained within a building. Alternative 4 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities.

As discussed above under Alternative 2, new commercial cannabis facilities would be required to comply with state regulations and proposed amendments to the County Regulatory Code that would address security needs and would avoid the need for construction of new facilities (e.g., sheriff stations).

This impact would be less than significant under Alternative 4.

#### ***Alternative 5: Cannabis Program with Maximum 1 Acre of Outdoor Cannabis Cultivation Canopy***

The Cannabis Program under Alternative 5 is anticipated to accommodate up to 372 cultivation and 170 noncultivation sites/licenses within the county in 2044 (refer to Table 1.4 in Chapter 1, “Project Description, Location, and Environmental Setting,” for a full list of development assumptions). Alternative 5 additionally prohibits the development of cannabis facilities within 1,000 feet of sensitive uses, including other cannabis facilities. Alternative 5 also limits the size of outdoor cannabis cultivation canopy to 1 acre.

As discussed above under Alternative 2, new commercial cannabis facilities would be required to comply with state regulations and proposed amendments to the County Regulatory Code that would address security needs and would avoid the need for construction of new facilities (e.g., sheriff stations).

This impact would be less than significant under Alternative 5.

### **2.15.4 Cumulative Impacts**

The cumulative context for public services is San Diego County and the individual service areas of the fire and police protection service providers.

#### ***2.15.4.1 Issue 1: Fire Protection Services***

The San Diego County General Plan Update Draft EIR identified no cumulatively considerable impacts on fire protection services from implementation of the General Plan (County of San Diego 2009).

As discussed under Section 2.15.3.4, “Issue 1: Fire Protection Services,” commercial cannabis facilities permitted and licensed through the Cannabis Program under Alternatives 1, 2, 3, 4, and 5 would not result in the need for expanded fire protection services that would necessitate the construction of new facilities (e.g., fire stations). This is because commercial cannabis facilities would be required to comply with established fire protection and emergency service regulations in PRC Sections 4290 and 4291; CCR Title 24, Section 701A.3, Title 4, Division 19, Section 15011, Section 17202.1, and Section 17205; as well as provisions in the proposed

amendments in the Regulatory Code to obtain approval from the local fire authority and compliance with fire code plan check requirements. Because compliance with existing regulation and the proposed Cannabis Program would ensure water supply, fire protection funding, and fire protection service standards provided in General Plan policies S-7.1, S-7.2, and S-7.3 are satisfied, there would be no increased need for fire protection services in the unincorporated area. The incremental effects of the Cannabis Program related to fire protection and emergency services would not combine with the effects of cumulative projects to create significant cumulative impacts because the state and local requirements would minimize the need for expanded fire protection services in the unincorporated area such that no new facilities would be required. Therefore, the Cannabis Program's incremental effects would not be cumulatively considerable under Alternative 1, 2, 3, 4, or 5.

#### **2.15.4.2 Issue 2: Police Protection Services**

As discussed in Section 2.15.3.5, "Issue 2: Police Protection Services," commercial cannabis facilities permitted and licensed through the Cannabis Program would not result in the need for expanded police protection services that would necessitate the construction of new facilities (e.g., sheriff stations). This is because cannabis facilities would be required to comply with in CCR Title 4, Sections 15036 and 15043, as well proposed amendments to the Regulatory Code to prepare and implement a detailed security plan (Section 21.2510(a)(3)) and preparation of a Neighborhood Compatibility Plan (Section 21.210(a)(5)). Compliance with these regulatory requirements would ensure that on-site security measures are provided such that there would not be substantially greater strain on local law enforcement; therefore, construction of new facilities would not be necessary. The incremental effects of the Cannabis Program related to law enforcement services would not combine with the effects of cumulative projects to create significant cumulative impacts because the state and local requirements would minimize the need for expanded law enforcement services in the unincorporated area such that no new facilities would be required. Therefore, the Cannabis Program's incremental effects would not be cumulatively considerable under Alternative 1, 2, 3, 4, or 5. Compliance with existing regulations and General Plan Policies would ensure that the Cannabis Program would not result in a cumulative adverse physical impact associated with the provision of new or physically altered fire protection and emergency services or result in the need for new or physically altered police protection services.

### **2.15.5 Significance of Impacts Prior to Mitigation**

#### **2.15.5.1 Issue 1: Fire Protection Services**

The proposed Cannabis Program would result in less-than-significant direct impacts to public services under Alternatives 1 through 5. It would not contribute to significant cumulative impacts associated with public services.

#### **2.15.5.2 Issue 2: Police Protection Services**

The proposed Cannabis Program would result in less-than-significant direct impacts to public services under Alternatives 1 through 5. It would not contribute to significant cumulative impacts associated with public services.



## **2.15.6 Mitigation**

### **2.15.6.1 *Issue 1: Fire Protection Services***

No mitigation is required.

### **2.15.6.2 *Issue 2: Police Protection Services***

No mitigation is required.

## **2.15.7 Conclusion**

The discussion below provides a synopsis of the conclusion reached in each of the above impact analyses.

### **2.15.7.1 *Issue 1: Fire Protection Services***

Expanded (Alternative 1) or new cannabis facilities would be required to comply with state and local regulations and standards related to public services, which would minimize impacts related to fire protection services. For these reasons, no mitigation is required, and this impact is less than significant for Alternatives 1 through 5. In addition, the proposed Cannabis Program would not contribute to a significant cumulative impact.

### **2.15.7.2 *Issue 2: Police Protection Services***

Expanded (Alternative 1) or new cannabis facilities would be required to comply with state and local regulations and standards related to security and site access, which would minimize impacts related to police protection services. For these reasons, this impact is less than significant for Alternatives 1 through 5. In addition, the proposed Cannabis Program would not contribute to a significant cumulative impact.

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